

# DRAFT ENVIRONMENTAL IMPACT REPORT

FOR THE

## HOLLYWOOD PARK REDEVELOPMENT PROJECT

SUBMITTED TO:

CITY OF INGLEWOOD  
PLANNING AND BUILDING DEPARTMENT  
1 MANCHESTER AVENUE  
INGLEWOOD, CALIFORNIA 90301

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SUBMITTED BY:



CHRISTOPHER A. JOSEPH & ASSOCIATES  
Environmental Planning and Research



### West Los Angeles

11849 W. Olympic Boulevard  
Suite 101  
Los Angeles, California 90064  
Phone 310.473.1600  
Fax 310.473.3336

### Downtown Los Angeles

623 W. 6th Street  
Suite 1134  
Los Angeles, California 90014  
Phone 213.417.4400  
Fax 213.488.1012

### Santa Clarita

27413 Tourney Road  
Suite 120  
Santa Clarita, California 91355  
Phone 661.260.1411  
Fax 661.260.1414

### Agoura Hills

30851 Agoura Road  
Suite 210  
Agoura Hills, California 91301  
Phone 818.735.8838  
Fax 818.735.8858

### Petaluma

179 H Street  
Petaluma, California 94952  
Phone 707.283.4040  
Fax 707.283.4041

### Oakland

610 18th Street  
Suite 514  
Oakland, California 94612  
Phone 510.452.5200  
Fax 510.452.5202

### Mammoth Lakes

P.O. Box 100-PMB #581  
Mammoth Lakes, California 93546  
Phone 760.924.0337

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## ***Hollywood Park Redevelopment Project***

***SCH No. 2007111018  
1050 S. Prairie Avenue  
Inglewood, California 90305***

***Prepared for:***

***City of Inglewood  
Planning and Building Department  
One Manchester Boulevard  
City Hall, Fourth Floor  
Inglewood, California 90305***

***Prepared By:***



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

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## TABLE OF CONTENTS

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<u>Section</u>	<u>Page</u>
I. INTRODUCTION/EXECUTIVE SUMMARY .....	I-1
II. PROJECT DESCRIPTION	
A. LOCATION AND BOUNDARIES .....	II-1
B. STATEMENT OF PROJECT OBJECTIVES .....	II-4
C. PROJECT CHARACTERISTICS .....	II-6
D. DISCRETIONARY ACTIONS .....	II-36
III. RELATED PROJECTS .....	III-1
IV. ENVIRONMENTAL IMPACT ANALYSIS	
A. AESTHETICS .....	IV.A-1
B. AIR QUALITY .....	IV.B-1
C. GEOLOGY/SOILS .....	IV.C-1
D. HAZARDOUS MATERIALS/RISK OF UPSET.....	IV.D-1
E. CULTURAL RESOURCES .....	IV.E-1
F. HYDROLOGY/WATER QUALITY .....	IV.F-1
G. NOISE.....	IV.G-1
H. POPULATION, HOUSING & EMPLOYMENT.....	IV.H-1
I. LAND USE PLANNING .....	IV.I-1
J. PUBLIC UTILITIES	
1. WATER .....	IV.J-1
2. WASTEWATER.....	IV.J-32
3. ENERGY CONSERVATION .....	IV.J-40
4. SOLID WASTE.....	IV.J-52

---

5.	STORM DRAINS (See Section IV.F)	IV.J-59
K.	PUBLIC SERVICES	
1.	POLICE SERVICES	IV.K-1
2.	FIRE PROTECTION	IV.K-15
3.	SCHOOL SERVICES	IV.K-24
4.	PARKS AND RECREATION	IV.K-43
5.	LIBRARIES	IV.K-50
L.	TRAFFIC/TRANSPORTATION	IV.L-1
M.	PARKING	IV.M-1
V.	GENERAL IMPACT CATEGORIES	
A.	SUMMARY OF SIGNIFICANT UNAVOIDABLE IMPACTS	V.A-1
B.	GROWTH INDUCING IMPACTS	V.B-1
C.	IMPACTS FOUND TO BE LESS THAN SIGNIFICANT	V.C-1
VI.	ALTERNATIVES TO THE PROPOSED PROJECT	VI.A-1
A.	INTRODUCTION	VI.A-1
B.	NO PROJECT ALTERNATIVE	
1.	CONTINUATION OF EXISTING LAND USES	VI.B.1-1
2.	REASONABLY FORSEEABLE FUTURE DEVELOPMENT (FOOTBALL STADIUM/CASINO) ALTERNATIVE	VI.B.2-1
3.	REASONABLY FORSEEABLE FUTURE DEVELOPMENT (CONVENTION CENTER/HOTEL/CASINO) ALTERNATIVE	VI.B.3-1
C.	ALTERNATIVE RU 800	VI.C-1
D.	ALTERNATIVE RU 1,000	VI.D-1
E.	ALTERNATIVE RU 3,500	VI.E-1

F. MAXIMUM HOUSING ALTERNATIVE.....	VI.F-1
G. ENVIRONMENTALLY SUPERIOR ALTERNATIVE.....	VI.G-1
VII. BIBLIOGRAPHY	
A. REFERENCES AND PERSONS CONSULTED.....	VII.A-1
B. PREPARERS OF THE EIR.....	VII.B-1
C. ABBREVIATIONS AND ACRONYMS.....	VII.C-1

**APPENDICES (Appendices C-1 through I are bound under separate cover)**

APPENDIX A-1:	Notice of Preparation (NOP) and NOP Response Letters
APPENDIX A-2:	Initial Study Checklist
APPENDIX A-3:	Public Agency and Service Provider Response Letters
APPENDIX B:	<u>Hollywood Park Redevelopment Project Air Quality and Noise Impact Report, Terry A. Hayes &amp; Associates, LLC., August 21, 2008.</u>
APPENDIX C-1:	<u>Final Report – Geologic Investigation of The Potrero Fault, Hollywood Park, Inglewood CA, Geomatrix Consultants, Inc., December 2005.</u>
APPENDIX C-2:	<u>Geotechnical Evaluation For Environmental Impact Report, Proposed Residential And Commercial Development, Hollywood Park Redevelopment, Inglewood, CA, Group Delta Consultants, Inc. March 30, 2007.</u>
APPENDIX D-1:	<u>Soil Management Plan, Hollywood Park Racetrack &amp; Casino, 1050 S. Prairie Avenue, Inglewood CA, Erler &amp; Kalinowski, Inc. July 3, 2007.</u>
APPENDIX D-2:	<u>Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, CA, ENVIRON International Corporation, April 11, 2005.</u>
APPENDIX E-1:	<u>Historic Resources Technical Report, Historic Resources Survey, Evaluation, and Analysis of Project Impacts – Final – Hollywood Park Project, CA, Page &amp; Turnbull, Inc. July 24, 2007.</u>
APPENDIX E-2:	<u>Record Search for the Hollywood Park Redevelopment Project, City of Inglewood, South Central Coastal Information Center – California Historical Resources Information System, California State University – Fullerton,</u>

Department of Archaeology, July 24, 2007.

- APPENDIX F-1: Hollywood Park Project, Utilities and Infrastructure Technical Report, Hall & Foreman, August 29, 2008.
- APPENDIX F-2: Hollywood Park Project, Hydrology Study, Hall & Foreman, June 16, 2008.
- APPENDIX F-3: Hollywood Park Water Quality Technical Report, Geosyntec Consultants, May 2008.
- APPENDIX F-4: Hollywood Park Manmade Lake – Public Health Concerns Mitigation Technical Memorandum, Pace Advanced Water Engineering, June 12, 2008.
- APPENDIX F-5: Utility Provider Will-Serve Letters
- APPENDIX F-6: Water Supply Assessment, Hollywood Park Redevelopment Project, Inglewood, California, Bucknam & Associates, Inc., September 2008.
- APPENDIX G-1: Draft Traffic Impact Study, Hollywood Park Redevelopment Project, City of Inglewood CA, Linscott, Law & Greenspan Engineers, August 1, 2008.
- APPENDIX G-2: Shared Parking Analysis, Hollywood Park Redevelopment Project, City of Inglewood CA, Walker Parking Consultants, September 25, 2007.
- APPENDIX H: The Future of Horseracing In California: Can The Industry Without “Racinos.”LECG, October 12, 2005.
- APPENDIX I: Potential for the Hollywood Park Redevelopment Project to Cause “Urban Decay” Technical Memorandum, HR&A Advisors, Inc., June 2, 2008.

**FIGURES**

Figure II-1	Regional and Project Vicinity Map .....	II-2
Figure II-2	Aerial Photograph .....	II-3
Figure II-3	Existing Site Plan .....	II-7
Figure II-4	Preliminary Land Use Plan .....	II-9
Figure II-5	Illustrative Renderings of the Proposed Project, Views 1 and 2 .....	II-13
Figure II-6	Illustrative Renderings of the Proposed Project, Views 3, 4 and 5 .....	II-14

Figure II-7	Preliminary Building Heights Limit Map .....	II-15
Figure II-8	Conceptual Circulation Map .....	II-19
Figure III-1	Related Projects Location Map .....	III-8
Figure IV.A-1	Views of the Project Site, (Views 1, 2 and 3) .....	IV.A-2
Figure IV.A-2	Views of the Project Site, (Views 4, 5 and 6) .....	IV.A-3
Figure IV.A-3	Views of the Project Site (Views 7, 8 and 9) .....	IV.A-4
Figure IV.A-4	Views of the Project Site (Views 10, 11 and 12) .....	IV.A-5
Figure IV.A-5	Views of the Project Site (Views 13, 14 and 15) .....	IV.A-8
Figure IV.A-6	Views of the Project Site (Views 16, 17 and 18) .....	IV.A-10
Figure IV.A-7	Views of the Project Site (Views 19, 20 and 21) .....	IV.A-11
Figure IV.A-8	Views of the Project Site (Views 22, 23 and 24) .....	IV.A-12
Figure IV.A-9	Views of the Project Site (Views 25, 26 and 27) .....	IV.A-13
Figure IV.A-10	Views of the Project Site (Views 28, 29 and 30) .....	IV.A-14
Figure IV.A-11	Views of the Project Site (Views 31, 32 and 33) .....	IV.A-15
Figure IV.A-12	Views of the Project Site (Views 34, 35 and 36) .....	IV.A-16
Figure IV.A-13	Views of the Project Site (Views 37, 38 and 39) .....	IV.A-17
Figure IV.B-1	South Coast Air Basin .....	IV.B-6
Figure IV.B-2	Air Monitoring Areas .....	IV.B-13
Figure IV.B-3	Sensitive Receptor Locations .....	IV.B-17
Figure IV.C-1	USGS Quadrangle Vicinity Map .....	IV.C-3
Figure IV.C-2	Locations of Geologic/Hydrologic Borings .....	IV.C-4
Figure IV.C-3	Cross-Section of Geologic/Hydrologic Boring A-A' .....	IV.C-6
Figure IV.C-4	Cross-Section of Geologic/Hydrologic Boring B-B' .....	IV.C-7

Figure IV.C-5	Cross-Section of Geologic/Hydrologic Boring C-C' .....	IV.C-8
Figure IV.C-6	Alquist Priolo Special Fault Studies Zone Map .....	IV.C-11
Figure IV.C-7	RUZ Zone Across Training Track .....	IV.C-12
Figure IV.C-8	Estimated Bottom Elevation of Removal.....	IV.C-18
Figure IV.D-1	Former Oil Field and Oil and Gas Well Location Map .....	IV.D-7
Figure IV.D-2	Groundwater Sampling Locations .....	IV.D-11
Figure IV.E-1	Historic Photograph of Hollywood Park, 1938.....	IV.E-6
Figure IV.E-2	Historic Photographs of Hollywood Park, circa 1939-1940 .....	IV.E-8
Figure IV.E-3	Historic Photographs of Hollywood Park, circa 1954-1957 .....	IV.E-10
Figure IV.E-4	Current Photographs of Hollywood Park (Photos 1-3).....	IV.E-13
Figure IV.E-5	Current Photographs of Hollywood Park (Photos 4-6).....	IV.E-15
Figure IV.E-6	Current Photographs of Hollywood Park (Photos 7-10).....	IV.E-16
Figure IV.E-7	Current Photographs of Hollywood Park (Photos 11-14).....	IV.E-18
Figure IV.E-8	Current Photographs of Hollywood Park (Photos 15-17).....	IV.E-20
Figure IV.F-1	Existing and Proposed Drainage Infrastructure Map .....	IV.F-5
Figure IV.F-2	Proposed Water Quality Treatment Control Areas .....	IV.F-19
Figure IV.F-3	Conceptual Landscape Plans for Treatment Parks .....	IV.F-20
Figure IV.F-4	Conceptual Illustrations of Typical Vegetated BMPs .....	IV.F-22
Figure IV.G-1	A-Weighted Decibel Scale .....	IV.G-2
Figure IV.G-2	Noise Monitoring Locations .....	IV.G-8
Figure IV.G-3	LAX Noise Contours .....	IV.G-9
Figure IV.G-4	Sensitive Receptor Locations.....	IV.G-11
Figure IV.H-1	Hollywood Park Redevelopment Census Tract and General Plan Map .....	IV.H-5



Figure IV.I-1	LAX Airport Influence Area .....	IV.I-5
Figure IV.I-2	Hawthorne Airport Influence Area .....	IV.I-7
Figure IV.I-3	Existing General Land Use Designations .....	IV.I-9
Figure IV.I-4	Manchester-Prairie and Century Redevelopment Project Areas Maps .....	IV.I-14
Figure IV.I-5	City of Inglewood Zoning Map .....	IV.I-17
Figure IV.J-1	Existing and Proposed Water Infrastructure Map .....	IV.J-16
Figure IV.J-2	Existing and Proposed Sewer Infrastructure Map .....	IV.J-33
Figure IV.J-3	Existing and Proposed Electricity, Natural Gas and Telecom Infrastructure .....	IV.J-41
Figure IV.K-1	City of Inglewood Police Service Area And Police Station Location Map .....	IV.K-2
Figure IV.K-2	L.A. County Fire Department Fire Stations within the City of Inglewood .....	IV.K-16
Figure IV.K-3	IUSD School Location Map .....	IV.K-26
Figure IV.K-4	Elementary School Location Map .....	IV.K-27
Figure IV.K-5	Middle School Location Map .....	IV.K-28
Figure IV.K-6	High School Location Map .....	IV.K-29
Figure IV.K-7	Parks and Recreation Map .....	IV.K-44
Figure IV.K-8	Library Location Map .....	IV.K-51
Figure IV.L-1	Study Intersection Location Map .....	IV.L-6
Figure IV.L-2	Existing Lane Configurations .....	IV.L-7
Figure IV.L-3	Existing Transit Lines .....	IV.L-10
Figure IV.L-4	Existing Traffic Volumes – Weekday AM Peak Hour .....	IV.L-13
Figure IV.L-5	Existing Traffic Volumes – Weekday PM Peak Hour .....	IV.L-14
Figure IV.L-6	Existing Traffic Volumes – Saturday Mid-Day Peak Hour .....	IV.L-15
Figure IV.L-7	Project Traffic Volumes – Weekday AM Peak Hour .....	IV.L-21

Figure IV.L-8 Project Traffic Volumes – Weekday PM Peak Hour ..... IV.L-22

Figure IV.L-9 Project Traffic Volumes – Saturday Mid-Day Peak Hour ..... IV.L-23

Figure IV.L-10 Related Projects Traffic Volumes – Weekday AM Peak Hour..... IV.L-25

Figure IV.L-11 Related Projects Traffic Volumes – Weekday PM Peak Hour ..... IV.L-26

Figure IV.L-12 Related Projects Traffic Volumes – Saturday Mid-Day Peak Hour ..... IV.L-27

Figure IV.L-13 Existing With Ambient Growth Traffic Volumes – Weekday AM Peak Hour .. IV.L-40

Figure IV.L-14 Existing With Ambient Growth Traffic Volumes – Weekday PM Peak Hour ... IV.L-41

Figure IV.L-15 Existing With Ambient Growth Traffic Volumes – Sat. Mid-Day Peak Hour ... IV.L-43

Figure IV.L-16 Alternative Internal Circulation Plan With Cut-Through Streets That Was  
Considered But Rejected..... IV.L-48

Figure IV.L-17 Alternative Internal Circulation Plan In Context With Broad  
Arterial Street System ..... IV.L-49

Figure IV.L-18 Proposed Project’s Internal Circulation Plan ..... IV.L-50

Figure IV.L-19 Future With Project Traffic Volumes – Weekday AM Peak Hour ..... IV.L-53

Figure IV.L-20 Future With Project Traffic Volumes – Weekday PM Peak Hour..... IV.L-54

Figure IV.L-21 Future With Project Traffic Volumes – Saturday Mid-Day Peak Hour..... IV.L-55

Figure IV.L-22 Future Cumulative Traffic Volumes – Weekday AM Peak Hour..... IV.L-67

Figure IV.L-23 Future Cumulative Traffic Volumes – Weekday PM Peak Hour ..... IV.L-68

Figure IV.L-24 Future Cumulative Traffic Volumes – Saturday Mid-day Peak Hour ..... IV.L-69

Figure IV.L-25 Phasing of Intelligent Transportation System Intersections ..... IV.L-76

Figure IV.M-1 Permitted Street Parking ..... IV.M-7

**TABLES**

Table I-1 Summary of Environmental Impacts and Mitigation Measures .....I-8

Table II-1 Land Use Program Equivalency Scenarios ..... II-11

Table III-1	Related Projects List .....	III-3
Table IV.B-1	State and National Ambient Air Quality Standards .....	IV.B-7
Table IV.B-2	Ambient Air Quality Data in Project Vicinity .....	IV.B-12
Table IV.B-3	Existing Carbon Monoxide Concentrations .....	IV.B-15
Table IV.B-4	Estimated Annual Greenhouse Gas Emissions .....	IV.B-20
Table IV.B-5	SCAQMD Daily Construction Emissions Thresholds.....	IV.B-21
Table IV.B-6	SCAQMD Daily Operational Emissions Thresholds.....	IV.B-22
Table IV.B-7	Regional Construction Emissions – Unmitigated .....	IV.B-25
Table IV.B-8	Localized Construction Emissions – Unmitigated .....	IV.B-25
Table IV.B-9	Daily Operations Emissions – Future Weekday Conditions.....	IV.B-27
Table IV.B-10	Daily Operations Emissions – Future Weekend Conditions.....	IV.B-27
Table IV.B-11	2006 and 2014 Carbon Monoxide Concentrations .....	IV.B-29
Table IV.B-12	Carbon Monoxide Concentrations Near Proposed Parking Structures .....	IV.B-30
Table IV.B-13	Regional Construction Emissions – Mitigated.....	IV.B-37
Table IV.B-14	Localized Construction Emissions – Mitigated .....	IV.B-38
Table IV.B-15	Comparison of Project Characteristics to Examples of GHG Reduction Measures in OPR Technical Guidance .....	IV.B-40
Table IV.C-1	Parameters for Grading, Pavement and Infiltration Structure Design .....	IV.C-19
Table IV.F-1	Summarized Flows.....	IV.F-6
Table IV.F-2	Allowable Runoff Rates.....	IV.F-7
Table IV.F-3	Project Drainage Areas and Treatment Control BMP’s.....	IV.F-18
Table IV.F-4	Predicted Average Annual Stormwater Runoff Volumes .....	IV.F-25
Table IV.F-5	Predicted Average Annual Concentrations and Load for Modeled Pollutants of Concern .....	IV.F-30

Table IV.F-6	Comparison of Predicted Concentrations with Water Quality Criteria and Concentrations Observed in Dominguez Channel .....	IV.F-31
Table IV.F-7	USEPA Recreational Water Quality Standards .....	IV.F-42
Table IV.G-1	Existing Estimated Community Noise Equivalent Level.....	IV.G-4
Table IV.G-2	Maximum Residential Noise Levels .....	IV.G-5
Table IV.G-3	FTA Vibration Impact Criteria .....	IV.G-6
Table IV.G-4	Existing Noise Levels .....	IV.G-7
Table IV.G-5	Existing Estimated Community Noise Equivalent Level - Weekday .....	IV.G-12
Table IV.G-6	Existing Estimated Community Noise Equivalent Level - Weekend .....	IV.G-13
Table IV.G-7	Land Use Compatibility for Community Noise Environments.....	IV.G-15
Table IV.G-8	Maximum Noise Levels of Construction Equipment.....	IV.G-17
Table IV.G-9	Outdoor Construction Noise Levels .....	IV.G-18
Table IV.G-10	Construction Noise Levels – Unmitigated .....	IV.G-18
Table IV.G-11	Vibration Velocities for Construction Equipment .....	IV.G-19
Table IV.G-12	2006 and 2014 Estimated Community Noise Equivalent Level-Weekday .....	IV.G-21
Table IV.G-13	2006 and 2014 Estimated Community Noise Equivalent Level–Weekend .....	IV.G-22
Table IV.G-14	Construction Noise Levels – Mitigated .....	IV.G-27
Table IV.H-1	SCAG’s 2008 RTP Population & Housing Projections for the City of Inglewood 2005-2020 .....	IV.H-3
Table IV.H-2	SCAGs 2007 Final Regional Housing Needs Assessment for the City of Inglewood .....	IV.H-9
Table IV.H-3	Hollywood Park Simulcast Meet Handle and Attendance for the Years 2002 through 2006 When No Live Racing .....	IV.H-14
Table IV.H-4	Summary of Horse Stall Occupancy for Southern California Racing Facilities .....	IV.H-15

Table IV.H-5	Summary of Existing Employment and Proposed Net Employment Generation .....	IV.H-16
Table IV.H-6	Population and Housing Estimates .....	IV.H-20
Table IV.H-7	SCAG’s Compass Growth Vision Consistency Analysis .....	IV.H-25
Table IV.H-8	Population, Housing and Employment Impacts Under the Proposed Land Use Equivalency Scenarios.....	IV.H-31
Table IV.H-9	Cumulative Population and Housing Impacts.....	IV.H-32
Table IV.I-1	Comparison of Project Characteristics to RCPG Policies.....	IV.I-21
Table IV.I-2	Consistency Analysis of the Los Angeles County LAX Airport Land Use Plan.....	IV.I-27
Table IV.I-3	Equivalency Program Land Use Change .....	IV.I-34
Table IV.J-1	Existing Water Infrastructure Serving the Project Site.....	IV.J-17
Table IV.J-2	Estimated Potable Water Demand for Proposed Project.....	IV.J-19
Table IV.J-3	Water Supply and Demand Comparison for the Proposed Project .....	IV.J-21
Table IV.J-4	Estimated Recycled Water Demand for Proposed Project.....	IV.J-23
Table IV.J-5	Existing Wastewater Infrastructure Adjacent to the Project Site.....	IV.J-34
Table IV.J-6	Estimated Wastewater Generation by Proposed Project.....	IV.J-36
Table IV.J-7	Estimated Wastewater Generation Under the Proposed Equivalency Program....	IV.J-37
Table IV.J-8	Projected Cumulative Wastewater Generation .....	IV.J-38
Table IV.J-9	Existing Electrical and Natural Gas Infrastructure .....	IV.J-42
Table IV.J-10	Estimated Electricity Consumption by Proposed Project .....	IV.J-45
Table IV.J-11	Estimated Natural Gas Consumption by Proposed Project.....	IV.J-47
Table IV.J-12	Electricity Demands Under the Proposed Land Use Equivalency Program .....	IV.J-49
Table IV.J-13	Natural Gas Demands Under the Proposed Land Use Equivalency Program.....	IV.J-49

---

Table IV. J-14	Projected Cumulative Electricity Consumption.....	IV.J-50
Table IV.J-15	Projected Cumulative Natural Gas Consumption .....	IV.J-51
Table IV.J-16	Estimated Construction and Demolition Debris .....	IV.J-54
Table IV.J-17	Estimated Operational Solid Waste Generation by Proposed Project.....	IV.J-55
Table IV.J-18	Estimated Solid Waste Generation Under the Proposed Land Use Equivalency Program .....	IV.J-57
Table IV.J-19	Projected Cumulative Solid Waste Generation.....	IV.J-57
Table IV.K-1	City of Inglewood Crime Statistics.....	IV.K-3
Table IV.K-2	IUSD School Information.....	IV.K-25
Table IV.K-3	IUSD Closest Schools Enrollment for School Years 2003/04 through 2007/08.....	IV.K-30
Table IV.K-4	IUSD Closest Schools Growth for School Years 2003/04 Through 2007/08 .....	IV.K-30
Table IV.K-5	IUSD Closest Schools Capacity and Enrollment (Year 2007/08) .....	IV.K-31
Table IV.K-6	Pupil Per Home Ratios.....	IV.K-35
Table IV.K-7	Estimated Student Generation by Proposed Project.....	IV.K-37
Table IV.K-8	Closest Elementary Schools Capacity and Enrollment.....	IV.K-38
Table IV.K-9	Middle and High School Capacity and Enrollment .....	IV.K-38
Table IV.K-10	Estimated Student Generation Under the Proposed Land Use Equivalency Program .....	IV.K-40
Table IV.K-11	Parks and Recreational Facilities Serving the Project Site .....	IV.K-45
Table IV.K-12	Inglewood Public Library Department Operating Statistics .....	IV.K-50
Table IV.L-1	Existing Transit Routes.....	IV.L-9
Table IV.L-2	Summary of Volume to Capacity Ratios and Levels of Service.....	IV.L-31
Table IV.L-3	Congestion Management Plan Intersection Traffic Impact Assessment.....	IV.L-56

Table IV.L-4	Congestion Management Plan Freeway Traffic Impact Assessment.....	IV.L-57
Table IV.L-5	Project Trip Generation During Peak Construction Activities .....	IV.L-60
Table IV.M-1	City of Inglewood Parking Requirements.....	IV.M-8
Table IV.M-2	Shared Parking Demand – Overall Peak Weekday Sample Program Tenant Mix.....	IV.M-12
Table IV.M-3	Shared Parking Demand – Overall Peak Weekend Sample Program Tenant Mix .....	IV.M-13
Table VI.B.1-1	Assessment of the No Project Alternative to Meet the Project Objectives.....	VI.B.1-10
Table VI.B.2-1	Stadium Event Profile .....	VI.B.2-2
Table VI.B.2-2	Estimated Water Consumption by the Stadium Alternative .....	VI.B.2-10
Table VI.B.2-3	Estimated Wastewater Generation by the Stadium Alternative .....	VI.B.2-11
Table VI.B.2-4	Estimated Electricity Demands – Stadium Alternative.....	VI.B.2-12
Table VI.B.2-5	Estimated Natural Gas Consumption – Stadium Alternative.....	VI.B.2-13
Table VI.B.2-6	Estimated Construction Demolition Debris – Stadium Alternative .....	VI.B.2-14
Table VI.B.2-7	Estimated Operational Solid Waste Generation – Stadium Alternative .....	VI.B.2-14
Table VI.B.2-8	Athletic Stadium Alternative Weekday Project Trip Generation.....	VI.B.2-17
Table VI.B.2-9	Athletic Stadium Alternative Weekend Project Trip Generation.....	VI.B.2-18
Table VI.B.2-10	City of Inglewood Commercial Parking Requirements – Stadium Alternative .....	VI.B.2-19
Table VI.B.2-11	Assessment of Stadium Alternative to Meet the Project Objectives.....	VI.B.2-19
Table VI.B.3-1	Estimated Water (Potable) Consumption by the Convention Center Alternative .....	VI.B.3-9
Table VI.B.3-2	Estimated Wastewater Generation by the Convention Center Alternative .....	VI.B.3-9
Table VI.B.3-3	Estimated Electricity Demands - Convention Center Alternative .....	VI.B.3-10

Table VI.B.3-4	Estimated Natural Gas Consumption - Convention Center Alternative .....	VI.B.3-11
Table VI.B.3-5	Estimated Construction and Demolition Debris – Convention Center Alternative .....	VI.B.3-11
Table VI.B.3-6	Estimated Operational Solid Waste Generation – Convention Center Alternative .....	VI.B.3-12
Table VI.B.3-7	Convention Center Alternative Weekday Trip Generation .....	VI.B.3-14
Table VI.B.3-8	Convention Center Alternative Weekend Trip Generation .....	VI.B.3-15
Table VI.B.3-9	City of Inglewood Commercial Parking Requirements – Convention Center Alternative .....	VI.B.3-16
Table VI.B.3-10	Assessment of Convention Center Alternative to Meet the Project Objectives .....	VI.B.3-17
Table VI.C-1	Development Summary of Alternative RU 800 .....	VI.C-1
Table VI.C-2	Summary of Employment Generation – Alternative RU-800 .....	VI.C-8
Table VI.C-3	Estimated Water Consumption – Alternative RU 800 .....	VI.C-11
Table VI.C-4	Estimated Wastewater Generation – Alternative RU 800 .....	VI.C-12
Table VI.C-5	Estimated Electricity Consumption – Alternative RU 800 .....	VI.C-12
Table VI.C-6	Estimated Natural Gas Consumption – Alternative RU 800 .....	VI.C-13
Table VI.C-7	Estimated Operational Solid Waste Generation – Alternative RU 800 .....	VI.C-14
Table VI.C-8	Estimated Student Generation by Alternative RU 800 .....	VI.C-15
Table VI.C-9	Alternative RU 800 Weekday Trip Generation .....	VI.C-17
Table VI.C-10	Alternative RU 800 Weekend Trip Generation .....	VI.C-17
Table VI.C-11	Assessment of the Alternative RU 800 to Meet the Project Objectives .....	VI.C-19
Table VI.D-1	Development Summary of Alternative RU 1,000 .....	VI.D-1
Table VI.D-2	Estimated Water (Potable) Consumption by Alternative RU 1,000 .....	VI.D-9
Table VI.D-3	Estimated Wastewater Generation by Alternative RU 1,000 .....	VI.D-10



Table VI.D-4	Estimated Electricity Consumption – Alternative RU 1,000 .....	VI.D-11
Table VI.D-5	Estimated Natural Gas Consumption – Alternative RU 1,000 .....	VI.D-11
Table VI.D-6	Construction Solid Waste Generation – Alternative RU 1,000 .....	VI.D-12
Table VI.D-7	Estimated Operational Solid Waste Generation by Alternative RU 1,000 .....	VI.D-13
Table IV.D-8	Estimated Student Generation by Alternative RU 1,000 .....	VI.D-14
Table VI.D-9	Alternative RU 1,000 Weekday Trip Generation .....	VI.D-15
Table VI.D-10	Alternative RU 1,000 Weekend Trip Generation .....	VI.D-16
Table VI.D-11	Assessment of Alternative RU 1,000 to Meet the Project Objectives .....	VI.D-17
Table VI.E-1	Development Summary of Alternative RU 3,500 .....	VI.E-1
Table VI.E-2	Water Demands under the Proposed Land Use Equivalency Scenario .....	VI.E-10
Table VI.E-3	Water Supply and Demand Comparison for Alternative RU 3,500 .....	VI.E-11
Table VI.E-4	Estimated Wastewater Generation by Alternative RU 3,500 .....	VI.E-12
Table VI.E-5	Estimated Electricity Demands – Alternative RU 3,500 .....	VI.E-13
Table VI.E-6	Estimated Natural Gas Consumption – Alternative RU 3,500 .....	VI.E-14
Table VI.E-7	Construction Solid Waste Generation – Alternative RU 3,500 .....	VI.E-15
Table VI.E-8	Estimated Operational Solid Waste Generation by Alternative RU 3,500 .....	VI.E-16
Table IV.E-9	Estimated Student Generation by Alternative RU 3,500 .....	VI.E-18
Table VI.E-10	Alternative RU 3,500 Weekday Trip Generation .....	VI.E-19
Table VI.E-11	Alternative RU 3,500 Weekend Trip Generation .....	VI.E-20
Table VI.E-12	Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service – AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour .....	VI.E-22
Table VI.E-13	Assessment of Alternative RU 3,500 to Meet the Project Objectives .....	VI.E-33
Table VI.F-1	Development Summary of Maximum Housing Alternative .....	VI.F-2

Table VI.F-2 Water Demands Under the Maximum Housing Alternative..... VI.F-13

Table VI.F-3 Estimated Wastewater Generation by Maximum Housing Alternative..... VI.F-15

Table VI.F-4 Estimated Electricity Demands – Maximum Housing Alternative..... VI.F-16

Table VI.F-5 Estimated Natural Gas Consumption – Maximum Housing Alternative..... VI.F-17

Table VI.F-6 Estimated Construction Solid Waste Generation –  
Maximum Housing Alternative ..... VI.F-18

Table VI.F-7 Estimated Operational Solid Waste Generation by  
Maximum Housing Alternative ..... VI.F-19

Table IV.F-8 Estimated Student Generation by Maximum Housing Alternative..... VI.F-21

Table VI.F-9 Assessment of Maximum Housing Alternative to Meet the  
Project Objectives ..... VI.F-23

Table VI.G-1 Project Alternatives Environmental Impact Comparison ..... VI.G-2

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# I. INTRODUCTION/EXECUTIVE SUMMARY

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## INTRODUCTION/OVERVIEW OF THE CEQA PROCESS

The purpose of this Draft Environmental Impact Report (EIR) is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the Hollywood Park Redevelopment Project (the “Proposed Project”) located at 1050 S. Prairie Avenue within portions of the Manchester-Prairie and Century Redevelopment Constituent Project Areas of the Merged In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century, and Imperial-Prairie Redevelopment Project Area in the City of Inglewood.

The Proposed Project will require certain discretionary approvals by the City of Inglewood (the “City”) and other governmental agencies. Therefore, the Proposed Project is subject to environmental review requirements under the California Environmental Quality Act (CEQA).<sup>1</sup> This EIR has been prepared in accordance with CEQA (Public Resources Code Section 21000 *et seq.*) and the CEQA Guidelines (*California Code of Regulations*, Title 14, Section 15000 *et seq.*). The City of Inglewood is the Lead Agency under CEQA for the Proposed Project. This determination is made in accordance with Section 15367 of the CEQA Guidelines, which defines the lead agency as the public agency with the principal responsibility for carrying out or approving a project and conducting the environmental review.

As described in Section 15121 (a) and 15362 of the State CEQA Guidelines, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, either through the imposition of mitigation measures or through the implementation of reasonable alternatives to the project.<sup>2</sup> The purpose of this Draft EIR, therefore, is to focus the discussion on those potential effects on the environment of the Proposed Project which the Lead Agency has determined may be significant.

This Draft EIR was prepared in accordance with Section 15151 of the State CEQA Guidelines, which defines the standards for EIR adequacy:

*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

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<sup>1</sup> Public Resources Code Sections 21000-21177.

<sup>2</sup> California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.

## Notice of Preparation

Comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, were solicited through a Notice of Preparation (NOP) process. The NOP for the Draft EIR was circulated for a minimum 30-day review period that began on November 1, 2007 and ended on December 3, 2007. A copy of the NOP and responses to the NOP are provided in Appendix A to this Draft EIR.

## NOP Comment Letters

In response to the NOP, the Lead Agency received fifteen comment letters from various state, regional and local agencies. Two local interests also provided comment letters. The State of California Office of Planning and Research (State Clearinghouse) provided a response acknowledging receipt of the NOP and provided a State Clearinghouse Number for tracking purposes. The SCH number for this EIR is 2007111018. The State of California Department of Transportation, District 7, Regional Planning provided comments with respect to traffic impacts (see Section IV.K.L, Traffic/Transportation). The State of California Department of Conservation, Division of Oil, Gas, & Geothermal Resources provided comments regarding on and off-site oil wells within the Portero Oil Field (see Section IV.C. Geology/Soils). The State of California Native American Heritage Commission provided comments regarding potential archaeological resources including the potential for discovery of Native American remains (see Section IV.E., Cultural Resources). The Southern California Association of Governments provided a comment letter identifying this project as a regionally significant project (See Section IV.I., Land Use and IV.H. Population Housing and Employment). The State of California Department of Toxic Substances Control provided comments with guidance for preliminary endangerment assessment preparation for contaminated soils (see Section IV.C., Geology/Soils). The South Coast Air Quality Management District provided comments with respect to addressing the project's potential impacts to regional air quality (see Section IV.B., Air Quality). The County Sanitation Districts of Los Angeles County provided comments with respect to addressing the project's potential impact upon sewerage facilities. The Sage Institute Inc. (on behalf of Inglewood Unified School District), provided a comment pertaining to the project's potential impacts to public schools (see Section IV.K-3, Schools), The City of Inglewood Police Department provided two response letters with guidance and recommendations with respect to addressing the projects impact upon the City's police department (see Section IV.K-1, Police Services). The County of Los Angeles Department of Public Works provided comments with respect to stormwater (see Section IV.F., Hydrology/Water Quality, solid waste (see Section IV.J-4, Solid Waste), hazardous waste (see Section IV.D., Hazardous Materials and Risk of Upset), and traffic (see Section IV.L, Traffic/Transportation). The County of Los Angeles Fire Department provided comments with respect to the projects impact upon fire protection services (see Section IV.K-2, Fire Protection). The Shelter Partnership, a non-profit organization dedicated to ending homelessness, provided comments requesting to be kept informed of the project and questioned how the City of Inglewood plans to implement Senate Bill (SB) 2, Fair Share Housing Legislation, within its Housing Element Update. Cecil Carpio, a local resident, provided comments pertaining to the EIR process and public agency notification (see Section I., Introduction), project alternatives (see Section VI., Alternatives to the Proposed Project,

and project phasing (see Section II., Project Description). Each of the comment letters referenced above are provided in their entirety in Appendix A-3 to this EIR.

### **Environmental Issues Analyzed in the Draft EIR**

Based on a review of environmental issues by the Planning Department, this Draft EIR analyzes the following environmental impact areas:

- Aesthetics (Urban Design, Light and Glare, Shade/Shadow)
- Air Quality
- Geology and Soils
- Hazardous Materials/Risk of Upset
- Cultural Resources
- Hydrology and Water Quality
- Land Use Planning
- Noise
- Population, Housing and Employment
- Public Utilities (Water, Wastewater, Natural Gas, Electricity, Solid Waste)
- Public Services (Fire, Police, Schools, Recreation and Parks, Libraries)
- Traffic/Transportation
- Parking.

Section V.C of this Draft EIR lists the environmental issues that were determined not to be significantly impacted by the Proposed Project and, therefore, are not analyzed in detail herein. These issues include:

- Agriculture;
- Biological Resources; and
- Mineral Resources.

### **Environmental Review Process**

This Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations beginning October 9, 2008 through November 24, 2008 (46 days). All comments or questions about the Draft EIR should be addressed to:

Mr. Sheldon Curry  
Assistant City Administrator  
The City of Inglewood  
1 Manchester Boulevard  
Inglewood, CA 90301  
Tel: (319) 412-5230

Following public review of the Draft EIR, a Final EIR will be prepared in response to any written comments received during the public review period. The Final EIR will be available for public review prior to its certification by the decision-makers in a public hearing.

According to Public Resources Code Section 21081, the Lead Agency must make specific Findings of Fact (“Findings”) before approving the Final EIR when the Final EIR identifies significant environmental impacts that may result from a project. The purpose of the Findings is to establish the connection between the contents of the Final EIR and the action of the Lead Agency with regard to approval or rejection of the proposed project. Prior to approval of a project, one of three findings must be made, as required by Section 15091 of the CEQA guidelines:

- Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the Final EIR;
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency; or
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

Additionally, according to Public Resources Code Section 21081.6, for projects in which significant impacts will be avoided or lessened by mitigation measures, the Lead Agency must include a Mitigation Monitoring and Reporting Program (“MMRP”). The purpose of the MMRP is to ensure compliance with required mitigation during implementation of the proposed project. Environmental impacts may not always be mitigated to a less than significant level. When this occurs, impacts are considered significant and unavoidable. If a public agency approves a project that has significant and unavoidable impacts, the agency shall state in writing the specific reasons for approving the project based on the Final EIR and any other information in the public record. This is termed a “Statement of Overriding Considerations” and is used to explain the specific reasons why the benefits of a proposed project make its unavoidable environmental effects acceptable.

## **ORGANIZATION OF THE DRAFT EIR**

This Draft EIR is organized into seven sections, as follows:

Section I. Introduction/Executive Summary: This section provides an introduction to the environmental review process per CEQA, a summary of the Proposed Project description, areas of controversy, issues to be resolved, alternatives to the Proposed Project, and environmental impacts and mitigation measures.

Section II. Project Description: This section provides a complete detailed description of the Proposed Project including the project location, objectives, characteristics, and required discretionary actions.

Section III. Related Projects: This section provides a list of related projects proposed in the project area to analyze “cumulative impacts,” as defined in Section 15355 of the State CEQA Guidelines.

Section IV. Environmental Impact Analysis: Sections IV.A through IV.M are the focus of this Draft EIR. Each environmental issue contains a discussion of existing conditions for the project area, an assessment and discussion of the significance of impacts associated with the Proposed Project, project design features, mitigation measures, cumulative impacts, and level of impact significance after mitigation.

Section V. General Impact Categories: This section provides a summary of the projects significant and unavoidable impacts, growth inducing impacts and impacts that are deemed to be less than significant and thus do not warrant detailed analysis in the EIR.

Section VI. Alternatives to the Proposed Project: As required by CEQA, this section includes an analysis of a reasonable range of alternatives to the Proposed Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the project and that would avoid or substantially lessen any of the significant effects of the project.

Section VII. Preparers of the EIR and Persons Consulted, References and Acronyms: This section presents a list of City and other agencies and consultant team members that contributed to the preparation of the Draft EIR, a list of written materials used in the preparation of this Draft EIR, and definitions for all of the acronyms and abbreviations used in this Draft EIR.

## **PROPOSED PROJECT**

The Proposed Hollywood Park Redevelopment Project consists of the redevelopment of the approximate 238-acre Racetrack Grandstand and the Pavilion/Casino and the construction of a new mixed-use development. The Proposed Project includes demolition of most of the improvements and structures on the Project Site, including the Hollywood Park Racetrack and grandstand, and the new construction of approximately 2,995 dwelling units, 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, a 300-room hotel including 20,000 sf of related meeting space, and 10,000 sf of community serving uses for the Home Owners’ Association (HOA). The Pavilion/Casino will be renovated at its existing location on the Project Site and reconfigured as a maximum 120,000 sf

Casino/gambling facility. As part of the Development Agreement, a four-acre site is proposed to be made available to a public entity for civic uses, which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility with respect to construction and operation costs for the respective entity. Approximately 25 acres will be designated for recreation/open space for the development, including 2.5 acres developed as an HOA Recreational Facility. The two racetrack infield lakes currently existing on the Project Site will be removed and recreated on the Project Site as an integral component of the proposed Master Plan. (All unit counts and square footages are approximate). The residential product types will include single family, townhomes, stacked flats, condominium buildings and residential units over retail in the town center. At least 90 percent of the residential development will be for-sale (i.e. ownership) residential product.

The Proposed Project is intended to serve as an energetic collection of new residential neighborhoods, connected by expansive open space, to a vibrant shopping, dining and entertainment district. The urban design strives to place all uses within easy walking distance of each other. Construction of the Proposed Project on the currently underutilized site will benefit the surrounding area through the provision of a mix of retail, residential and commercial uses that are currently not available within the City. The provision of housing would be a welcome addition to the community, and would serve to improve the regional jobs/housing balance. The Proposed Project will result in a net increase of 517 jobs. Inglewood is an area that is in need of additional parks and recreation spaces and the Proposed Project would help address this need by providing for 25 acres of land as park, recreation and open space to serve the project residents as well as the broader community. The Proposed Project would also provide a 4-acre site that can be used for civic uses such as a school, library, joint use facility, or community center. The Proposed Project will contribute to the quality of life of the existing neighborhood by providing uses that are compatible with adjacent land use patterns, reducing overall ambient noise on weekdays and significantly reducing light and glare impacts when compared with the existing uses.

## **ALTERNATIVES TO THE PROPOSED PROJECT**

This Draft EIR considers a range of alternatives to the Proposed Project to provide informed decision-making in accordance with Section 15126.6 of the State CEQA Guidelines. The alternatives analyzed in this Draft EIR include:

- No Project Alternative – Continuation of Existing Land Use: This alternative analyzes the environmental consequences of the on-going operation of the existing Hollywood Park Racetrack and Casino without any new discretionary requests.
- No Project Alternative – Reasonably Foreseeable Future Development (Football Stadium/Casino) Alternative: This Alternative evaluates a theoretical scenario in which the Proposed Project does not go forward, but an alternative project consistent with the underlying zoning regulations is developed. The development of an athletic stadium is considered a reasonably foreseeable development because (1) it is consistent with the current zoning designation, and (2) it represents a development proposal that was



previously proposed and analyzed in an EIR in 1995. This alternative analyzes the impacts of demolishing the existing Grandstand, Racetrack and Barn Areas, while retaining the Casino and constructing an approximate 65,000 seat Athletic Stadium.

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

this Alternative includes the development of a maximum of 3,500 dwelling units on the Project Site, a maximum of 525 affordable dwelling units (to be provided off-site within the Merged Redevelopment Project Area), approximately 620,000 sf of retail use, approximately 120,000 sf of casino use, a 300-room hotel with 20,000 sf of meeting room space, approximately 25,000 sf of office space, approximately 25 acres of open space, and approximately 10,000 sf of community space. A four-acre site would also be made available for civic uses which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility.

## **ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES**

The following pages summarize the various environmental impacts associated with the construction and operation of the Proposed Project. Mitigation measures are recommended for significant environmental impacts, and the level of impact after mitigation is also identified.

**Table 1-1  
Summary of Environmental Impacts and Mitigation Measures**

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<b>IV.A. AESTHETICS (URBAN DESIGN/VIEWS/LIGHT &amp; GLARE)</b>		
<b>Views and Urban Design.</b> There are no designated scenic highways, natural elements nor unique scenic resources within the City of Inglewood. Views from the Proposed Project into adjacent residential land uses would be buffered by a landscape buffer between adjacent properties. Broad leaf, evergreen trees would provide shade and privacy, offering a more comfortable atmosphere for residents on either side of the property line. As such, impacts to scenic views and vistas would be less than significant.	MM A-1. The Proposed Project shall incorporate low-level directional lighting at the ground, podium, and parking levels of all structures to ensure that architectural, parking and security lighting does not spill onto adjacent residential properties. Compliance with this measure shall be demonstrated at Plot Plan Review approval for each building permit.	Less Than Significant Impact.
<b>Impacts to Light and Glare.</b> Light and glare from the Project Proposed Project would be substantially less intrusive than the lighting impacts generated by the existing uses on the Project Site. As such, light and glare impacts would be less than significant.	MM A-2. The proposed park and open space areas shall incorporate low-level directional lighting for pedestrian safety and security purposes in a manner that minimizes light trespass onto adjacent properties to the maximum extent feasible. Compliance with this measure shall be demonstrated at Plot Plan review for development of the open space and park areas.	Less Than Significant Impact.
<b>Landscape and Open Space Elements.</b> Approximately 25 acres of land will be designated as recreation/open space (see Section IV.K-4, Parks and Recreation, for a complete discussion). As a result, the proposed open space would be an attractive visual attribute to the Proposed Project resulting in a net beneficial aesthetic impact.	MM A-3. The Proposed Project's façades and windows shall be constructed of non-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.	Less Than Significant Impact.
<b>Project Signage and Illumination.</b> The proposed Specific Plan includes a signage program to achieve a unified and cohesive overall appearance. Compliance with the proposed signage development standards and design guidelines in the Specific Plan will ensure that signage furthers the design goals of the Merged Redevelopment Plan, and will ensure that visual impacts associated with the Project's signage are reduced to less than significant levels.		Less Than Significant Impact.
<b>Shade and Shadow Impacts.</b> Most of the structures proposed would be generally range from 25 to 60 feet above finished grade, not including architectural features. The hotel structure would be the highest structure at approximately 150 feet above grade. Due to the set back from the		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>property line and roadway widths, none of the Proposed Project's structures would cast shadows upon residences or other adjacent land uses for more than 3 hours during the summer or winter months and the project's shade and shadow impacts would be less than significant.</p>		
<p><b>Land Use Equivalency Program.</b> The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses within the Hollywood Park Specific Plan Area. The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. All mitigation measures to minimize visual quality impacts would be implemented. Therefore, development under all of the Equivalency Scenarios would have a visual character that is similar to and would be consistent with that of the Proposed Project, and would result in less than significant impacts.</p>		<p>Less Than Significant Impact.</p>
<p><b>IV.B AIR QUALITY</b></p>		
<p><b>Construction Phase Air Quality Impacts</b></p>		
<p><b>Regional Emissions.</b> Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Specifically, construction emissions would exceed the SCAQMD regional daily threshold limits for VOC, NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such the Project's construction related impacts would be significant.</p>	<p>MM B-1. Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.</p> <p>MM B-2. Track-out shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday.<sup>3</sup></p>	<p>Significant Unavoidable Impact.</p>
<p><b>Localized Emissions.</b> Construction of the Project would generate PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>x</sub>. Localized CO emissions would be less than the SCAQMD daily significance thresholds. However, localized emissions of PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>2</sub> would exceed the localized thresholds. The maximum localized emissions would be temporary and would generally</p>	<p>MM B-3. A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages</p>	<p>Significant Unavoidable Impact.</p>

<sup>3</sup> Track-out is defined by the SCAQMD as any material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that has been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions (Rule 1156(c)(28)).

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>occur during the heaviest periods of construction activity. Nonetheless, localized construction emissions would result in a significant air quality impact.</p>	<p>before vehicles exit the project site.</p>	
<p><b>Toxic Air Contaminants.</b> The proposed project would be required to comply with SCAQMD Rule 1403 (Asbestos Emissions From Demolition/Renovation Activities), which specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities. Thus, construction activity would result in a less-than-significant toxic air contaminant impact.</p> <p>A diesel health risk assessment (HRA) was completed to determine the risk posed to sensitive receptors from construction activity. The HRA calculated the lifetime carcinogenic risk associated with heavy-duty construction equipment, on-site haul truck movement, on-site haul truck idling, and off-site haul truck travel on the local roadway system. The HRA resulted in an unmitigated carcinogenic risk of 30 persons in one million, which is greater than the ten persons in one million significance threshold. As such, construction-related diesel emissions would result in a significant impact.</p>	<p>MM B-4. All haul trucks hauling soil, sand, and other loose materials off-site shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114.</p> <p>MM B-5. All haul trucks hauling soil, sand, and other loose materials off-site shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).</p> <p>MM B-6. Traffic speeds on unpaved roads shall be limited to 15 miles per hour.</p> <p>MM B-7. Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.</p> <p>MM B-8. Heavy-equipment operations shall be suspended during first and second stage smog alerts.</p>	<p>Less Than Significant Impact.</p> <p>Significant Unavoidable Impact.</p>
<p><b>Odors.</b> Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the project site; resulting in a less-than-significant impact.</p>	<p>MM B-9. On-site stock piles of debris, dirt, or rusty materials shall be covered or watered at least twice per day.</p> <p>MM B-10. Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.</p> <p>MM B-11. Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.</p> <p>MM B-12. Heavy-duty trucks shall be prohibited from idling in excess</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>of five minutes, both on- and off-site.</p> <p>MM B-13. Construction parking shall be configured to minimize traffic interference.</p> <p>MM B-14. Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours, as feasible.</p> <p>MM B-15. Architectural coatings shall be purchased from a super-compliant architectural coating manufacturer as identified by the SCAQMD (<a href="http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf">http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf</a>).</p> <p>MM B-16. Spray equipment with high transfer efficiency, such as the electrostatic spray gun or manual coatings application (e.g., paint brush and hand roller), shall be used to reduce VOC emissions.</p>	
<b>Operational Phase Air Quality Impacts</b>		
<p><b>Regional Emissions.</b> Long-term operational project emissions would be generated by area sources, such as natural gas combustion and consumer products (e.g., aerosol sprays) and mobile sources. Motor vehicles generated by the proposed project would be the predominate source of long-term project emissions. Specifically, operation of the Project would generate VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. Weekday and weekend regional operational emissions would exceed SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, regional operational emissions would result in a significant air quality impact.</p>	<p>MM B-17. The Applicant shall install automatic lighting on/off controls and energy-efficient lighting for office spaces.</p> <p>MM B-18. The Applicant shall provide informational packets to new residents within the development locating nearby public transportation options.</p>	<p>Significant Unavoidable Impact.</p>
<p><b>Concurrent Emissions.</b> Later stages of project construction could occur</p>		<p>Significant Unavoidable</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>concurrently with the occupancy of the earlier stages of development. Construction emissions combined with operational emissions would result in concurrent emissions that exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, the Proposed Project would result in a significant emissions impact associated with concurrent emissions.</p>		Impact.
<p><b>CO Concentrations.</b> The USEPA CAL3QHC micro-scale dispersion model was used to calculate CO concentrations at the six study intersections for a localized CO hotspot analysis for 2014 “no project” and “project” conditions. The maximum one-hour and eight-hour CO concentrations under “project” conditions would be 3 ppm and 1.8 to 2.1 ppm, respectively, at worst-case sidewalk receptors. These emissions would be below the State one- and eight-hour standards of 20 ppm and 9.0 ppm, respectively. Thus, a less-than-significant impact is anticipated and no significant increase in CO concentrations at sensitive receptor locations is expected.</p>		Less Than Significant Impact.
<p><b>Toxic Air Contaminants.</b> Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The proposed project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). As such, the proposed project would not release substantial amounts of TACs, and impacts would be less than significant.</p>		Less Than Significant Impact.
<p><b>Odors.</b> The project site would be developed with residential, hotel, casino/gaming, civic, open spaces, retail and office/commercial space and not land uses that are typically associated with odor complaints. On-site trash receptacles would be located and maintained in a manner that promotes odor control, and no adverse odor impacts are anticipated from these types of land uses. Impacts would be less than significant.</p>		Less Than Significant Impact.
<p><b>AQMP Consistency.</b> The Proposed Project would not be consistent with the AQMP due to a technical inconsistency with the SCAG growth projections underlying the AQMP. However, many of the design aspects of the project are consistent with the goals of the AQMP. The proposed</p>		Significant Unavoidable Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>mixed-use development would (a) potentially reduce regional vehicle miles traveled by decreasing residential to retail trip lengths, and (b) would be located near heavily traveled roadways that are serviced by the L.A. County MTA. Despite the consistency with the spirit and intent of the AQMP, it would not be consistent with the growth assumptions included in the AQMP. Therefore, impacts will be significant and unavoidable.</p>		
<p><b>Greenhouse Gas Emissions.</b> Greenhouse gas emissions associated with the Proposed Project have been identified and quantified. These emissions are associated with increased electricity consumption, natural gas combustion and mobile source emissions due to project-generated traffic. The Proposed Project would emit an estimated additional 53,227 tons per year of CO<sub>2</sub> equivalent emissions above the existing development levels. It is not possible at this time to quantify the exact reductions in greenhouse gas emissions anticipated from the smart growth and sustainability design features of the Proposed Project. By incorporating energy and VMT reducing project design features and example GHG reduction measures provided in the Governor’s Office of Planning and Research technical advisory on CEQA and climate change, the Proposed Project will result in lower GHG emission rates compared to current standards and practices. Given the lack of standards and the proposed project features consistency with the State and City’s goals, the contribution to the cumulative impact of global climate change is considered less than significant.</p>		Less Than Significant Impact.
<p><b>Land Use Equivalency Program.</b> Potential changes in land use under the Equivalency Program would have no substantial effect on the air quality analysis because only the use is changing. Regional and local air quality impacts during operations under the Equivalency Program would be comparable to those of the Proposed Project as the trip generation and trip distribution characteristics of the Equivalency Program and the Proposed Project would also be comparable. Potential sources of toxic air contaminants and odors under the Equivalency Program would be the same as those associated with the Proposed Project, and, thus, impacts would be the same. Concurrent construction and operations emissions under the Equivalency Program would also be comparable to the</p>		Significant Unavoidable Impact.



Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Proposed Project as levels of construction activity and traffic would also be comparable. In addition, as is the case with the Proposed Project, the Equivalency Program would be comparable in consistency findings with adopted plans and policies. Overall, the Equivalency program, as is the case with the Proposed Project, would result in significant and unavoidable impacts.</p>		
<b>IV.C GEOLOGY/SOILS</b>		
<p><b>Seismic Hazards – Fault Rupture.</b> Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Inglewood. The Potrero Fault, which is considered an active surface fault trace and is delineated on the State’s Alquist-Priolo Earthquake Fault Zoning Map, crosses a portion of the Proposed Project Site. The fault trenching program conducted for the Project identified a Restricted Use Zone (RUZ) for the Potrero Fault, which crosses the northeastern most portion of the Proposed Project. While the possibility of surface fault rupture affecting the proposed development exists, the Project would include development of open space and recreational areas within the RUZ. Structures intended for human occupancy are not proposed within the mapped RUZ area. Any suitable structures (see Section IV.C for a complete list of suitable structures) placed within the RUZ would be required to incorporate appropriate engineering design to mitigate movement resulting from potential future displacement related to the Potrero Fault. No land use restrictions were identified for the Proposed Project Site outside of the RUZ. Thus, impacts on the Proposed Project Site from any surface fault rupture would be less than significant.</p>	<p><i>Code-Required Measures</i></p> <p>MM C-1. All buildings and structures shall be designed and constructed in conformance with the applicable regulations and standards of the latest edition of the Inglewood Building Division pursuant to the latest edition of the California Building Code, Los Angeles County Fire Code, seismic design standards, and applicable state requirements which are in effect at the time of building permit issuance.</p> <p><i>Project-Specific Mitigation Measure</i></p> <p>In accordance with the <u>Geotechnical Evaluation for Environmental Impact Report, Proposed Residential and Commercial Development, Hollywood Park Redevelopment, Inglewood, California</u> (the “Geotechnical Report”) prepared by Group Delta Consultants, dated March 29, 2007, specific mitigation measures are enumerated as follows, and shall be completed to the satisfaction of the City of Inglewood Department of Building and Safety:</p>	<p>Less Than Significant Impact.</p>
<p><b>Seismic Hazards – Seismic-Induced Ground Shaking.</b> The Project Site is located in a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. In this respect, development of the Proposed Project would expose new residents, employees and visitors of the proposed dwelling units, commercial establishments, and could result in potentially significant adverse effects, including the risk of loss, injury, or death involving strong seismic ground</p>	<p>MM C-2. Prior to the start of grading, demolition will be required to remove any existing improvements, including pavement</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>shaking. However, the potential for seismic hazards would not be higher than in other areas of the City of Inglewood or elsewhere in the region. Such risks have also been incorporated into the project specific seismic design and engineering plans for the Proposed Project and impacts would be less than significant.</p>	<p>and structures. Any void created from the demolition should be properly backfilled to the limits determined by the project geotechnical engineer. Any soils loosened or disturbed during the demolition should also be removed. The existing old wells may also need to be re-abandoned or vented in accordance with applicable regulations. The presence and location of all existing utilities on the property should be identified. Precautions should be taken to remove, relocate or protect existing utilities, as appropriate.</p>	
<p><b>Seismic Hazards – Seismic-Induced Settlement and Liquefaction.</b> The Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-induced ground failure associated with settlement and/or liquefaction. Soils on the Project Site would not be susceptible to liquefaction. The site is not located within a State of California Liquefaction Hazard Zone (CDMG 1998). Therefore, the potentials for liquefaction, lateral spreading, and seismic compaction to occur at the site is considered to be remote and impacts are less than significant.</p>	<p>MM C-3. Prior to the start of grading, all vegetation and topsoil should be stripped. The vegetation should be removed from the site. The topsoil may be stockpiled and reused in planned landscape areas. In addition, any trees and shrubs should be cleared, so that no roots larger than 1-inch in diameter remain. Any soils loosened during removal of tree/shrubs should also be removed.</p>	<p>Less Than Significant Impact.</p>
<p><b>Landslides.</b> The Project Site is not located within a City-designated landslide area or an area identified as subject to seismic slope instability. Due to the relatively flat topography of the Project Site and surrounding area, potential impacts associated with landslides would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Erosion/Loss of Top Soil.</b> Construction of the Proposed Project has the potential to result in the erosion of soil during site preparation and construction activities, erosion would be reduced by implementation of appropriate erosion controls during grading. With implementation of the applicable grading and building permit requirements and the application of construction best management practices (BMPs), a less-than-significant impact would occur with respect to erosion or loss of topsoil.</p>	<p>MM C-4. Uncertified fill and soft native clayey soils can not be used for foundation support, and therefore, need to be removed and replaced with structural fill, consistent with the findings of site specific geotechnical evaluation.</p>	<p>Less Than Significant Impact.</p>
<p><b>Expansive Soils.</b> The upper clayey soils on the Project Site are expansive and should not be used within two feet of the bottom of pavement or other flatwork. With adherence to the geotechnical engineering recommendations provided in the Geotechnical Report and the mitigation measures, impacts with respect to expansive soils would be less than significant.</p>	<p>MM C-5. Prior to construction, field infiltration testing shall be conducted at locations where infiltration structures are planned.</p>	<p>Less Than Significant Impact.</p>
<p><b>Site Preparation/Grading/Earth Removal.</b> Prior to the start of grading,</p>	<p>MM C-6. All grading should conform to the requirements of the City of Inglewood. The grading contractor is responsible for</p>	<p>Less Than Significant</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>demolition will be required to remove any existing improvements, including pavement and structures. Buried remnants of previous construction could be encountered anywhere on the site, including foundations, walls, slabs, basements, mud pits, cesspools, tanks and utilities. With adherence to the geotechnical engineering recommendations in the Geotechnical Report, and the mitigation measures identified herein, impacts with respect to site preparation, grading and earth removals would be less than significant.</p>	<p>notifying the project Geotechnical Engineer of a pre-grading meeting prior to the start of grading operations and anytime that the operations are resumed after an interruption.</p>	<p>Impact.</p>
<p><b>Geologic Hazards.</b> A potentially significant adverse impact could occur with respect to causing or accelerating geologic hazards associated with the accidental discovery of undocumented and/or abandoned oil wells which could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Potentially adverse impacts associated with this hazard could be reduced to a less-than-significant level by abandoning accidentally encountered wells according to the current requirements of the California Division of Oil and Gas.</p>	<p>MM C-7. Prior to site grading, uncertified fill and soft native soils should be removed and replaced with structural fill. It should be anticipated that unsuitable oversized debris may be present in the existing fill on-site. The actual limits for removals should be determined by the project Geotechnical Engineer depending on the actual conditions encountered, consistent with the findings of a site specific geotechnical evaluation.</p>	<p>Less Than Significant Impact.</p>
<p><b>Groundwater.</b> Groundwater was encountered during subsurface investigations on the Project Site between approximately 70 to 170 feet below ground surface (bgs). The proposed soils removal ranges between 3 feet and 22.5 feet bgs, well above the shallowest recorded depth to groundwater of 72.45 feet bgs. Therefore, ground water is not likely to be encountered within the depth of the proposed excavation. It is possible, however, that locally perched groundwater could be encountered and has the potential to impact the proposed development during construction. Compliance with the geotechnical recommendations provided by the project engineer would effectively mitigate any adverse impacts associated with groundwater to less-than-significant levels.</p>	<p>MM C-8. During earthwork activities, the bottoms of completed excavations shall be observed by the project Geotechnical Engineer, while it is proof-rolled with loaded equipment. Any loose or yielding soils shall be over-excavated and recompacted to the limits determined by the project Geotechnical Engineer.</p>	<p>Less Than Significant Impact.</p>
<p><b>Land Use Equivalency Program.</b> The proposed Equivalency Program allows for specific limited exchanges in types of land uses occurring on the Project Site. Potential changes in land use under the Equivalency Program would have no substantial effect on the proposed earth moving activities, including impacts from seismic hazards, landslides, erosion and topsoil, expansive soils, site preparation, grading and earth removal and their associated impacts because only the use of the land is changing.</p>	<p>MM C-9. Structural fill should consist of predominantly sandy soils, and should be free of expansive clay, rock greater than 3 inches in maximum size, debris and other deleterious materials. All structural fill should be compacted to at least 95 percent of the maximum dry density determined by ASTM D 1557-91. Fill placed in nonstructural and landscape areas should be compacted to at least 90 percent.</p> <p>MM C-10. All earthwork and grading shall be performed under the</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>With implementation of the applicable mitigation measures, geologic and soil impacts attributable to the Equivalency Program would be less than significant.</p>	<p>observation of the project Geotechnical Engineer. Compaction testing of the fill soils shall be performed at the discretion of the project Geotechnical Engineer. Testing shall be performed for approximately every 2 feet in fill thickness or 500 cubic yards of fill placed, whichever occurs first. If specified compaction is not achieved, additional compactive effort, moisture conditioning, and/or removal and recompaction of the fill soils will be required.</p> <p>MM C-11. All materials used for asphalt concrete and base shall conform to the 2000 "Green Book" or the equivalent, and shall be compacted to at least 95 percent relative compaction.</p> <p>MM C-12. If, in the opinion of the Geotechnical Engineer, Contractor, or Owner, an unsafe condition is created or encountered during grading, all work in the area shall be stopped until measures can be taken to mitigate the unsafe condition. An unsafe condition shall be considered any condition that creates a danger to workers, onsite structures, on-site construction, or any off-site properties or persons.</p> <p>MM C-13. Groundwater encountered during temporary excavations shall be controlled using shallow trenches, sumps and pumps. In general, temporary excavations up to 3 feet deep may stand in vertical cuts; sandier layers should be sloped. Construction slopes in the parking Area and Barn Area should be made with an inclination of 1 (H) to 1(V). Construction slopes in the Track Area should be made with an inclination of 1.5 (H) to 1 (V). If the above-</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>recommended slopes are not feasible due to site restrictions, or if surcharge loads other than a nominal value of 240 psf due to traffic loads exist adjacent to the excavation, a flatter slope or temporary shoring may be needed. Earth pressure can be provided if temporary shoring is to be used.</p> <p>MM C-14. Surcharge loads, such as vehicular traffic, heavy construction equipment, and stockpiled materials, should be kept away from the top of temporary excavations a horizontal distance at least equal to the depth of excavation. Surface drainage should be controlled and prevented from running down the slope face. Poned water should not be allowed within the excavation. Workmen should be adequately protected within temporary excavations. Construction equipment and foot traffic should be kept off excavation slopes to minimize sloughing.</p> <p>MM C-15. All excavation slopes and shoring systems should meet the minimum requirements of the Occupational Safety and Health Association (OSHA) Standards. Maintaining safe and stable slopes on excavations is the responsibility of the contractor and will depend on the nature of the soils and groundwater conditions encountered and his method of excavation. Excavations during construction should be carried out in such a manner that failure or ground movement will not occur. The contractor should perform any additional studies deemed necessary to supplement the information contained in this report for the purpose of</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation				
	<p>planning and executing his excavation plan.</p> <p>MM C-16. It should be anticipated that a site specific design-level geotechnical report for each new project within the tract will be required. Specifically, after detailed building plans have been developed for each area of the Project Site, additional geotechnical explorations, testing, and analyses shall be performed, as warranted, in order to develop building-specific foundation recommendations. The Project shall be designed and constructed in accordance with the recommendations provided in these additional site specific geotechnical reports.</p> <p>MM C-17. The expansion potential of subgrade soils within foundation depth under building pads should be tested in building specific site investigations, and recommendations regarding expansive soils should be presented in site - specific geotechnical reports.</p> <p>MM C-18. Soil corrosivity should be tested in building specific site investigations. This potential should be considered in the design and protection of underground metal utilities.</p> <p>MM C-19. Assuming R-values of 15 after grading, the following pavement sections for Traffic Index (TI) values of 5, 6, and 7 are recommended:</p> <table border="0" data-bbox="1003 1279 1667 1382"> <thead> <tr> <th data-bbox="1003 1279 1289 1312"><u>Traffic Index (TI) Section</u></th> <th data-bbox="1339 1279 1667 1312"><u>Thickness (Feet) AC Over AB</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="1100 1352 1115 1377">5</td> <td data-bbox="1383 1352 1577 1377">0.25 AC/0.65 AB</td> </tr> </tbody> </table>	<u>Traffic Index (TI) Section</u>	<u>Thickness (Feet) AC Over AB</u>	5	0.25 AC/0.65 AB	
<u>Traffic Index (TI) Section</u>	<u>Thickness (Feet) AC Over AB</u>					
5	0.25 AC/0.65 AB					

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>6 0.30 AC/0.85 AB</p> <p>7 0.35 AC/1.05 AB</p> <p>Traffic Index value 5 is recommended for car parking and non-truck driveways. Traffic index of 6 or higher may be used for truck areas or for the streets. The upper 24 inches of sub grade supporting pavements should be compacted to at least 95 percent relative compaction (ASTM D1557-1990). For PCC pavements in areas of some truck traffic, a pavement section of 6 in PCC over 12 inch of aggregate base is recommended. Actual pavement section thickness is subject to verification based on the “R” values of on-site soils, which are expected to be tested after grading.</p> <p>MM C-20. Proper quality control of grading is required. The Project Applicant shall ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the Project Geotechnical Report are implemented where applicable.</p>	
<b>IV.D HAZARDOUS MATERIALS-RISK OF UPSET</b>		
<b>Construction Impacts</b>		
<p><b>Routine Transport, Use, or Disposal of Potentially Hazardous Materials.</b> The Proposed Project is anticipated to require the routine transport, use, and disposal of cleaning solvents, fuels, and other hazardous materials commonly associated with construction projects. All hazardous materials encountered or used during demolition,</p>	<p>MM D-1. The Project Applicant shall implement the RWQCB-approved SMP environmental risk management protocols under RWQCB oversight during the Project.</p> <p>MM D-2. COPCs encountered at the Property in soil and soil gas</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>grading/excavation, and construction activities would be handled in accordance with all applicable local, State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste, based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. As compliance with existing regulations is mandatory for all development projects, adherence to all applicable rules and regulations would reduce potentially significant impacts with respect to routine transport, use, and disposal of hazardous materials during construction to less-than-significant levels.</p>	<p>during the Project and implementation of the SMP shall be investigated, and concentrations of COPCs determined to be above the Property-specific criteria listed in the SMP will be remediated as part of the Project in accordance with the SMP approved by the RWQCB.</p>	
<p><b>Accidental Release of Hazardous Materials.</b> There are four areas at the Project site that will be addressed prior to, or during, grading with RWQCB oversight and approval, and three general areas at the Project Site that will be addressed during demolition. Within these four areas, hazardous materials were detected in soil gas and soil at concentrations above the Property-specific criteria defined in the SMP. Remediation of these small, localized areas of soil impact will be performed prior to or during Property grading, likely by excavation and off-site disposal of soil identified to contain COPCs above the criteria. These four areas will be addressed as part of the Project with oversight and approval from the RWQCB. Remaining fuel USTs used during Hollywood Park operations will be emptied and removed in accordance with the closure requirements of local agencies, including LAFD, LADPW, SCAQMD, and City of Inglewood.</p>	<p>MM D-3. Groundwater is not expected to be encountered during work activities associated with the Project. Groundwater on the Property, if discovered during the Project to contain COPCs, will be addressed as required by RWQCB.</p> <p>MM D-4. Former oil and gas wells at the Property shall be located, inspected, and reabandoned, if necessary, as required by DOGGR consistent with proximate land use.</p> <p>MM D-5. Prior to the issuance of the building demolition permit by City of Inglewood, the Project Applicant will submit to the City of Inglewood proof of certification from its selected contractor showing qualification to handle asbestos and lead-based paint. Proper removal and remediation actions will be undertaken in conformance with the regulations of the South Coast Air Quality Management District and the State of California, Division of Occupational Health and Safety.</p>	<p>Less Than Significant Impact.</p>
<p><b>Sensitive Receptors, Including Schools.</b> The Project Site is located near several sensitive receptors with respect to hazardous materials (i.e., schools, residences, day care facilities, etc.). As such, the Project could result in a potentially significant impact related to exposure of nearby students and neighbors to accidental release of the following hazardous material during demolition, excavation, and construction activities: ACM, LBP, contents of underground storage tanks, soil containing COPCs above Property-specific criteria defined in the SMP, and natural gas, if not property managed. Risks associated with accidental release of potentially hazardous materials during construction would be reduced to less-than-significant levels and such materials would not be expected to</p>	<p>MM D-6. Any COPC-containing soil stockpiled at the Project site shall be stored in accordance with the SMP approved by the RWQCB and in such a manner that underlying soils are not cross-contaminated. This could be accomplished by the use of plastic sheeting placed under and on top of the stockpiled</p>	<p>Less Than Significant Impact.</p>



Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
endanger sensitive receptors in the project vicinity.	materials, or other suitable methods. The management, treatment, or disposal of such material shall comply with all federal, state, and local regulations related to hazardous waste, as applicable. All stockpiled materials shall be protected in order to prevent materials from being washed into storm drains, in accordance with the Project storm water pollution prevention plan (“SWPPP”).  MM D-7. Handling and removal of hazardous materials will comply with federal, state and local regulations, which include requirements for disposal of hazardous materials at facilities licensed to accept such waste.	
<b>Listed Hazardous Materials Sites.</b> The Project Site address is listed on one or more government regulatory databases. Potentially hazardous chemicals such as fuels, paints, solvents and oils used during Hollywood Park operations on the Property will be removed from the Project Site during the demolition phase of the Project, along with ACM and LBP as required prior to the demolition of structures.		Less Than Significant Impact.
<b>Emergency Response Plans.</b> The Proposed Project is located along Century Boulevard, a designated evacuation route in the City of Inglewood. Development of the Project Site may require temporary and/or partial street closures along Century Boulevard due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans and would be conducted in accordance with the City’s permitting process. Therefore, the Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.		Less Than Significant Impact.
<b>Aircraft Overflight.</b> The Project is located within 2 miles of Los Angeles International Airport. The Project would be developed in accordance with the development guidelines of the applicable Airport Land Use Plan and would not negatively impact safe air navigation or the safety of people residing or working in the project area.		Less Than Significant Impact.
<b>Operational Impacts.</b>		
<b>Routine Transport, Use, or Disposal of Potentially Hazardous Materials.</b> Minor quantities of potentially hazardous materials will be stored or used on the Property as part of the planned residential, commercial and recreational land uses; no industrial land uses are planned. Limited quantities of potentially hazardous materials would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations. Therefore, impacts would be less than significant.	No mitigation measures are required.	Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p><b>Accidental Release of Hazardous Materials.</b> Minor quantities of potentially hazardous materials commonly associated with commercial and residential uses are expected to be stored or used on the Property as part of the completed Project. Accidental releases of potentially hazardous materials, such as janitorial or household chemicals associated with the residential and commercial land uses proposed could occur, but such releases would be minor and, thus, considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Listed Hazardous Materials Sites.</b> Following completion of the activities defined in the SMP, no known areas of the Property should exist that contain COPCs in soil or soil gas at concentrations above their respective Property-specific soil or soil gas criteria listed in the SMP, unless such areas were determined to the satisfaction of the RWQCB to present no unacceptable risk to human health, the environment, or groundwater quality (e.g., deeper or covered soils, where there are none). As such, areas where soil and soil gas concentrations meet the criteria for residential land use listed in the SMP will be acceptable for unrestricted land use. If the Project Applicant chooses to apply the commercial/industrial land use criteria in specific areas of the Property where such criteria would be consistent with the planned land use, the potentially exposed populations, and potentially complete exposure pathways, these areas may be subject to land use restrictions determined pursuant to future agreement by the Project Applicant and RWQCB.</p>		<p>Less Than Significant Impact.</p>
<p><b>Sensitive Receptors, Including Schools.</b> The Project Site is located adjacent to and in the immediate vicinity of residences and schools that have been identified as sensitive receptors with respect to potential releases of hazardous materials. No substantial quantities of hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Proposed Project and such materials would not be expected to endanger sensitive receptors in the project vicinity. Therefore, impacts would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Land Use Equivalency Program.</b> The Land Use Equivalency Program allows for specific limited exchanges in the types of land uses. The potential risk of exposure to safety and health hazards for Project development would be the same under the Land Use Equivalency</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Program. Very minor variations regarding foundation types or in the preparation of landscaping areas could occur, however, such variations would be within the range of construction procedures anticipated to occur with the Proposed Project. In addition, development under the Land Use Equivalency Program would not cause or exacerbate any hazardous material/risk of upset impacts that would occur under the Proposed Project.</p>		
<b>IV.E CULTURAL RESOURCES</b>		
<p><b>Historic Resources.</b> As none of the buildings on the Project Site are classified as a historic resource pursuant to CEQA or under the National Register of Historic Places or the California Register of Historical Places, the Project will have a less than significant impact on historic resources.</p>	<p>MM E-1. Should any unknown archaeological materials be encountered during the course of the project development, construction activities shall be halted in the area of discovery to allow the monitor to determine the significance of such materials. The services of a professional archaeologist shall be secured to assess and evaluate the impact upon any significant archaeological resources and make recommendations to the Planning Director. Copies of any archaeological surveys, studies or reports documenting any archaeological resources found or recovered on site shall be submitted to the South Central Coastal Information Center, California Historical Resources Information System, California State University, Fullerton, Department of Anthropology.</p>	<p>Less Than Significant Impact.</p>
<p><b>Archeologic Resources.</b> The Proposed Project would not cause a substantial adverse change in the significance of an archaeological or resource. There are no known recorded archaeological sites or isolates on the Project Site or within ¼ mile of the Project Site. As such, the likelihood of encountering any significant archaeological resources during the grading and excavation phase is low. However, Mitigation Measure E-1 is recommended to ensure that measures are in place to avoid or mitigate any unforeseen impacts to archaeological resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.</p>		<p>Less Than Significant Impact.</p>
<p><b>Interred Human Remains.</b> The Proposed Project would not disturb any human remains. Nevertheless, a potentially significant impact could occur if the grading activities results in the accidental discovery of any unrecorded and/or unknown buried human remains, including those of Native Americans. Implementation of Mitigation Measure E-2 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to Native American remains in the unlikely event that such remains are accidentally discovered during the earthwork activities.</p>		<p>Less Than Significant Impact.</p>
<p><b>Paleontologic Resources.</b> No known unique paleontologic resources or sites are recorded or known to be located on site or in the immediate project vicinity. Nevertheless, unforeseen impacts to paleontological</p>	<p>MM E-2. In the event of the unlikely accidental discovery or recognition of any human remains during construction, the following steps should be taken: (1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: (A) The Los Angeles County Coroner is contacted to determine that no investigation of the cause of</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>resources may result from project implementation due to the extent of grading during the construction phases. As such, implementation of Mitigation Measure E-3 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to paleontologic resources should any such materials be accidentally discovered during the earthwork activities.</p>	<p>death is required, and (B) If the coroner determines the remains to be Native American the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall notify the person or persons it believes to be the most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98 and in accordance with California Health and Safety Code Section 7050.5. Excavation and/or earthwork activities may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains or cultural resources.</p>	
<p><b>Land Use Equivalency Program.</b> All of the recommended mitigation measures to minimize impacts on cultural and archaeological resources would be applicable to the Equivalency Program, as well as the Proposed Project. Since excavation and building placement would be the same as the Proposed Project, and the mitigation measures would be the same, potential impacts on cultural and archaeological resources would be the same. Thus, with respect to cultural and archaeological resources, the implementation of the Equivalency Program would result in less than significant impacts.</p>	<p>MME-3. If any paleontological materials are encountered during the course of the project development, the project shall be halted in the area of discovery and the services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<b>IV.F HYDROLOGY/WATER QUALITY</b>		
<p><b>Hydrology/Storm Drains.</b> The Proposed Project would include construction of a new gravity storm drainage network on-site to collect stormwater flows. Storm drain runs will be sized with sufficient hydraulic capacity to accommodate the design hydrology. The minimum size of main line conduit routes shall be 18 or 24-inches for ease of maintenance, unless otherwise approved by the District/City. These will be installed under roadways within the public right of way for ease of maintenance. This new system will be maintained and operated by City of Inglewood Department of Public Works upon completion of construction.</p>	<p>MM F-1. All waste shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.</p>	<p>Less Than Significant Impact.</p>
<p><b>Stormwater Runoff Volumes.</b> Mean annual runoff volumes are generally expected to increase with development. The increase is largely a result of an overall increase in percent of impervious surface area at the Project Site. This is primarily due to the fact that runoff from 50 percent the existing area is currently almost completely retained on site (e.g., captured in the existing lakes and re-used for irrigation on site). For example, the effective imperviousness of the existing Project Site is approximately 47 percent, while proposed imperviousness is approximately 73 percent. Runoff volume from an area is directly proportional to the area's percent imperviousness. Proposed project design features include site design, source control, and treatment control BMPs in compliance with the SUSMP requirements in order to reduce impacts to less than significant levels.</p>	<p>MM F-2. Leaks, drips and spills shall be cleaned immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.</p> <p>MM F-3. Hosing down of pavement at material spills shall be prohibited. Dry cleanup methods shall be used whenever possible.</p> <p>MM F-4. Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or covered with tarps or plastic sheeting.</p>	<p>Less Than Significant Impact.</p>
<p><b>Flooding.</b> The Project Site is within Flood Zone C of the FEMA map, which denotes areas subject to minimal flooding and determined to be outside the 500-year plain. As a result, the Proposed Project results in a less than significant impact with respect to placing housing within a 100-year flood plain.</p>	<p>MM F-5. Gravel approaches shall be used where truck traffic is frequent to reduce soil compaction and limit the tracking of sediment into streets.</p>	<p>Less Than Significant Impact.</p>
<p><b>Water Quality Impacts</b></p>	<p>MM F-6. All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.</p>	
<p><b>Construction Impacts.</b> Three general sources of potential short-term construction-related stormwater pollution associated with construction</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>projects are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation via storm runoff or mechanical equipment, and subsurface activities may also impact groundwater quality through the release of construction related chemicals into the groundwater. Implementation of the BMPs in the project SWPPP and compliance with the County of Los Angeles' discharge requirements for water entering the County's storm drains would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments, such as, and not limited to: nutrients, heavy metals, turbidity, pesticides, and trash and debris. These measures would ensure that the project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.</p>	<p>MM F-7. Prior to issuance of any grading, building or B-Permit, a Stormwater Pollution Prevention Plan (SWPPP) shall be prepared for the Proposed Project. The SWPPP shall identify temporary Best Management Practices (BMPs) to be implemented in accordance with the General Construction Permit issued by the Regional Water Quality Control Board (RWQCB).</p>	
<p><b>Dewatering.</b> Construction on the Project Site may require dewatering and non-stormwater related discharges. For example, dewatering may be necessary for the construction of the lake features, if perched groundwater is encountered during grading, or to allow discharges associated with testing of water lines, sprinkler systems and other facilities. In general, the General Construction Permit authorizes construction dewatering activities and other construction related non-stormwater discharges as long as they (a) comply with Section A.9 of the General Permit; (b) do not cause or contribute to violation of any water quality standards, (c) do not violate any other provisions of the General Permit, (d) do not require a non-stormwater permit as issued by some RWQCBs, and (e) are not prohibited by a Basin Plan provision. Full compliance with applicable local, state and federal water quality standards by the Applicant would assure that potential impacts from dewatering discharges are less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Pesticides.</b> There are no known pesticide contaminated soils onsite. Nonetheless, disturbance and/or transport of potential pesticides adsorbed to existing site sediments may be a concern during the construction phase. The Construction SWPPP would contain sediment and erosion control BMPs pursuant to the General Construction Permit, and those BMPs</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>would effectively control erosion and the discharge of sediment along with other pollutants per the BAT/BCT standards.</p>		
<p><b>Hydrocarbons.</b> During the construction phase of the Proposed Project, hydrocarbons in site runoff could result from construction equipment/vehicle fueling or spills. However, pursuant to the General Construction Permit, the Construction SWPPP must include BMPs that address proper handling of petroleum products on the construction site, and those BMPs must effectively prevent the release of hydrocarbons to runoff per the BAT/BCT standards. Polycyclic Aromatic Hydrocarbon (PAH) that is adsorbed to sediment during the construction phase would be effectively controlled via the erosion and sediment control BMPs.</p>		<p>Less Than Significant Impact.</p>
<p><b>Trash and Debris.</b> During the construction phase of the Proposed Project, there is potential for an increase in trash and debris loads at the Project Site. The SWPPP for the site will include BMPs for trash control. Compliance with the Permit Requirements and inclusion of these BMPs, meeting BAT/BCT, in the SWPPP will mitigate impacts from trash and debris to a level less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Turbidity.</b> The Construction SWPPP must contain sediment and erosion control BMPs that effectively control erosion and discharge of sediment, along with other pollutants. Additionally, fertilizer control, non-visible pollutant monitoring and trash control BMPs will help control turbidity during construction. If the proposed PDFs and construction-related controls are implemented, runoff discharges from the Proposed Project would not cause increases in turbidity and the water quality impacts related to turbidity during construction are considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Operational Impacts.</b></p>		
<p><b>Modeled Pollutants of Concern – Total Suspended Solids (TSS).</b> The predicted TSS concentration is well below the average values observed in Dominguez Channel. Based on the comprehensive site design, source control, and treatment control strategy, and the comparison with available in-stream data and Basin Plan benchmark objectives, the TSS in stormwater runoff from the Proposed Project will not cause a nuisance or</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
adversely affect beneficial uses in the receiving waters. Potential impacts associated with TSS are considered less than significant.		
<p><b>Modeled Pollutants of Concern – Total Phosphorous (TP).</b> TP load is predicted to increase slightly and TP concentration is predicted to decrease slightly post-construction as compared to existing conditions. Based on the comprehensive site design, source control, and treatment control strategy and the comparison with available in-stream monitoring data and Basin Plan benchmark objectives, potential impacts associated with TP are considered less than significant.</p>		Less Than Significant Impact.
<p><b>Modeled Pollutants of Concern – Nitrogen Compounds.</b> The average annual stormwater concentration of ammonia is predicted to be considerably less than the Basin Plan objective, and within the low end of the range of observed concentrations in Dominguez Channel. Likewise, the average annual stormwater concentration of nitrate-N plus nitrite-N is predicted to be considerably less than the Basin Plan WQO and below the range of observed concentrations for Dominguez Channel. Thus, the Proposed Project’s impacts associated with nitrogen compounds are considered less than significant.</p>		Less Than Significant Impact.
<p><b>Modeled Pollutants of Concern – Metals.</b> Copper, lead, and zinc are the most prevalent metals typically found in urban runoff. Although runoff volumes will increase with the Proposed Project, the change in land use with the planned level of treatment are predicted to decrease the runoff concentrations for all three trace metals. The Proposed Project would include site design, source control, and treatment control BMPs in compliance with the SUSMP requirements. Based on the comprehensive site design, source control, and treatment strategy and the comparison with the in stream water quality monitoring data and benchmark California Toxic Rule values, the Proposed Project’s potential impacts associated with trace metals are considered less than significant.</p>		Less Than Significant Impact.
<p><b>Non-Modeled Pollutants of Concern – Turbidity.</b> Discharges of turbid runoff are primarily of concern during the construction phase of development. Based upon the implementation of the PDFs and construction-related controls, runoff discharges from the Proposed Project</p>		Less Than Significant Impact.



Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>would not cause increases in turbidity that could result in adverse affects to beneficial uses in the receiving waters and the water quality impacts related to turbidity are considered less than significant.</p>		
<p><b>Non-Modeled Pollutants of Concern – Pesticides.</b> Pesticides would be applied to common landscaped areas and residential lawns and gardens during operation of the Proposed Project. Based on the incorporation of site design, source control, and treatment control BMPs pursuant to SUSMP requirements and the use of an Integrated Pest Management program, potential operational Project impacts associated with pesticides are considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Non-Modeled Pollutants of Concern – Pathogens.</b> The primary sources of fecal coliform from the Proposed Project would likely be sediment, pet wastes, wildlife, and regrowth in the storm drain itself. With the incorporation of proposed PDFs, the Proposed Project would not result in appreciable changes in pathogen levels in the receiving waters compared to existing conditions, and potential water quality impacts related to pathogens are considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Non-Modeled Pollutants of Concern – Hydrocarbons.</b> Although the concentration of hydrocarbons in runoff is expected to increase slightly with the Proposed Project due to the increase in roadways, driveways, parking areas, and vehicle use, the proposed PDFs are expected to prevent appreciable increases in hydrocarbon concentrations from leaving the Project Site. The effect of the Proposed Project on petroleum hydrocarbon levels in the receiving waters is considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Non-Modeled Pollutants of Concern – Trash and debris.</b> Urbanization can significantly increase trash and debris loads, which can impose an oxygen demand on a water body as organic matter decomposes. The proposed PDFs include both source control and treatment BMPs that will remove or prevent the release of floating materials, including solids, liquids, foam, or scum, from runoff discharges and will prevent impacts on dissolved oxygen in the receiving water due to decomposing debris. Therefore, water quality impacts related to trash and debris are considered</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
less than significant.		
<p><b>Non-Modeled Pollutants of Concern – Methylene Blue Activated Substances (MBAS).</b> MBAS, which is related to the presence of detergents in runoff, may be incidentally associated with urban development due to commercial and/or residential vehicle washing or other outdoor washing activities. The presence of soap in runoff from the Proposed Project will be controlled through the source control PDFs, including a public education program on residential and charity car washing, and the provision of a car wash pad connected to sanitary sewer in the multi-family residential areas. Therefore, potential water quality impacts related to MBAS are considered less than significant.</p>		Less Than Significant Impact.
<p><b>Bioaccumulation.</b> The potential for bioaccumulation impacts from the lake and proposed vegetated BMPs will be minimal because the Project Site is largely impervious with very little coarse solids and associated pollutants expected to be generated. The potential for bioaccumulation and adverse effects on waterfowl and other species is considered less than significant.</p>		Less Than Significant Impact.
<p><b>Dry Weather Runoff.</b> Pollutants in dry weather flows could also be of concern because dry weather flow conditions occur throughout a large majority of the year. The Proposed Project will be a new development with new storm drains and sanitary sewer systems, which are expected to have minimal, if any, leakage. Based on source control PDFs reducing the amount of dry weather runoff and treatment control PDFs capturing and treating the dry weather runoff that may occur, the potential impact from dry weather flows is considered less than significant.</p>		Less Than Significant Impact.
<p><b>Direct Groundwater Quality Impacts.</b> Discharge from the Project’s developed areas to groundwater will occur through general infiltration of irrigation water and through incidental infiltration of urban runoff in the proposed treatment control PDFs after treatment. Since the historical shallow ground water level at the site is deeper than 50 feet, impacts to groundwater caused by infiltration of irrigation water and treated urban runoff is considered less than significant.</p>		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p><b>Water Quality Impacts and Safety Concerns from the Hollywood Park Lake.</b></p>		
<p><i>Mosquitoes in Manmade Lakes and Water Features.</i> The Hollywood Park lake will be constructed with several design features specifically designed to limit the available habitat for mosquito breeding. The lake will provide very little suitable habitat for mosquito larvae and will support healthy populations of mosquito predators, and very few mosquitoes will successfully breed in the lake.</p>		<p>Less Than Significant Impact.</p>
<p><i>Other Vectors and Nuisance Animals.</i> Several other types of potential disease vectors are often associated with lakes (such as rats, muskrats, other insects, midges and crane flies), although this association is not typically rooted in fact. Although some of these vectors can live near lakes, they can also live throughout landscaped residential areas, and the lake should not be considered an attractor for such vectors. Therefore, these vectors will cause a less than significant impact.</p>		<p>Less Than Significant Impact.</p>
<p><i>Shoreline Safety.</i> The safety of the public is a primary concern of lake designers, and the lake at Hollywood Park will be designed to provide a safe shoreline environment. The overall effect of the safety edge of the shoreline is to provide a situation in which nobody can accidentally find themselves in deep water.</p>		<p>Less Than Significant Impact.</p>
<p><i>Fecal Coliform Bacteria.</i> A lake has many potential sources of fecal coliform bacteria, including storm drains, runoff directly into the lake, and wildlife that will be attracted to the lake. However, the lake will serve as an excellent BMP for removing fecal coliform and other bacteria from stormwater, and the lake will not serve as a significant source of indicator bacteria or pathogens to the receiving water. Thus the lake will significantly reduce the discharge of bacteria and pathogens from the site as compared to typical urban developments.</p>		<p>Less Than Significant Impact.</p>
<p><i>Pathogenic Organisms.</i> Pathogenic organisms will be present in very low concentrations in the lake at Hollywood Park as indicated by the low levels of fecal coliform bacteria present in lakes of similar construction. Because pathogens will be present in such low concentrations, this impact</p>	<p>Less Than Significant Impact.</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
is considered less than significant.		
<b>Inadvertent Body Contact.</b> The lake at Hollywood Park will not be designed for swimming, boating, or other contact recreation, but inadvertent human contact with the water may still occur. The lake at Hollywood Park will, most of the time, meet higher standards than are required. Therefore the lake should be considered quite safe for any inadvertent or accidental contact that may occur.		Less Than Significant Impact.
<b>Offensive Odors.</b> Offensive or unpleasant odors will not be present at the lake because it will have excellent water quality at all times and will be well aerated. Therefore impacts will be less than significant.		Less Than Significant Impact.
<b>Groundwater Contamination.</b> The lake will be constructed with a synthetic membrane liner that will be continuous beneath the entire lake and will prevent any mixing of lake water with groundwater. As such, impacts will be less than significant.		Less Than Significant Impact.
<b>Water Quality Treatment.</b> The lake at Hollywood Park will serve as a treatment facility for stormwater on the Project Site. The lake will be designed with several types of water quality systems to ensure that stormwater entering the lake is treated to a very high level before discharge, and that water residing in the lake is continuously treated to maintain excellent water quality in the lake.		Less Than Significant Impact.
<b>Land Use Equivalency Program.</b> Potential changes in land use under the program would have not substantial effect on the predicted loads and concentrations, BMPs, or groundwater use and their associated impacts, because only the use is changing. All mitigation measures to minimize water quality impacts under the Proposed Project would be implemented, and hydrology and water quality impacts would remain less than significant, as with the Proposed Project.		Less Than Significant Impact.
<b>IV.G NOISE</b>		
<b>Construction –Related Noise Impacts</b>		
<b>Construction Noise.</b> Construction of the proposed project would result in temporary increases in ambient noise levels in the project area on an	MM G-1. All construction equipment shall be equipped with mufflers	Significant and Unavoidable Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>intermittent basis. Construction-related noise levels at sensitive receptors nearest to the Project Site would exceed the five dBA significance threshold. However, even with implementation of mitigation measures, construction activity would exceed the 5 dBA threshold and result in a significant impact. The City has not adopted specific construction noise level standards or limitations. Instead, the City regulates construction noise by limiting activity to the hours identified in the Noise Ordinance. Construction activity associated with the project would comply with the standards established in the Noise Ordinance.</p>	<p>and other suitable noise attenuation devices.</p> <p>MM G-2. As feasible, grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).</p> <p>MM G-3. As feasible, equipment staging areas shall be located away from sensitive receptors.</p>	
<p><b>Construction Vibration.</b> The Project would involve the use of heavy equipment capable of generating vibration levels of 0.089 PPV at a distance of 25 feet. Vibration levels at nearby sensitive receptors would not exceed the potential building damage threshold of 0.5 PPV. As such, the Proposed Project would result in a less-than-significant vibration impact.</p>	<p>MM G-4. A perimeter wall is already present between the project site and the residential development to the east (Renaissance). The Project Applicant shall not remove this wall.</p> <p>MM G-5. All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet, shall also be posted at high visibility areas on the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as a telephone number where residents can inquire about the construction process and register complaints.</p> <p>MM G-6. A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and use reasonable measures to mitigate the problem, if feasible. All notices that are sent to residential</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.	
<b>Operational Noise Impacts</b>		
<p><b>Mobile Noise - Weekday.</b> The predominant noise source for the proposed project is vehicular traffic. The Proposed Project would result in a slight reduction in noise levels along all but one analyzed segment on weekdays; Arbor Vitae Street between La Brea Avenue and Prairie Avenue would not change future noise levels. This reduction can be attributed to the removal of the existing racetrack, which currently attracts a daily average of 10,000 patrons. Accordingly, the proposed project would result in a beneficial impact on the ambient noise environment as it would slightly reduce noise levels in the project area.</p>	<p>MM G-7. All residential units shall be designed to minimize noise effects from non-residential activities on the project site, including the casino, parking areas, loading zones, alarms from trucks in reverse and commercial uses with exterior components (e.g., outdoor dining, special entertainment events, etc.). These design measures shall be established to maintain noise levels at interior spaces to be within the 45 dBA noise standards. Measures shall include, but not be limited to, using construction techniques/materials with an STC rating of 40 in habitable rooms/areas, the use of perimeter walls, sound-rated interior walls between uses, or other site planning and building placement that could reduce or eliminate the light-of-sight between the noise source and residential units.</p> <p>See Mitigation Measure I-1 in Section IV. I. Land Use for an additional mitigation measure related to airport noise impacts.</p>	Less Than Significant Impact.
<p><b>Mobile Noise - Weekend.</b> The Proposed Project would result in a slight increase (i.e., an increase of 0.8 dBA or less) in noise levels along six of the ten analyzed roadway segments on weekends, a slight reduction in noise levels along two of the analyzed segments and no change along the remaining two segments. Mobile noise levels attributed to the proposed project would not increase by three decibels (CNEL) to or within the “normally unacceptable” or “clearly unacceptable” category or result in a five-decibel or more increase in noise level. As such, the proposed project would result in a less-than-significant impact on the ambient noise environment.</p>		Less Than Significant Impact.
<p><b>Mechanical Equipment Noise.</b> Potential stationary noise sources related to the long-term operations of the proposed project include mechanical equipment and parking areas. Mechanical equipment could generate noise levels that are audible at both on- and off-site noise sensitive locations. However, equipment would generally be located within</p>		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>enclosures or behind new buildings or otherwise shielded from the nearby sensitive land uses. In addition to this physical shielding, proper engineering during the detailed design phases would ensure that the noise generated by mechanical equipment operations will meet Inglewood Municipal Code noise standards. As such, mechanical equipment would result a less-than-significant noise impact.</p>		
<p><b>Parking Noise.</b> Proposed Project parking activity along Prairie Avenue and Century Boulevard would potentially expose off-site sensitive receptors to unacceptable levels of parking noise. As compared to the ambient noise level along these roadways, however, the ambient noise level increase at sensitive receptors along Prairie Avenue and Century Boulevard would be less than one dBA and would not be audible. In addition, the majority of project parking would be located internal to the project site and away from sensitive receptors. As such, parking noise would result in a less-than-significant impact.</p>		Less Than Significant Impact.
<p><b>Truck Noise.</b> The noise produced by delivery and trash pick-up trucks at the Project Site will be a potential source of annoyance. The noise level associated with a trash or delivery truck would generally average approximately 88 dBA. These sources of noise are typical in an urban environment and would be considered less-than-significant.</p>		Less Than Significant Impact.
<p><b>On-Site Noise Exposure.</b> New sensitive receptors located on the southern portion of the Project Site would potentially be exposed to high noise levels from project-related commercial activity and recreational activity from the casino. Specifically, proposed residential units that abut the proposed retail uses along Century Boulevard would potentially experience increased noise from various retail noise sources. Portions of the project site are within the 65 dBA CNEL noise contour for LAX. The portions of the project site located within the 65 dBA CNEL noise contour would potentially include residential and mixed-use land uses. As such, new sensitive land uses may potentially be exposed to interior noise levels that exceed the recommended 45 dBA CNEL. Therefore, mitigation is proposed to reduce potentially significant aircraft noise.</p>		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p><b>Vibration.</b> The proposed project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. Operational vibration would result in a less-than-significant impact.</p>		<p>Less Than Significant Impact.</p>
<p><b>Land Use Equivalency Program.</b> The construction impacts of the Equivalency Program construction noise levels would be the same as forecasted for the Proposed Project. Therefore, significant and unavoidable impacts with regard to the construction phase will occur. Operational impacts would be similar to the operational impacts of the Proposed Project. All recommended mitigation measures to minimized noise impacts will be implemented, and impacts with respect to operations will remain less than significant.</p>		<p>Significant Unavoidable Impact with respect to Construction.</p> <p>Less Than Significant Impact with respect to Operation.</p>
<p><b>IV.H POPULATION, HOUSING, AND EMPLOYMENT</b></p>		
<p><b>Construction Impacts.</b> The Proposed Project would generate over 17,105 construction-related jobs over the 10-year buildout and stabilization horizon of the Proposed Project, including approximately 9,203 direct jobs, 3,274 indirect jobs, and 4,628 induced jobs. Employment opportunities associated with construction of the Proposed Project would not 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.</p>	<p>No mitigation measures are required. 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.</p>	<p>Less Than Significant Impact.</p>
<p><b>Operational Employment Displacement Impacts.</b> The Proposed Project would eliminate horse racing at the Hollywood Park Racetrack. In the broader context of the horse racing industry in California, horseracing is a declining business industry largely due to increased competition for the publics' recreation and entertainment dollars. 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. In analyzing displacement impacts, Seasonal/Part Time employees and Casual Laborers at the racetrack have been included as potentially lost jobs when the existing facility closes. However, in reality many of these</p>		<p>Less Than Significant Impact.</p>



Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>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. Additionally, the Proposed Project creates 517 net new jobs. Overall, displacement impacts are less than significant.</p>		
<p><b>Indirect Employment Growth.</b> 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. Rather, by introducing housing in a jobs-rich area, the Project is expected to bring balance. Indirect impacts to population and housing demographics generated by the commercial uses of the Project would be less than significant.</p>		Less Than Significant Impact.
<p><b>Direct Employment Growth.</b> The proposed commercial office, retail/entertainment, casino/gaming, hotel and residential land uses are estimated to generate approximately 3,135 jobs, including the retention of approximately 1,017 existing Casino-related jobs. When compared to the displacement of the 2,185 existing jobs (1,601 full-time equivalent jobs) associated with the current horseracing operations on the property, the Proposed Project would result in a net increase of 517 jobs. 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.</p>		Less Than Significant Impact.
<p><b>Housing Growth Impacts.</b> The Proposed Project will create approximately 2,995 new residential dwelling units, resulting in approximately 8,985 new permanent residents. The Proposed Project’s housing and population growth is technically inconsistent with the RTP growth forecasts for the city. However, Inglewood is a jobs-rich area, and new housing would bring balance to the area. Despite this technical</p>		Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>inconsistency, 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. Additionally, 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. Nonetheless, impacts upon population and housing growth would be considered a significant impact due to the technical inconsistency with growth forecasts.</p>		
<p><b>Population Growth Impacts.</b> Based on SCAG’s 2008 population projections, the City of Inglewood is anticipated to experience a population increase of 2,396 persons between the years of 2005 and 2015. The Proposed Project would add approximately 8,985 persons by 2014. Therefore, the population growth generated by the Proposed Project would not be consistent with the regional growth projections. However, 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. Still, 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.</p>		<p>Significant Impact.</p>
<p><b>Land Use Equivalency Program.</b> 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 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, 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, since the number of dwelling units could vary</p>		<p>Less Than Significant Impact with respect to employment generation.</p> <p>Significant Impact with respect to population and housing growth forecasts.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
between 2,995 and 3,500 with a corresponding adjustment to commercial, office, or hotel use.		
<b>IV.I LAND USE &amp; PLANNING</b>		
<p><b>Land Use Compatibility.</b> The residential, retail, and commercial office, hotel, civic, open space and casino/gaming uses that are proposed within the Hollywood Park Redevelopment Project are substantially consistent with the surrounding land uses. The Proposed Project, however, through the adoption of a Specific Plan and a change in the zoning standards, will provide a comprehensive land use plan to establish specific land use zones and development standards to provide a vibrant mixed-use environment. The planned uses would be more compatible than the existing recreational use that currently occupies the Project Site, as the scale and massing of the structures within the planned development would be consistent with the low to mid-rise commercial and residential structures that exist in the immediate area. Land use compatibility impacts would therefore be less than significant.</p>	<p>MM I-1. Proposed residential uses, including those that fall within the Airport Influence Area's 65 dBA CNEL contour, shall be developed in a manner that achieves a 45 dBA interior noise level. A qualified noise consultant shall complete an exterior to interior noise analysis during the ministerial building permit stage in conformance with the California Building Code, Title 24, Section 1207 to ensure that interior noise levels are at or below 45 dBA CNEL.</p>	<p>Less Than Significant Impact.</p>
<p><b>Consistency with Regional Land Use Policies and Regulations.</b> The Proposed Project would be consistent with the applicable policies and goals of SCAG's Regional Comprehensive Plan and Guide; SCAG's Growth Visioning Goals; the RWQCB's National Pollution Discharge Elimination System requirements; the Los Angeles County's Congestion Management Plan, and would be constructed in a manner that complies with the Airport Land Use Plan. Therefore, impacts related to consistency with applicable regional Plans would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>City of Inglewood General Plan.</b> The Project would not be consistent with the current General Plan land use designation. The Project would involve a request for a General Plan Amendment and adoption of a Specific Plan to bring the proposed project into conformance with the General Plan. With adoption of the proposed General Plan Amendment and Specific Plan, land use impacts would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>Specific Plan.</b> The Hollywood Park Redevelopment Project would</p>		<p>Less Than Significant</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>involve adoption of the Hollywood Park Specific Plan (the “Specific Plan”) to facilitate the planned development of a mixed-use master planned community. The Specific Plan creates a comprehensive set of regulations to allow for the creation of a mixed-use development of the scale of the Proposed Project. With adoption of the Specific Plan, land use impacts will be less than significant.</p>		Impact.
<p><b>Merged Redevelopment Project Area.</b> The Proposed Project would be generally consistent with the goals and intent of the Redevelopment Plan for the Merged Redevelopment Project Area as the Proposed Project would redevelop an existing property that is currently underutilized. Redevelopment of the Project Site would promote the Plan’s goal to revitalize existing development in a manner that is consistent with the environmental, social and economic goals of the City. However, the portions of the Project Site that fall within the Merged Redevelopment Project Area are designated for Commercial/Recreation and Commercial/Residential land uses, and are thus not consistent with the underlying land use designation(s). The Project would require an amendment to the Redevelopment Plan. With the approval of the proposed amendments, the project would be brought into conformance with the land use designations in the Redevelopment Plan and land use consistency impacts would be less than significant.</p>		Less Than Significant Impact.
<p><b>Inglewood Municipal Code/Zoning.</b> The proposed remodel and reconfiguration of the Casino would fall within the existing zoning overlay of the site that allows casino operations (i.e., the portion of the site that will remain zone C-R). The remainder of the Proposed Project would not be consistent with the current zoning designations of the Inglewood Municipal Code. As such, a Zone Change and the adoption of a Specific Plan would be required to bring the portions of the project that are outside the casino overlay zone in conformance with the Inglewood Municipal Code. With adoption of the proposed Zone Change, land use impacts would be less than significant.</p>		Less Than Significant Impact.
<p><b>Urban Decay / Blight.</b> With respect to the project’s potential to result in urban decay or blight, there is no foreseeable possibility that development of the Project would seize significant amounts of sales from existing or</p>		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>other planned retail developments, and therefore it will not lead to the chain reaction of events that could lead to “urban decay” (i.e., disinvestment, store closures, abandonment and resulting blight). Thus, impacts would be less than significant.</p>		
<p><b>Land Use Equivalency Program.</b> The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area. The exchange of office/commercial, retail, hotel and/or residential uses would be accomplished within the same building parameters. The exchange of the land uses would constitute a slight variation in the overall use mix of the Proposed Project. These variations would not substantially alter the overall mixed-use character of the Project. Therefore, the uses that could occur under the Equivalency Program, as is the case with the Proposed Project, would be compatible with the existing plans, as amended, and the planned densities. Impacts regarding consistency with local and regional land use plans and policies would be less than significant.</p> <p>The relationship to surrounding neighborhoods and communities would be the same under the Equivalency Program as with the Proposed Project, and would not divide the surrounding neighborhood, community or land use. As with the case of the Proposed Project, impacts regarding the relationship to the surrounding community under all Equivalency Scenarios would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p><b>IV.J PUBLIC UTILITIES</b></p>		
<p><b>Water.</b> The City currently has ground water pumping wells, and the UWMP has anticipated the need for additional wells. However, the need for additional infrastructure beyond what is currently anticipated would not be required to carry out the Proposed Project, and any need for new or expanded water facilities for the City would be required independent whether the Proposed Project is implemented. Therefore, the Proposed Project would not require or result in the construction of new water facilities or expansion of existing facilities, and impacts would be less than significant.</p> <p>With implementation of the mitigation measures, the water supply deficit</p>	<p>MM J.1-1. The Applicant shall lease or convey to the City its sufficient adjudicated pumping rights to cover the projected project related water supply deficit (i.e., 103 or 154 AF/yr).</p> <p>MM J.1-2. The Applicant shall ensure all toilets installed within the project will be high efficiency models.</p> <p>MM J.1-3. The Applicant shall ensure all urinals installed within the</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>generated by the Proposed Project, including the Equivalency Program, is addressed through a variety of potential sources of additional water including pumping, leasing, or purchasing of water supplies. Additionally, the Proposed Project would impose conservation measures similar to those that would be imposed during dry or multiple dry years. Therefore, sufficient water supplies would be available to serve the Proposed Project from existing entitlements and resources, and water supply impacts will be reduced to a less than significant level.</p>	<p>project will be high efficiency models.</p> <p>MM J.1-4. The Applicant shall ensure shower fixtures shall be limited to one showerhead per shower stall.</p> <p>MM J.1-5. The Applicant shall ensure any residential dishwashers provided on site will be high efficiency dishwashers (Energy Star rated).</p> <p>MM J.1-6. The Applicant shall ensure domestic water heating systems will be located in close proximity to point(s) of use, as feasible; and shall use tankless and on-demand water heaters, as feasible.</p> <p>MM J.1-7. The Applicant shall ensure the on-site irrigation system will include the following requirements:</p> <ul style="list-style-type: none"> <li>○ Weather-based irrigation controller with rain shutoff;</li> <li>○ Flow sensor and master valve shutoff (large landscapes);</li> <li>○ Matched precipitation (flow) rates for sprinkler heads;</li> <li>○ Drip/microspray/subsurface irrigation where appropriate;</li> <li>○ Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials; and</li> <li>○ Use of landscape contouring to minimize precipitation</li> </ul>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p style="text-align: center;">runoff.</p> <p>MM J.1-8. The Applicant shall ensure the Project will provide individual metering and billing for water use for all dwelling units.</p> <p>MM J.1-9. The Applicant shall ensure that the Project will utilize recycled water for appropriate end uses (irrigation).</p> <p>MM J.1-10. The Applicant shall comply with the Standard Urban Storm water Mitigation Plan (SUSMP) and shall encourage implementation of Best Management Practices that have stormwater recharge or reuse benefits.</p>	
<p><b>Sewer – Construction Impacts.</b> Construction of the Proposed Project would require connections to the local sewerage conveyance infrastructure that is located in the right-of-way easements adjacent to the Project Site. The installation of new sanitary sewers and the connection to existing sewer lines would require minimal trenching and pipeline installation on-site and at off-site locations in the public right-of-way. Such activities could result in temporary sidewalk or roadway lane closures for short periods of time but would not result in any adverse environmental impacts. Therefore, Project impacts with respect to the construction impacts to connect to the existing wastewater infrastructure would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant Impact.</p>
<p><b>Sewer – Operational Impacts.</b> The Proposed Project would generate approximately 393,000 gpd of wastewater, or 143 million gallons annually. Sewage generated by the Proposed Project would continue to be conveyed and treated at the JWPCP, which has adequate capacity to accommodate the increased wastewater flows and thus RWQCB treatment standards area assured of being maintained. Water conservation measures required by City ordinance would be implemented</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
as part of the Proposed Project and would help reduce the amount of wastewater generation. As such, Project impacts with respect to the wastewater treatment capacity would be less than significant.		
<b>Energy Conservation – Construction Impacts.</b> Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Construction equipment would use a combination of energy sources, including diesel fuel, gasoline, electricity and natural gas and would be accommodated by the existing utility providers. Impacts would therefore be less than significant.	No mitigation measures are required.	Less Than Significant Impact.
<b>Energy Conservation – Operational Impacts - Electricity.</b> Development of the Proposed Project would increase the existing demand for electricity service in the project area. The Proposed Project would continue to be served from the existing power grid. The estimated net increase in electricity consumption by the Proposed Project is approximately 6,836,844 kW-hr/per year. Southern California Edison has stated that it can provide electrical service to serve the Proposed Project. Therefore, impacts to energy conservation would be less than significant.	No mitigation measures are required.	Less Than Significant Impact.
<b>Energy Conservation – Operational Impacts - Natural Gas.</b> Existing gas facilities within the project area would be used to serve the project site. The site would tie into existing primary lines running along Prairie Avenue and W. 90 <sup>th</sup> Street. The Proposed Project’s net natural gas demands are estimated to be approximately 19.9 million cf per month. The Southern California Gas Company has stated that it can provide natural gas to service the Proposed Project. Impacts associated with natural gas resources would therefore be less than significant.	No mitigation measures are required.	Less Than Significant Impact.
<b>Solid Waste – Construction Impacts.</b> Construction of the Proposed Project will generate approximately 80,595 tons of construction and demolition debris that will need to be disposed of at area landfills and/or recycled. The proposed project would implement an on-site recycling program that would include crushing and recycling asphalt and concrete materials on-site to the maximum extent feasible. Area landfills currently		Less Than Significant Impact.



Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>have adequate capacity to serve the solid waste disposal needs of the project. Therefore construction related solid waste impacts would be less than significant.</p>		
<p><b>Solid Waste – Operational Impacts.</b> Operation of the Proposed Project would cause an on-going generation of solid waste throughout the lifespan of the Project. Upon full occupancy, the Proposed Project’s residential and commercial uses would generate approximately 12,461 net pounds (6.2 tons) of solid waste per day, or approximately 2,263 tons per year. Because the Proposed Project would generate additional solid waste throughout the life of the project and beyond the expected life of the landfills serving the Project Site, operational solid waste impacts would be considered significant and unavoidable.</p>	<p>Aside from the Project Design Features to minimize solid waste impacts, no additional feasible mitigation measures have been identified.</p>	<p>Significant Unavoidable Impact.</p>
<p><b>Land Use Equivalency Program.</b> Potential changes in land use under the Equivalency Program would have no substantial effect on public utilities because only the intensity of use of the land is slightly changing. Therefore, the impacts with regard to water, sewer, energy conservation, and solid waste – construction would remain less than significant, and solid waste – operational impacts would remain significant and unavoidable.</p>	<p>Aside from the Project Design Features to minimize solid waste impacts, no additional feasible mitigation measures have been identified.</p>	<p>Less Than Significant Impact.  Significant and Unavoidable Impacts with respect to solid waste operations.</p>
<p><b>IV.K PUBLIC SERVICES</b></p>		
<p><b>Police - Construction Impacts.</b> Construction sites can be sources of nuisances, providing hazards and inviting theft and vandalism. As such, the Proposed Project would employ mitigation measures including erecting temporary fencing around the construction site to discourage trespassers and deploying roving security guards to monitor the construction site and deter any potential criminal activity. These mitigation measures would diminish the need for police services during construction of the Proposed Project and reduce the potentially significant impact to less-than-significant. Access and circulation to the Project Site and on roadways surrounding the construction site could be adversely affected by construction activities such as delivery schedules, temporary road/lane closures for utility upgrades in the right-of-way. Construction activities are not anticipated to result in any temporary lane closures on</p>	<p>MM K.1-1. Prior to construction the Applicant shall prepare a Construction Security and Safety Management Plan that provides for the following safety features to be implemented and maintained throughout the construction period:</p> <ul style="list-style-type: none"> <li>(a) The Project Contractor(s) shall erect temporary fencing around the Project Site during construction activities to secure the Project Site and discourage trespassers.</li> <li>(b) The Project Contractor(s) shall employ security lighting to deter any potential criminal activity. Construction</li> </ul>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>streets adjacent to the Project Site, which would have the potential to reduce emergency response times in the surrounding area. A Construction Traffic Control/Management Plan would be developed to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. Implementation of this mitigation measure would serve to reduce any potential construction traffic impacts to a less-than-significant level.</p> <p>As part of the Proposed Project, a police substation operated by the IPD and an on-site security plan would be conceived and implemented by the Applicant in consultation with the IPD to minimize the potential for on-site crime and reduce demands upon additional IPD services. Impacts upon Police Services would thus be less than significant.</p>	<p>materials should not be accessible to the public during non-construction hours.</p> <p>(c) Detour or other signs should be clearly marked, positioned and secured.</p> <p>(d) All open hazardous areas, such as trenches, must be secured.</p> <p>(e) All discarded debris should be secured during construction.</p> <p>(f) A private security service shall patrol the site during non-construction hours.</p> <p>MM K.1-2. Prior to construction, the Applicant shall prepare a Construction Traffic Control/Management Plan to minimize the effects of construction on vehicular and pedestrian circulation in the area of the Project Site.</p>	<p>Less Than Significant Impact.</p>
<p><b>Police - Operational Impacts.</b> The Proposed Project would introduce a net increase of approximately 8,985 new residents to the Project Site. Based on the current officer-to-inhabitant ratio that the IPD maintains (i.e., 1.6 officers per 1,000 inhabitants), the Proposed Project would generate a need for 14 new police officers. As compared to the number of sworn officers that are currently authorized for the IPD (i.e., 1.8 officers per 1,000 inhabitants), the project would generate a demand for 16 new police officers. The number of calls requesting police responses to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase somewhat with the increase in onsite activity and traffic in the surrounding area. It is anticipated that the demand for the additional</p>	<p>MM K.1-3. The Project Applicant shall file all building plans with the Inglewood Police Department. Plans shall include access routes, floor plans, and any other additional information that might facilitate prompt and efficient police response.</p> <p>MM K.1-4. The Project Applicant shall install alarms and or/locked doors on doorways providing public access to commercial facilities.</p> <p>MM K.1-5. The Project Applicant shall develop and implement a Security Plan in consultation with the IPD, outlining the</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>staffing of 14 to 16 new police officers would be met through the increase in property tax and retail sales tax revenue that would be generated by the Proposed Project.</p> <p><b>Police – Land Use Equivalency Program Impacts.</b> All of the recommended project design features and mitigation measures to minimize potential impacts on police protection services would be applicable to the Equivalency Program. Development under the Equivalency Program would include the same site accessibility and safety features as the Proposed Project. The Maximum Housing 1, 2 and 3 scenarios would slightly increase the demand for police services by requiring up to an additional 3 police officers. The Equivalency Program would generate additional revenues to the City which could be applied towards the provision of staffing requirements.</p>	<p>security services and features to be provided in conjunction with the Proposed Project. The plan shall be coordinated with the IPD and a copy of said plan shall be filed with the IPD. Said security plan may include some or all of the following components:</p> <p>(a) Surveillance:</p> <p>(b) Landscaping:</p> <ul style="list-style-type: none"> <li>• Low growing plants (thorny) under windows of commercial buildings excluding retail windows/storefronts.</li> <li>• Limit shrubbery to a maximum height of 2-3 feet near windows and entrances.</li> <li>• Trees should be thinned on top and width to allow natural and security lighting through them, discourage concealment, maximize public / police visibility.</li> <li>• Trees should not be adjacent to roofs or wall areas that can act as a natural ladder for burglars.</li> <li>• Placements of substantial low barriers, such as evergreen hedges can be used to create more formidable obstacles to potentially vulnerable areas and be part of Territoriality reinforcement and natural Access Control.</li> </ul>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<ul style="list-style-type: none"> <li>• Use open landscaping and see-through fencing instead (when applicable) of solid walls for boundaries where privacy or environmental noise mitigation is not needed.</li> </ul> <p>(c) Lighting:</p> <ul style="list-style-type: none"> <li>• In addition to appropriate Project Site lighting, include appropriate lighting on parking areas, sidewalks / streets, pedestrian paths.</li> <li>• Light should be consistent to reduce contrast between shadows and to illuminate areas to discourage concealment.</li> <li>• Lighting should not be blocked by trees or other landscaping.</li> <li>• All lighting fixtures should include appropriate vandal-proof protective grating covering.</li> <li>• Consider metal H.I.D. (High Intensity Discharge), metal halide wall packs and landscape down lights for energy costs, whiter lighting and safety features.</li> </ul> <p>(d) Physical Security:</p> <ul style="list-style-type: none"> <li>• Commercial windows and doors should not be obstructed by signs, displays, plants, etc., (other than signs typically associated with retail uses) in order to</li> </ul>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>provide maximum visibility for police and public observations.</p> <ul style="list-style-type: none"> <li>• Use open or see-through structures for exterior stairways, walkways, sitting areas, parking spaces, etc.</li> <li>• Eliminate potential hiding or entrapment spots.</li> <li>• Locate ATM's, pay phones and bike racks in well-lighted and visible areas to the public.</li> <li>• Where appropriate, install emergency phones, alarms or intercoms in convenient locations for public assistance.</li> <li>• Do not place heavy objects (trash and cigarette containers) near exterior glass ingresses as they can be used against the glass to gain entry.</li> <li>• Locate ATM's in front of banks or well-lit and visible public areas.</li> </ul> <p>(e) Access Control:</p> <ul style="list-style-type: none"> <li>• Control or eliminate public access to warehouse, storage and service areas.</li> <li>• Control and monitor employee keys, entry cards or access codes.</li> </ul>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<ul style="list-style-type: none"> <li>• Make signs legible and unambiguous. Use symbol signs where possible, to discourage access to dangerous areas, exits, emergency assistance, etc.</li> <li>• Design addresses for emergency visibility and access locations. Businesses may consider roof addresses for emergency aerial personnel.</li> <li>• Design public amenities to discourage misuse, such as shape benches to be comfortable for sitting, but not for sleeping. Roughen or install breaks in low walls, curbs and smooth surfaces to discourage skateboarding.</li> <li>• Design curb blocks to each commercial parking lot space to discourage vehicle racing and gathering of unauthorized vehicles during closing hours.</li> <li>• Install steel grating to any roof opening to deny criminal entry.</li> <li>• Storage or trash areas should be secured at all times to reduce the potential for encampments, vandalism and subjects or employees to hide stolen items from the stores.</li> <li>• Alarms, CCTV's, intrusion detectors and security guards can be based on the future identifications of commercial buildings.</li> </ul>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<ul style="list-style-type: none"> <li>• The use of planters can help control access to a semi-private outdoor dining area from a public area, such as a parking lot.</li> </ul> <p>(f) Territoriality:</p> <ul style="list-style-type: none"> <li>• Define clear boundaries to storage areas, private / public areas through signs, gates, landscaping and pavement treatment, such as tiles and cobblestones.</li> <li>• Residential and commercial buildings should be marked and clearly visible on all sides and roofs with appropriate building identification and address numbers.</li> <li>• Loading areas should not create dead end alleys or blind spots.</li> </ul> <p>(g) Target Hardening and Maintenance:</p> <ul style="list-style-type: none"> <li>• Exterior door hardware should be a minimum of 40 inches from adjacent windows.</li> <li>• Consider Astride covers for locks.</li> <li>• Consider security film for windows to deter vandalism and graffiti.</li> <li>• Avoid of loose rocks in landscaping.</li> </ul> <p>MM K.1-6. The Project Applicant shall implement an on-site security</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>plan in consultation with the Inglewood Police Department to provide a safe and secure environment within the proposed parks. The parks shall be designed and constructed in a manner that eliminates dead spaces and concealed areas to the maximum extent feasible. Low-level directional security lighting shall be provided to increase visibility for security personnel and passers by.</p>	
<p><b>Fire Protection – Construction Impacts.</b> Removal of the existing onsite buildings and construction of the Proposed Project could increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment, the use of flammable construction materials, and the careless disposal of cigarettes. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations.</p> <p>Project construction would not be expected to impact fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LACoFD. Therefore, construction-related impacts to fire protection services would be less than significant.</p>	<p>MM K.2-1 Throughout the demolition and construction process, Fire Department access shall remain clear and unobstructed at all times.</p> <p>MM K.2-2 All Project Contractors shall implement good housekeeping procedures during demolition and construction of the Proposed Project, including maintaining mechanical equipment in good operating condition; proper storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.</p>	<p>Less Than Significant Impact.</p>
<p><b>Fire Protection – Operational Impacts.</b> Implementation of the Project would increase the need for fire protection and emergency medical services. Emergency vehicle access to the Proposed Project Site would continue to be provided from local public roadways. The adequacy of fire protection for a given area is based on required fire flow, response time from existing fire stations and the LACoFD’s judgment for assessing the needs in a given area. The Project Site is adequately served by the existing water infrastructure and would be designed and developed to ensure adequate fire flow is maintained through buildout of the Proposed Project. Additional hydrants would be installed throughout the</p>	<p>MM K.2-3 The Proposed Project shall comply with all applicable code and ordinance requirements for construction, access, water mains, fire flow and hydrants. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check at Plot Plan Review.</p> <p>MM K.2-4 Final fire flows shall be determined by the Los Angeles County Fire Department. Fire flow of up to 5,000 gallons</p>	<p>Less Than Significant Impact.</p>



Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>development per Fire Code requirements based upon the specific land uses to be introduced (i.e., multi-family residential, commercial, and parking uses). As such, impacts related to fire flow are anticipated to be less than significant.</p>	<p>per minute (gpm) at 20 pounds per square inch residual pressure for a five-hour duration may be required or as determined based on building size, building relationships, proximity to property lines and types of construction.</p>	
<p><b>Fire Protection – Land Use Equivalency Program Impacts.</b> Under the Equivalency Program, there would be no substantial variation in the Project’s Circulation Plan. There would be no changes in building locations or site accessibility features. Development would be served by the same infrastructure and facilities as the Proposed Project. Construction-related, distance and emergency access and fire flow impacts would remain roughly the same as with the Proposed Project. These impacts would remain less than significant.</p> <p>In three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in population and the Maximum Office/Commercial scenario where there is a net increase in employment, the application of the Equivalency Program may generate higher demand for fire projection services than the Proposed Project.</p> <p>All of the recommended project design features and mitigation measures to minimize impacts on fire protection would be applicable to the Equivalency Program, as well as the Proposed Project. Like the Proposed Project, none of the Equivalency Scenarios would require the expansion, consolidation or relocation of an existing facility to maintain service. As such, impacts to fire protection services under the Equivalency Program would be less than significant.</p>	<p>MM K.2-5 Fire hydrant spacing shall be 300 feet and shall meet the following requirements:</p> <ol style="list-style-type: none"> <li>1. No portion of the lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.</li> <li>2. No portion of the building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.</li> </ol> <p>MM K.2-6 Internal driveways and roadways shall be no less than 26 feet and shall contain an approved turning radii of no less than 32 feet, or as approved by the Los Angeles County Fire Department.</p>	<p>Less Than Significant Impact.</p>
<p><b>Schools – Construction Impacts.</b> Construction activities have the potential to generate adverse impacts associated with respect to air quality, noise, traffic and public safety. The Proposed Project site is within approximately ¼ mile (1,300 feet) of eight institutional sensitive receptors. The Proposed Project’s construction-related activities would generate significant and unmitigatable regional and localized air quality impacts which would adversely impact all eight sensitive air quality</p>	<p>MM K 3-1. Prior to the start of project demolition, the Project Applicant shall prepare a Construction Management Plan approved by the Planning Department to ensure construction impacts to nearby school sites are minimized to the maximum extent feasible. The Construction</p>	<p>Less Than Significant Impact.</p> <p>Significant Unavoidable Impact with respect to</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>receptors. Construction related noise levels, even with mitigation, would exceed the five dBA significance threshold, and as such would result in a temporary significant construction noise impact at the sensitive receptors closest to the Project Site. Construction of the Proposed Project would also require the transport and use of heavy equipment, haul trucks, and generate other construction related traffic that could affect school pedestrian routes and or drop-off and pick-up routes. In addition to the above, construction sites have the potential to attract and endanger school aged kids if the site is not adequately secured and monitored to prevent trespassers. Implementation of precautionary mitigation measures would ensure that any potential impacts to student safety would be minimized to a less than significant level. Therefore, the Proposed Project (with exception of the significant and unavoidable air quality impacts from construction and operation, and the temporary construction noise impacts) would result in a less than significant impact upon public school sites.</p>	<p>Management Plan shall include the following:</p> <ul style="list-style-type: none"> <li>a. Project contractors shall maintain safe and convenient pedestrian routes to IUSD schools at all times. If necessary, the Project Contractor shall provide for crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.</li> <li>b. The Project Contractor shall maintain ongoing communication with school administration staff at affected schools, and shall provide sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.</li> <li>c. Staging or parking of construction-related vehicles, including worker-transport vehicles, shall not be allowed adjacent to school sites during school operating hours.</li> <li>d. The Project Contractor shall install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.</li> </ul>	<p>Noise and Air Quality.</p>
<p><b>Schools – Operational Impacts.</b> The Project Site has no existing residential uses and therefore does not currently generate any students. The Project would result in the generation of 574 students, including 279 elementary students, 137 middle school students, and 159 high school</p>	<p>MM K 3-2. Pursuant to Government Code Section 65995, the Applicant shall pay the developer fees at the time building permits are issued; payment of the adopted fees would</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>students. A four-acre site is proposed to be made available for civic uses, which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility. While this project feature could be set aside for the development of a new school site, the Developer would be responsible for the mandatory payment of school fees in conformance with SB 50, to mitigate the Project's impact on schools. In accordance with SB 50, payment of school fees is deemed to provide full and complete mitigation to impacts upon school capacity.</p>	<p>provide full and complete mitigation of school impacts. Alternatively, the Applicant may enter into a school finance agreement (Agreement) with the appropriate school district to address mitigation to school impacts in lieu of payment of developer fees. The Agreement shall be mutually satisfying and shall establish financing mechanisms for funding facilities to serve the students from the Project. If the Applicant and affected school district do not reach a mutually satisfying agreement, then project impacts would be subject to developer fees.</p>	
<p><b>Schools – Land Use Equivalency Program Impacts.</b> The exchange of land uses between retail/commercial/office/hotel to residential would alter the site uses and site population, which would result in an increase in public school students generated by the Equivalency Program. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the application of the Equivalency Program may generate higher demand for school services than compared to the Proposed Project. All of the recommended project design features and mitigation measures under the Proposed Project to minimize potential impacts on school services would be applicable to the Equivalency Program, and impacts would be reduced to a less than significant level.</p>		<p>Less Than Significant Impact.</p>
<p><b>Parks and Recreation.</b> Based on the City General Plan Open Space and Parks Element goal of providing 1 acre of parks and open space per 1,000 residents, the Proposed Project would generate a need for approximately 9 acres of public parkland in the project area (e.g., 8985 x 1/1,000). The Proposed Project would fulfill the park and recreational needs of its residents by providing 25 acres of open space on the Project Site, which equates to approximately 2.8 acres per 1,000 people. As the Proposed project would provide more than enough open space to meet the parks and recreation needs of the planned development, impacts upon the public parks and recreation system would be less than significant.</p>	<p>MM K 4-1. For those areas that are proposed for general public access, the park and open space areas shall be maintained by the home owners associations with public access during daylight hours only.</p>	<p>Less Than Significant Impact.</p>
<p><b>Parks and Recreation – Land Use Equivalency Program Impacts.</b> Development of the 3 maximum housing scenarios under the Equivalency Program is anticipated to result in an increase of 1,515 permanent residents as compared to the Proposed Project. Based on the City General</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Plan Open Space and Parks Element, the maximum housing scenarios under the Equivalency Program would generate a need for approximately 11 acres of public parkland in the Project Area. The Equivalency Program would fulfill the park and recreation needs of its residents by providing 25 acres of open space on the Project Site. Based on the Equivalency Program's permanent population estimates, this equates to approximately 2.4 acres per 1,000 people. As such, the Equivalency Program would provide more than enough open space to meet the parks and recreation needs of the planned development, and impacts upon the public parks and recreation system would be less than significant.</p>		
<p><b>Libraries.</b> Development of the Proposed Project would increase demands on library services in the area. Based on written correspondence from the IPL, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels. The IPL believes that their current facilities can provide the same level of service to the additional population in the proposed project area, except that the demand for public-use computers will increase. Through the potential allocation of the 4-acre civic site as a joint use school and library and contribution to the City's tax revenue, the Proposed Project's impact upon library services would be assessed as appropriate, commensurate with the demands placed on the public library system. The Proposed Project's impact upon library services would therefore be considered less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant Impact.</p>
<p><b>Libraries – Land Use Equivalency Program Impacts.</b> In three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the development of the Equivalency Program is anticipated to result in an increase of 1,515 permanent residents. Based on written correspondence from IPL, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels. With additional funds, IPL would provide more hours of service at the three locations, more books and other materials, and a greater number of public-use computers. Development of the Equivalency Program would result in additional tax revenue in the City that could be used to expand the existing library facilities. As with the case of the Proposed Project, the demand for</p>		

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>library services under the Equivalency Program could be met by existing service, therefore, the impacts to library services would be less than significant.</p>		
<p><b>IV.K.1 TRAFFIC/TRANSPORTATION</b></p>		
<p><b>Study Intersections</b></p> <p>The proposed project will result in significant traffic impacts at the following six of the 66 study intersections during the weekday AM peak hour, PM peak hour and/or Saturday mid-day peak hour:</p> <ul style="list-style-type: none"> <li>Int. No. 18: La Brea Ave./Centinela Ave. (City of Inglewood).</li> <li>Int. No. 19: La Brea Ave./Florence Ave. (City of Inglewood).</li> <li>Int. No. 22: La Brea Ave./Century Blvd. (City of Inglewood).</li> <li>Int. No. 25: Prairie Ave./Florence Ave. (City of Inglewood).</li> <li>Int. No. 45: Crenshaw Blvd./Manchester Blvd. (City of Inglewood)</li> <li>Int. No. 47: Crenshaw Blvd/Century Blvd (City of Inglewood)</li> </ul> <p><b>CMP Intersections</b></p> <p>One of the impacted intersections is also part of the CMP intersection monitoring program (Crenshaw Blvd/Manchester Blvd). The mitigation measure proposed for this intersection will reduce the project impacts at this intersection to less than significant levels based on CMP impact criteria.</p> <p><b>Transit Impacts</b></p> <p>The Proposed Project is forecast to generate demand for 79 new transit trips (29 inbound trips and 50 outbound trips) during the weekday AM peak hour. During the PM peak hour, the proposed project is forecast to generate demand for nominal new transit trips. Over a 24-hour period, the Proposed Project is forecast to generate a demand for 844 new daily transit trips. It is anticipated that the existing transit service in the project area will adequately accommodate the project generated transit trips and the public transit system will not be significantly impacted by the</p>	<p><b>Project Mitigation Measures</b></p> <p>MM L-1. <i>Intersection No. 18: La Brea Avenue/Centinela Avenue (City of Inglewood).</i> The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-2. <i>Intersection No. 19: La Brea Avenue/Florence Avenue (City of Inglewood).</i> The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-3. <i>Intersection No. 22: La Brea Avenue/Century Boulevard (City of Inglewood).</i> The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development.</p> <p>MM L-4. <i>Intersection No. 25: Prairie Avenue/Florence Avenue (City of Inglewood).</i> The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this</p>	<p><b>Study Intersections</b></p> <p>Less Than Significant Impact.</p> <p><b>CMP Intersections</b></p> <p>Less Than Significant Impact.</p> <p><b>Transit Impacts</b></p> <p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Proposed Project.</p> <p><b>Construction Impacts.</b> Activities related to final grading/structure construction period would generate a higher number of vehicle trips as compared to the grading and export period. Thus, the greatest potential for construction impact on the adjacent street system would occur during the final grading/structure construction period. The construction worker vehicles and miscellaneous trucks are forecast to generate 460 PCE (passenger car equivalency) vehicle trips per day (i.e., 230 inbound and 230 outbound) during peak final grading and structure construction phases at the site. During the weekday a.m. peak hour, the weekday p.m. peak hour, and the Saturday mid-day peak hour, it is estimated that approximately 31 PCE vehicle trips would be generated during each of these peak hours. Based on the peak construction project trip generation forecasts, traffic impacts due to construction activities are forecast to be less than significant based on the City’s significance criteria.</p>	<p>intersection. This improvement will be part of Phase II development.</p> <p>MM L-5. <b>Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-6. <b>Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p>	<p>Less Than Significant Impact.</p>
<p><b>Traffic and Transportation – Land Use Equivalency Program Impacts.</b> The Equivalency Program defines a specific framework within which certain land uses can be exchanged for other land uses without increasing potential traffic impacts. In order to implement the equivalency program, a set of equivalency factors have been prepared. The equivalency factor for each use is derived based on the project’s general mix of land uses as currently proposed and the weekday PM peak hour project trip generation. Utilization of the equivalency factors for the permitted uses will ensure that impacts remain less than significant.</p>	<p>In addition to the Project’s six impacted intersections, the Project Applicant will provide full funding for a traffic signal synchronization network at an additional 13 intersections, for a total of 19 ITS improved intersections. The additional 13 intersections are listed below, along with the phase in which it will be implemented.</p> <p>MM L-7. <b>Intersection No. 24: Centinela Avenue/Florence Avenue (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>MM L-8. <b>Intersection No. 14: I-405 Northbound Ramps/Century Boulevard (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development.</p> <p>MM L-9. <b>Intersection No. 16: Inglewood Avenue/Century Boulevard (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development.</p> <p>MM L-10. <b>Intersection No. 30: Prairie Avenue/Century Boulevard (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-11. <b>Intersection No. 38: Doty Avenue/Century Boulevard (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-12. <b>Intersection No. 39: Yukon Avenue/Century Boulevard (City of Inglewood)</b> The Project Applicant shall provide</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-13. <b>Intersection No. 40: Club Drive/Century Boulevard (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-14. <b>Intersection No. 51: Crenshaw Boulevard/Imperial Highway (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-15. <b>Non-Study Intersection: La Brea Avenue/Hyde Park Boulevard (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-16. <b>Non-Study Intersection: Market Street/Florence Avenue (City of Inglewood)</b> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this</p>	



Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>intersection. This improvement will be part of Phase II development.</p> <p>MM L-17. <i>Non-Study Intersection: Centinela Avenue/Hyde Park Boulevard (City of Inglewood)</i> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-18. <i>Non-Study Intersection: 11th Avenue/Century Boulevard (City of Inglewood)</i> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-19. <i>Non-Study Intersection: Van Ness Avenue/Century Boulevard (City of Inglewood)</i> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p>	
<p><b>Cumulative Impacts</b></p> <p>The Proposed Project and other development projects in the study area are forecast to contribute to cumulative traffic impacts at 27 of the 66 study intersections. Potential measures have been identified to mitigate the cumulative traffic impacts to less than significant levels. Therefore, it</p>	<p><b>Cumulative Impact Mitigation Measures</b></p> <p>MM L-20. <i>Intersection No. 1: Sepulveda Boulevard/Slauson Avenue (City of Culver City).</i> To the extent that Culver</p>	<p>Less Than Significant Impact at 27 of the 66 study intersections.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>is recommended that the project contribute its pro rata share of fees to implement the recommended cumulative traffic mitigation measures.</p>	<p>City (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Culver City determines to approve the implementation of the following improvements, the Project Applicant shall contribute 4.3% of the estimated total estimated cost of implementing the following roadway improvements: (1) Provide a northbound right-turn only lane within the northbound approach lane at this intersection, and (2) Modify the eastbound approach on Slauson Avenue at Sepulveda Boulevard to provide one additional through lane. The resultant northbound approach lane configuration would provide two left-turn lanes, three through lanes, and one right-turn only lane. The resultant eastbound approach lane configuration would provide one left-turn lane, three through lanes, and one right-turn only lane. It should be noted that there are three existing departure lanes on Slauson Avenue east of Sepulveda Boulevard.</p> <p>MM L-21. <i>Intersection No. 2: Sepulveda Boulevard/Centinela Avenue (City of Los Angeles).</i> To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements;, and (2) the legislative body of the City of Los Angeles determines to approve the implementation of the following improvements, the Project</p>	<p>Significant Unavoidable Impact at 3 of the 66 study intersections.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>Applicant shall contribute 0.1% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional northbound left-turn lane, (2) Modify the southbound approach on Sepulveda Boulevard at Centinela Avenue to provide one additional through lane, and (3) Contribute 0.1% of the total cost to install the Adaptive Traffic Control System (ATCS) at this intersection. The resultant northbound approach lane configuration would provide three left-turn lanes, three through lanes, and one right-turn only lane. The resultant southbound approach lane configuration would provide two left-turn lanes, four through lanes, and one right-turn only lane. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures so that the measures may ultimately be infeasible.</p> <p>MM L-22. <b>Intersection No. 3: La Cienega Boulevard (SB)/Slauson Avenue (County of Los Angeles).</b> The Project Applicant shall contribute 5.3% of the total estimated cost to develop and enhance the traffic signal operations at this location.</p> <p>MM L-23. <b>Intersection No. 5: La Tijera Boulevard/Centinela Avenue (City of Los Angeles).</b> The Project Applicant shall contribute 5.1% of the total estimated cost to develop and enhance the traffic signal operations at this location.</p> <p>MM L-24. <b>Intersection No. 7: La Cienega Boulevard/Centinela Avenue (City of Los Angeles).</b> To the extent that the City of Los Angeles (1) adopts a transportation improvement or</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute 0.4% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional left-turn lane on both the northbound and southbound La Cienega Boulevard approaches, and (2) Contribute 0.4% of the total cost to install the ATCS at this location. The resultant northbound and southbound approach lane configurations would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane.</p> <p>MM L-25. <b>Intersection No. 10: La Cienega Boulevard/Arbor Vitae Street (City of Inglewood).</b> The Project Applicant shall contribute 8.5% of the total estimated cost to develop and enhance the City of Inglewood ITS program at this intersection.</p> <p>MM L-26. <b>Intersection No. 12: La Cienega Boulevard/Century Boulevard (City of Los Angeles).</b> The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>mitigation is required.</p> <p>MM L-27. <b>Intersection No. 15: Inglewood Avenue/Arbor Vitae Street (City of Inglewood).</b> The Project Applicant shall contribute 18.8% of the total estimated cost to implement the following roadway improvements: (1) Restrict parking along the north side of Arbor Vitae Street during the weekday AM peak hour so as to allow the westbound approach curb lane to function as a shared through/right-turn lane through the intersection, and (2) Restrict parking along the south side of Arbor Vitae Street during the weekday PM peak hour so as to allow the eastbound approach curb lane to function as a shared through/right-turn lane through the intersection. The resultant westbound approach lane configuration during the weekday AM peak hour would provide one left-turn lane, one through lane, and one shared through/right-turn lane. The resultant eastbound approach lane configuration during the weekday PM peak hour would provide one left-turn lane, one through lane, and one shared through/right-turn lane.</p> <p>MM L-28. <b>Intersection No. 16: Inglewood Avenue/Century Boulevard (City of Inglewood).</b> No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.</p> <p>MM L-29. <b>Intersection No. 17: La Brea Avenue/Slauson Avenue (County of Los Angeles).</b> To the extent that the County of Los Angeles (1) adopts a transportation improvement or</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles County determines to approve the implementation of the following improvements, the Project Applicant shall contribute 5.1% of the total estimated cost to implement the following roadway improvements: (1) Re-stripe the southbound La Brea Avenue approach at Slauson Avenue to provide a shared through/right-turn lane through the intersection, (2) Modify the existing traffic signal to remove the existing southbound overlapping right-turn signal phase, and (3) Contribute 5.1% of the total cost to develop and enhance the traffic signal operations at this location. The resultant southbound approach lane configuration would provide a left-turn lane, two through lanes, and one shared through/right-turn lane. It should be noted that there are three existing departure lanes on La Brea Avenue south of Slauson Avenue.</p> <p>MM L-30. <b>Intersection No. 20: La Brea Avenue/Manchester Boulevard (City of Inglewood).</b> The Project Applicant shall contribute 5.3% of the total estimated cost to implement the following roadway improvements: (1) Provide an additional northbound through lane, (2) Restrict parking along the north side of Manchester Boulevard adjacent to La Brea Avenue during the Saturday Mid-day peak hour and convert the westbound approach right-turn only lane into a shared through/right-turn lane through the intersection, and (3) Contribute 5.3% of the cost estimated</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>to develop and enhance the City of Inglewood ITS program at this intersection. Some parking along the east side of La Brea Avenue will need to be restricted during these time periods and some widening may be required to accommodate this measure. The resultant northbound approach lane configuration would provide one left-turn lane, two through lanes, and one shared through/right-turn lane through the intersection. The resultant westbound approach lane configuration during the Saturday Mid-day peak hour would provide one left-turn lane, two through lanes, and one shared through/right-turn lane.</p> <p>MM L-31. <i>Intersection No. 23: Hawthorne Boulevard/Imperial Highway (City of Hawthorne).</i> To the extent that the City of Hawthorne (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Hawthorne determines to approve the implementation of the following improvements, the Project Applicant shall contribute 7.2% of the total estimated cost to implement the following roadway improvements: (1) Provide an additional northbound right-turn only lane; (2) Modify the southbound approach to provide one additional through lane; (3) Modify the westbound approach to provide an additional westbound left-turn lane; and (4) Contribute 7.2% of the total estimated cost to develop and enhance the traffic signal operations at this location. The resultant northbound approach lane configuration would provide two</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>left-turn lanes, three through lanes, and two right-turn only lanes. The resultant southbound approach lane configuration would provide one left-turn lane, three through lanes, and one shared through/right-turn lane. The resultant westbound approach lane configuration would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures so that the measures may ultimately be infeasible.</p> <p>MM L-32. <b>Intersection No. 24: Centinela Avenue/Florence Avenue (City of Inglewood).</b> No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection to implement the following roadway improvements: (1) Convert the southbound Centinela Avenue approach right-turn only lane at Florence Avenue to provide a shared left-turn/right-turn lane, and (2) develop and enhance the City of Inglewood ITS program at this intersection. The resultant southbound approach lane configuration would provide two left-turn lanes and one shared left-turn/right-turn lane.</p> <p>MM L-33. <b>Intersection No. 26: Prairie Avenue/Manchester Boulevard (City of Inglewood).</b> The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic</p>	



Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.</p> <p>MM L-34. <i>Intersection No. 30: Prairie Avenue/Century Boulevard (City of Inglewood).</i> No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.</p> <p>MM L-35. <i>Intersection No. 33: Prairie Avenue/Imperial Highway (City of Hawthorne).</i> To the extent the City of Hawthorne adopts a city-wide signal synchronization program, the Project Applicant shall contribute 17.3% of the total estimated cost to develop and enhance the ITS program (or a similar traffic signal synchronization system) at this intersection.</p> <p>MM L-36. <i>Intersection No. 35: Crenshaw Drive-Briarwood Lane/Manchester Boulevard (City of Inglewood).</i> The Project Applicant shall contribute 22.6% of the total estimated cost to develop and enhance the City of Inglewood ITS program at this intersection.</p> <p>MM L-37. <i>Intersection No. 38: Doty Avenue-Gate 4/Century Boulevard (City of Inglewood).</i> No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>MM L-38. <i>Intersection No. 39: Yukon Avenue-Gate 5/Century Boulevard (City of Inglewood).</i> No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.</p> <p>MM L-39. <i>Intersection No. 40: Club Drive/Century Boulevard (City of Inglewood).</i> No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.</p> <p>MM L-40. <i>Intersection No. 41: Crenshaw Boulevard/Slauson Avenue (City of Los Angeles).</i> The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.</p> <p>MM L-41. <i>Intersection No. 42: Crenshaw Boulevard/Florence Avenue (City of Los Angeles).</i> The Project Applicant shall contribute 2.4% of the funding towards the installation of the ATSAC at this intersection (as this intersection is not currently operated under the City's ATSAC system).</p> <p>MM L-42. <i>Intersection No. 46: Crenshaw Boulevard/Pincay Drive-90th Street (City of Inglewood).</i> The Project Applicant shall contribute 18.4% of the total estimated cost to</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>implement the following roadway improvements: (1) Restrict parking along the west side of Crenshaw Boulevard north of Pincay Drive-90th Street during the Saturday Mid-day peak hour to allow the southbound curb lane to function as a shared through/right-turn lane; and (2) Contribute 18.4% to develop and enhance the City of Inglewood ITS program at this intersection.</p> <p>MM L-43. <i>Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).</i> The Project Applicant shall contribute 2.7% of the total estimated cost to implement the following roadway improvements: (1) Widen the northbound Crenshaw Boulevard approach to provide two left-turn lanes, two through lanes, and one shared through/right-turn lane; (2) Widen the southbound Crenshaw Boulevard approach to provide one left-turn lane, three through lanes, and two right-turn only lanes; (3) Widen the eastbound Century Boulevard approach to provide two left-turn lanes, three through lanes, and one right-turn only lane; (4) Widen the westbound Century Boulevard approach to provide two left-turn lanes, three through lanes, and one shared through/right-turn lane; and (5) Modify the traffic signal to provide southbound and eastbound right-turn overlapping phases to be operated concurrently during the eastbound and northbound left-turn phases, respectively. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures, and/or other factors such as impacts on parking or adjacent businesses, may cause the lead agency to ultimately conclude that these proposed</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>measures are infeasible.</p> <p>MM L-44. <b>Intersection No. 48: Crenshaw Boulevard/Imperial Highway (City of Inglewood).</b> No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.</p> <p>MM L-45. <b>Intersection No. 55: Western Avenue/Century Boulevard (City of Los Angeles).</b> The Project Applicant shall contribute 9.2% of the funding towards the installation of the ATSAC at this intersection (as this intersection is not currently operated under the City of Los Angeles' ATSAC system).</p> <p>MM L-46. <b>Intersection No. 56: Vermont Avenue/Manchester Avenue (City of Los Angeles).</b> To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute 6.9% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional left-turn lane on the southbound Vermont Avenue approach at Manchester Avenue; and (2)</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>Contribute 6.9% of the total cost to install the ATSSAC/ATCS at the Vermont Avenue/Manchester Avenue intersection (as this intersection is not currently operated under the City of Los Angeles' ATSSAC system). The resultant southbound approach lane configuration would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane.</p>	
<p><b>IV.K.M PARKING</b></p>		
<p><b>Construction Impacts.</b> There would be no adverse impacts to existing street parking bordering the Project Site during construction. Due to the large size of the site, construction workers could park in designated areas on the Project Site. During the grading and excavation phase of the Proposed Project, while Casino operations are still active, temporary parking areas will be created adjacent to the Casino for its patrons. Once grading/excavation work is complete adjacent to the Casino site, permanent parking areas will be designated during the construction phase of the Proposed Project. Adequate parking spaces will be maintained throughout grading/excavation and construction, therefore, impacts due to construction will be less than significant.</p>	<p>MM M-1. At the time of Plot Plan review, the Project Applicant shall provide a Shared Parking Study with the parking requirements for the Project Site and the plan will show where the parking spaces are provided on the site.</p>	<p>Less Than Significant Impact.</p>
<p><b>Operational Impacts.</b> Depending upon the actual bedroom counts that are developed in the residential dwelling units, it is estimated that the Project Site could contain up to approximately 7,700 parking spaces in the residentially-zoned areas of the Project Site to accommodate the parking demand generated by residents on the Project Site. This includes up to approximately 6,000 required resident parking spaces (typically in garages), 700 on-site parking spaces, and 1,000 on-street parking spaces. The actual number of residential parking spaces will be determined on the number and type of dwelling units developed.</p> <p>The parking requirements in the Mixed-Use zone (including guest/visitor parking required for residential units that could be built in the Mixed-Use</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>zone) are proposed to utilize a shared parking methodology. Based on a shared parking analysis for a mixed-use zone of the Proposed Project, 5,326± parking spaces would be needed to sufficiently supply parking at the peak period. Through the parking requirements to be established in the Specific Plan, the Proposed Project would provide adequate parking in accordance with the actual parking demands during each phase of development and occupancy. In total, the Mixed-Use Zone could contain parking structures and lots that could provide up to 7,778 parking spaces. Additionally, the Hollywood Park Specific Plan contains development standards and design guidelines to regulate the overall development of parking for the residential uses. As a result, all of the project's parking demands would be met on site and impacts would be less than significant.</p>		
<p><b>Parking – Land Use Equivalency Program Impacts.</b> Under the Equivalency Program, there would be no substantial variation in the Project's street configurations, or related use of subterranean parking. Street parking would be provided in a manner similar to that of the Proposed Project. As with the Proposed Project, the Equivalency Program would provide residential and mixed use parking at the same standards.</p> <p>For any additional retail, office/commercial and hotel area, the Project Applicant would submit a shared parking study at the time of Plot Plan Review to generate the parking demand for the Project. For the additional residential units, the Project Applicant would apply the parking standards in the Hollywood Park Specific Plan to generate the residential (and guest) parking demands for the Project. Furthermore, compliance with the Hollywood Park Specific Plan and Shared Parking Study will ensure that there is sufficient parking to meet the demand.</p> <p>All Project Design Features and/or recommended mitigation measure to minimize parking impacts under the Proposed Project would be implemented under the Equivalency Program. Consequently, with implementation of applicable mitigation measures, parking impacts attributable to the Equivalency Program would be less than significant.</p>		<p>Less Than Significant Impact.</p>

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## **II. PROJECT DESCRIPTION**

### **A. LOCATION AND BOUNDARIES**

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#### **PROJECT LOCATION AND BOUNDARIES**

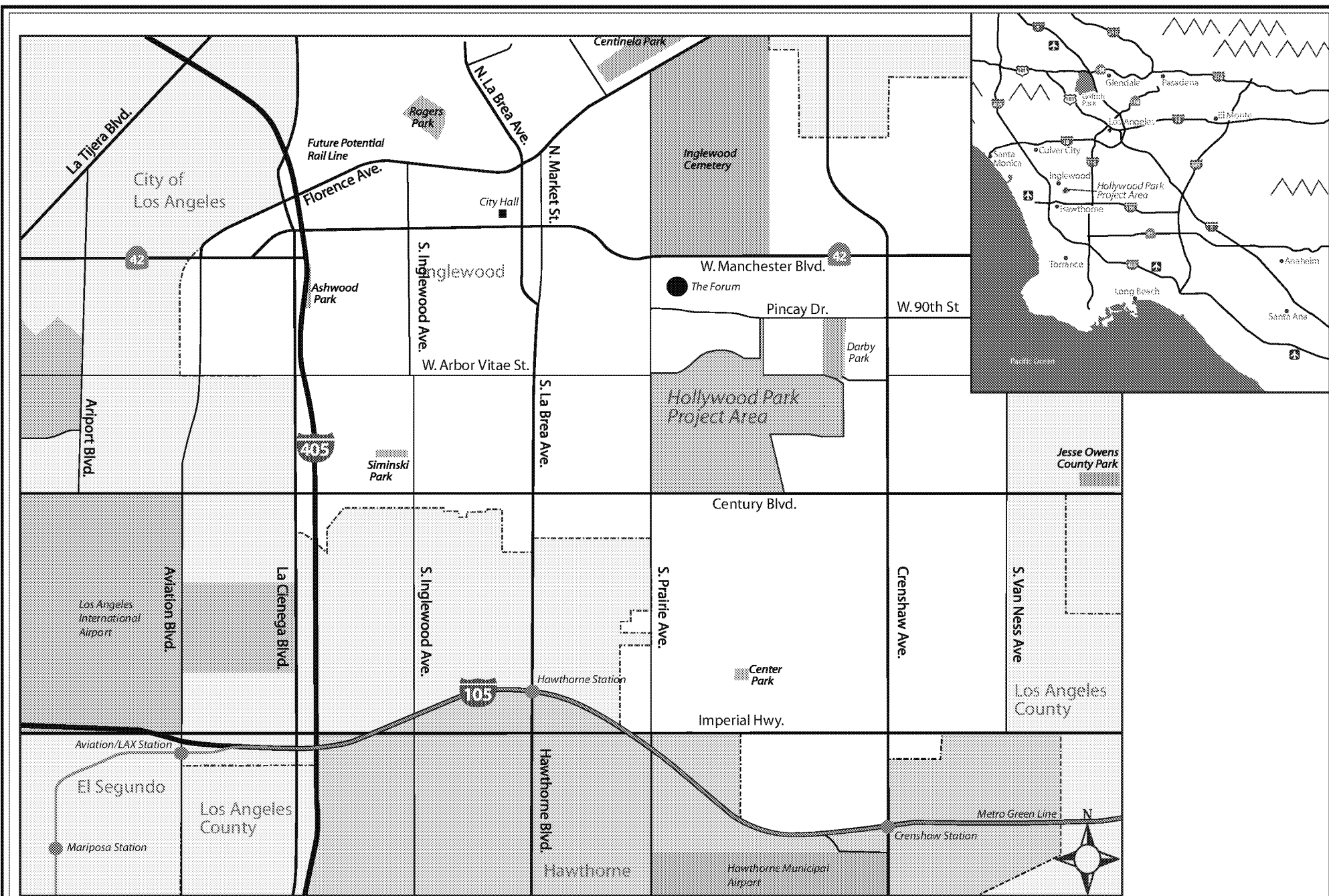
The Project Site is the Hollywood Park Racetrack and Casino property located at 1050 South Prairie Avenue in Inglewood, California. The approximate 238-acre Project Site is bounded on the north by a parking lot, vacant commercial/recreational property, the recent Renaissance residential development and Darby Park. One-story and two-story residential structures are located across 90<sup>th</sup> Street, to the north. One and two-story residential uses are to the east. Century Boulevard is to the south, with one- and two-story commercial retail and restaurant uses along this frontage. One- and two-story commercial retail and restaurant uses are located immediately west of the Project Site across Prairie Avenue. (See Figure II-1, Regional and Project Vicinity Map).

#### **EXISTING GENERAL PLAN AND ZONING DESIGNATIONS**

The General Plan land use designation for the Project Site includes Commercial-Residential and Commercial-Recreational land uses. The Project Site is zoned C-R (Commercial and Recreation). In addition, portions of the Project Site are located 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 Redevelopment Project Area”) - the Century Redevelopment Constituent Project Area and the Manchester-Prairie Redevelopment Constituent Project Area.

#### **SURROUNDING LAND USES**

The Project Site is located in a developed area which is supported by existing urban infrastructure. The surrounding area is comprised of a mix of low-to medium-density residential, commercial, motel, and office uses. The properties immediately surrounding the Project Site are described as follows: on the north side of the Project Site is a vacant lot and the Renaissance Residential development; to the northeast of the Project Site is Darby Park (3400 West Arbor Vitae Street); to the east are single-family residential uses and the Home Depot commercial shopping center; to the south (across Century Boulevard) is a commercial shopping center (the Village at Century Boulevard) and other commercial uses; and to the west (across Prairie Avenue) are several single-story retail/commercial and multi-family residential uses. An aerial view of the surrounding land uses is also depicted in Figure II-2.




Source: Hollywood Park Specific Plan Draft, July 2007; William Hezmalchal Architects.





Legend

 Project Boundary



0 300 600 900 1200  
Feet

Source: Google Earth, 2007.

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## II. PROJECT DESCRIPTION

### B. STATEMENT OF PROJECT OBJECTIVES

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The primary goal of the Proposed Project is to meet the demand for ownership residential housing opportunities and to provide high quality regional retail and commercial/entertainment uses in the City of Inglewood. Specific objectives of the Proposed Project include the following:

1. To contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space;
2. To provide an economically viable project that promotes the City’s economic well-being by significantly increasing property and sales tax revenues and providing high-quality retail uses and the opportunity for transient occupancy tax;
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site;
4. To provide land for a civic/public use;
5. To create exciting community park and open space areas, that exceed the City’s existing General Plan goals of one acre per 1,000 residents, in a manner that meets the needs of the proposed development and is beneficial to the overall community;
6. To add a variety of ownership-housing opportunities, of different product types and prices, in an area of the greater Los Angeles region that is job-rich, thus creating a better balance of housing and employment opportunities;
7. To provide opportunities for viable retail and creative office space in a manner that is complementary to the existing character of the adjoining residential neighborhood;
8. To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and public open space within portions of the Merged Redevelopment Project Area;
9. To create safe, secure and defensible spaces through project design, while also allowing public spaces, such as parks and retail, to be open to the public;
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project;
11. To promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways in a mixed-use project which integrates housing with employment opportunities;

12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities; and
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.

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## II. PROJECT DESCRIPTION

### C. PROJECT CHARACTERISTICS

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#### EXISTING CONDITIONS

The Property was developed as a racetrack in 1938. Currently, it is developed with two main structures: the Racetrack Grandstand and the Pavilion/Casino. (See Figure II-3, Existing Site Plan) The Racetrack Grandstand is an approximately 594,000 square foot building which houses 200 general offices, a maintenance department, print shop, laundry, television department, and two gift shops. There are also several concession stands including two full-service restaurants, five kitchens, and approximately 50 bar areas. The second main structure on the Project Site is the Pavilion/Casino, a six-story, approximately 400,000 square foot building. This building houses a casino, restaurants, sports bar, health club, and area for parties and banquets. Existing facilities and structures associated with ongoing racetrack operations include the Main Racetrack, which is a one and 1/8 mile horse racing track, a Training Track, 18 barns suitable for stabling 2,000 horses, an equine hospital, and 10 small buildings that house repair and maintenance facilities for the Racetrack's fleet of tractors, trucks, buses, and other support equipment. The front of the Grandstand building is landscaped and includes a paddock area where horses can be viewed before each race. Large paved surface parking lots front along both Prairie Avenue and Century Boulevard, extending the length of the property frontage along these two streets.

The general topography of Hollywood Park is relatively flat with a slight slope from north to south. The racetrack facilities are raised slightly on building pads and to the east an escarpment borders Darby Memorial Park. Existing landscaping at Hollywood Park includes the infield grass and shrubs, mature palm trees surrounding the Grandstand and Casino buildings, landscaping around the patron entrance to the racetrack and paddock area, and isolated landscaping and eucalyptus trees in the parking areas and behind the Main Racetrack. The Hollywood Park property line along Century Boulevard and Prairie Avenue is planted with a combination of pine trees, shrubs, and groundcover.

#### Operations and Events

##### *Hollywood Park Race Track*

The Hollywood Park Race Track is traditionally open Wednesday through Sunday for an average of five days per week. The total number of days that the racing facility was open in 2006 was 271 days. Of the 271 total days, 99 were live race days hosted by Hollywood Park and the remaining 172 days were days in which Hollywood Park was a simulcast facility for the other southern California racing associations. From 2001 through 2006, daily attendance ranged from approximately 780 to 23,000. In 2006, the largest day was Derby Day, with attendance that day at 14,460. During the current live race meet, the facility opens at 10:15 a.m. and closes after the last race, which is usually between 5:00 p.m. and 6:00 p.m. for all days except when they run races on Friday night. The last race on Friday night usually runs at around 10:30 p.m. A smaller area of the facility is open later on Wednesday through Sunday for the simulcast of Quarter Horse and Harness races that traditionally run in the evenings.



Source: Google Earth and Christopher A. Joseph & Associates, 2007.



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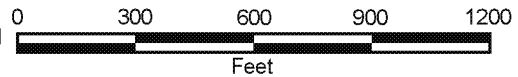


Figure II-3  
 Existing Site Plan

Hollywood Park's primary business is horse racing. During its live racing season, Hollywood Park has concerts and other group events to promote racing and the facility. Other uses for the facility include parking lot rental, non-racing group events and facility rental. When not hosting a live race meet, Hollywood Park opens the barn area for off-site stabling and training.

### *Hollywood Park Casino*

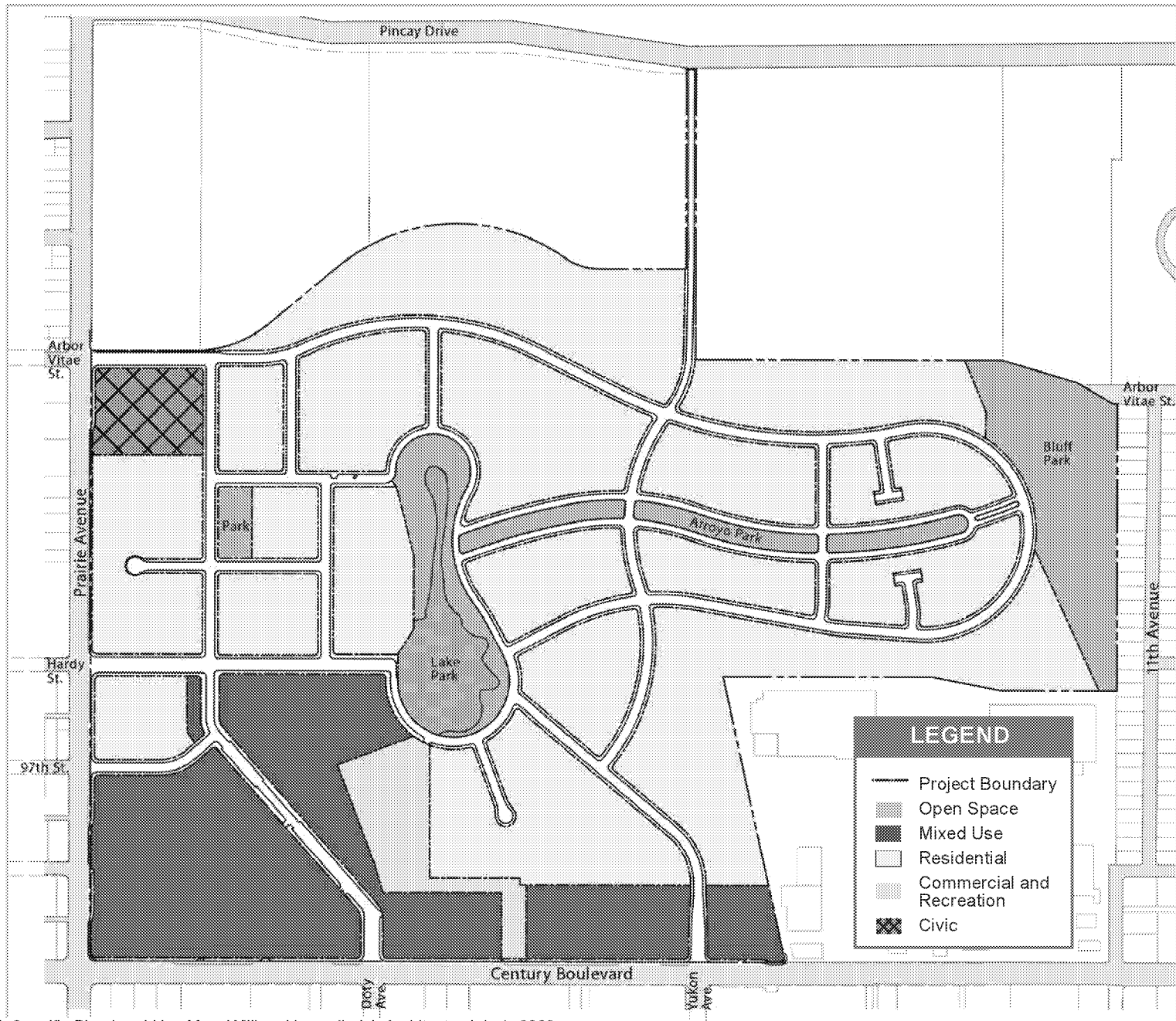
The Hollywood Park Casino is open 24 hours per day, 365 days per year. The core business of the casino is to provide gaming tables and dealers to its patrons. Games offered include Blackjack, Pan 9, Pai Gow Poker, Pai Gow Tiles, Baccarat and various poker games. Other venues that the casino currently offers include charity bingo, group events, night club, health club and other facility rentals. When all areas are open, there have been as many as 2,500 patrons at one time in the facility.

## **PROJECT CHARACTERISTICS**

The Proposed Hollywood Park Redevelopment Project consists of the redevelopment of the approximately 238-acre Project Site, including the Racetrack Grandstand and the Pavilion/Casino and the construction of a new mixed-use development. The Proposed Project includes demolition of most of the improvements and structures on the Project Site, including the Hollywood Park Racetrack and grandstand, and the new construction of approximately 2,995 dwelling units (du), 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, a 300-room hotel including 20,000 sf of related meeting space, and 10,000 sf of community serving uses for the Home Owners' Association (HOA). The Pavilion/Casino will be renovated at its existing location on the Project Site and reconfigured as a maximum 120,000 sf Casino/gambling facility. As part of the Development Agreement, a four-acre site is proposed to be made available to a public entity for civic uses, which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility with respect to construction and operation costs for the respective entity. Approximately 25 acres will be designated for recreation/open space for the development, including 2.5 acres to be developed as an HOA Recreational Facility. The two racetrack infield lakes currently existing on the Project Site will be removed and recreated on the Project Site as an integral component of the proposed Master Plan. (All unit counts and square footages are approximate). The residential product types will include single family, townhomes, stacked flats, condominium buildings and residential units over retail in the mixed-use area. At least 90 percent of the residential development will be for-sale (i.e., ownership) residential product. The Preliminary Land Use Plan is depicted in Figure II-4.

### **Land Use Equivalency Program**

The Proposed Project includes an equivalency program that would provide development flexibility so that the Project could respond to changing community needs and market conditions over the build-out duration of the Project. The equivalency program is intended to allow a limited exchange of retail development, office/commercial development or hotel rooms for development of residential dwelling units, retail, office/commercial or hotel rooms with roughly the same level of environmental impacts, while continuing to provide a balanced project consistent with the mixed-use concept.



Source: Hollywood Park Specific Plan Land Use Map, William Hezmalhaich Architects, July 1, 2008.



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Figure II-4  
Preliminary Land Use Plan

Under the proposed equivalency program: (1) a maximum of 45,000 sf of retail development may be exchanged for up to 281 du, 59,400 sf office/commercial, 141 hotel rooms, or a combination thereof; (2) a maximum of 25,000 sf office/commercial development may be exchanged for up to 119 du, 19,000 sf retail, 59 hotel rooms, or some combination thereof; and, (3) a maximum of 100 hotel rooms may be exchanged for up to 200 du, 32,000 sf retail, 42,000 sf office/commercial, or a combination thereof (collectively, the “Equivalency Program”). Land uses may be exchanged based on specific equivalency factors and subject to the limits set forth above. Under the Equivalency Program, the maximum resulting quantity of additional square footage or number of units is: 505 du, 51,000 sf retail, 102,000 sf office/commercial and 200 hotel rooms. These factors were developed and result in an equivalent number of motor vehicle (traffic) trips for the identified land uses, as discussed in Section IV.L, Traffic/Transportation. The equivalency factors are as follows:

- 1,000 sf retail is equivalent to 6.25 du, 1.32 sf office/commercial, or 3.13 hotel rooms;
- 1,000 sf office/commercial is equivalent to 4.75 du, 0.76 sf retail, or 2.37 hotel rooms; and
- 1 hotel room is equivalent to 2.00 du, 320 sf retail, or 420 sf office/commercial.

Table II-1 below summarizes the land use development program for the following equivalency scenarios: (1) Proposed Project with transferring the maximum allowed retail and office/commercial development and some level of hotel development to obtain a maximum level of residential development; (2) Proposed Project with transferring the maximum allowed office/commercial and hotel development and some level of retail development to obtain a maximum level of residential development; (3) Proposed Project with transferring the maximum allowed retail and hotel development and some level of office/commercial development to obtain the maximum level of residential development; (4) Proposed Project with transferring the maximum level of office/commercial and hotel development to obtain the maximum level of retail development; (5) Proposed Project with transferring the maximum level of retail and hotel development to obtain the maximum level of office/commercial development; and (6) Proposed Project with transferring the maximum level of retail and office/commercial development to obtain the maximum level of hotel development.

The proposed Equivalency Program applies only to the limited transfer of land uses discussed above. Under the Equivalency Program, there would be no change to the Proposed Project’s lot or street configurations, depth of excavation, building pad elevations, or development standards and design guidelines under the Hollywood Park Specific Plan (e.g. height limits, setbacks, etc.).

An analysis of the potential environmental impacts attributable to the proposed Equivalency Program is provided within each impact analysis in Section IV of this EIR. The environmental analysis for the Equivalency Program evaluates each of the six different equivalency scenarios to determine its impacts, including whether the impacts of any scenario are equal to or less than the impacts from the Proposed Project. If the impacts in any given equivalency scenario are equal to or less than the impacts



**Table II-1  
Land Use Program Equivalency Scenarios**

<b>Development Scenario</b>	<b>Residential (Units)</b>	<b>Retail (sf)</b>	<b>Office/Commercial (sf)</b>	<b>Hotel (Rooms)</b>
<b>Proposed Project <sup>a</sup></b>	<b>2,995</b>	<b>620,000</b>	<b>75,000</b>	<b>300</b>
<b>Equivalency Scenarios</b>				
<b>Maximum Housing 1</b>	<b>3,500</b>	<b>575,000</b>	<b>50,000</b>	<b>248</b>
Over/(Under) Proposed Project	505	(45,000)	(25,000)	(52)
<b>Maximum Housing 2</b>	<b>3,500</b>	<b>590,200</b>	<b>50,000</b>	<b>200</b>
Over/(Under) Proposed Project	505	(29,800)	(25,000)	(100)
<b>Maximum Housing 3</b>	<b>3,500</b>	<b>575,000</b>	<b>70,000</b>	<b>200</b>
Over/(Under) Proposed Project	505	(45,000)	(5,000)	(100)
<b>Maximum Retail</b>	<b>2,995</b>	<b>671,000</b>	<b>50,000</b>	<b>200</b>
Over/(Under) Proposed Project	--	51,000	(25,000)	(100)
<b>Maximum Office/Commercial</b>	<b>2,995</b>	<b>575,000</b>	<b>176,400</b>	<b>200</b>
Over/(Under) Proposed Project	--	(45,000)	101,400	(100)
<b>Maximum Hotel</b>	<b>2,995</b>	<b>575,000</b>	<b>50,000</b>	<b>500</b>
Over/(Under) Proposed Project	--	(45,000)	(25,000)	200
<i>Notes:</i>				
<i><sup>a</sup> Only includes land uses from the Proposed Project that correspond to the land uses that can be converted under the Equivalency Program.</i>				
<i>Source: Hollywood Park Land Company, 2008.</i>				

from the Proposed Project, then the analysis of the Proposed Project's impacts and any mitigation measures are applied to the given equivalency scenario. If the equivalency scenario would result in a greater or different impact than the Proposed Project, then such impact is specifically discussed in greater detail and additional mitigation measures are proposed as appropriate.

### **Open Space**

The Proposed Hollywood Park Redevelopment Project would include an extensive open space and public park plan to accommodate the recreational needs of the project's residents, employees and visitors/patrons. Approximately 25 acres in the aggregate will be designated for recreation/open space for the development, including 2.5 acres developed as a Home Owner's Association Recreational Facility (HOA Recreational Facility) and 22.5 acres to be conveyed pursuant to public use easements. The two racetrack infield lakes currently existing on the Project Site will be removed and recreated on the Project

Site as an integral component of the proposed master plan. The open space and recreation areas are identified in Figure II-4, Preliminary Land Use Plan. The open space areas include Lake Park, Champion Park, Arroyo Park and Bluff Park. Arroyo Park, Lake Park and Champion Park include design features to reduce or avoid water quality and hydrologic impacts. See Section IV. F. Hydrology/Water Quality for a further discussion of the features of these parks. Illustrative renderings of the proposed open space areas, including pedestrian friendly linkages, arroyos, and paseos and walkways are provided in Figures II-5 and II-6, respectively.

### **Scale and Massing**

The Proposed Hollywood Park Redevelopment Project would incorporate a variety of building types generally ranging from 25 to 60 feet above finished grade (i.e., 2 to 5 stories), not including architectural features. The hotel structure located on an approximate 2.5-acre parcel on Century Boulevard would be the highest structure within the proposed development at approximately 150 feet. The Preliminary Height Limits Map is illustrated in Figure II-7.

### **Infrastructure**

The Proposed Project would involve various on-and off-site infrastructure improvements to facilitate the development of the proposed mixed-use master planned community. Such infrastructure improvements would include the installation of potable and recycled water lines, sanitary sewers, stormwater detention and conveyance system, electricity infrastructure, natural gas lines, and telecommunication lines. Maps depicting the proposed location of the existing and proposed infrastructure improvements are provided in each respective chapter of Section IV, Environmental Impact Analysis. An overview of the proposed improvements is provided below.

### ***Water***

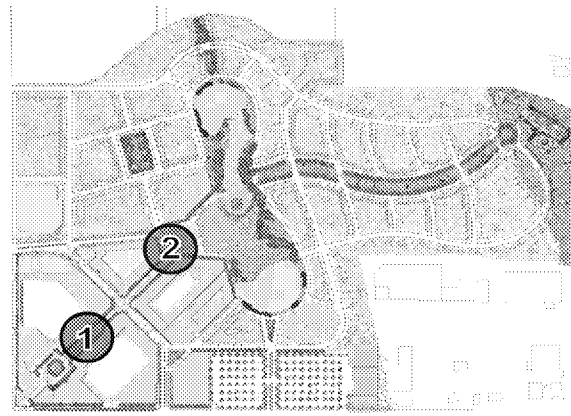
It is expected that the Proposed Project's water demand will be met through water from the City of Inglewood Water Department. The City of Inglewood produced an Urban Water Management Plan in December, 2005. The Plan describes and evaluates sources of water supply, reasonable and practical efficient uses, reclamation, and demand management activities. The Proposed Project would include the construction of a piped water distribution system within the project area. The primary infrastructure would consist of a ring-main with looped extensions to provide service to the proposed lots. Water lines would be installed under the roadways in the public right-of-way and in easements. The Proposed Project would connect to existing City of Inglewood supply lines running along Century Boulevard, Prairie Avenue and W 90<sup>th</sup> St./Pincay Drive. The on-site network would be operated and maintained by City of Inglewood Water Department (or other appropriate agency).



**View 1:** Rambals on the retail main street.



**View 2:** Restaurant Plaza area, with views of the waterfall.



Source: Cooper, Robertson & Partners, 2006.



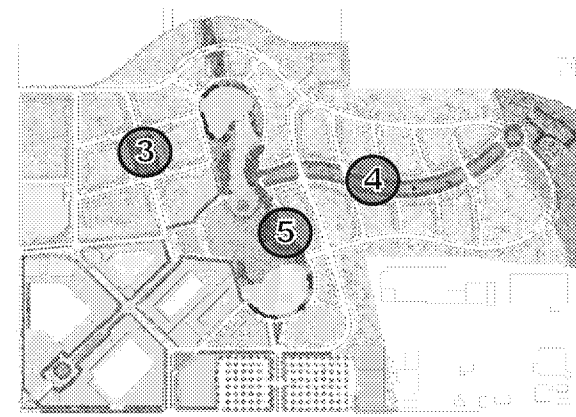
**View 3:** Champion Park, with condo building in the background



**View 4:** Arroyo Park, with townhomes in the background.



**View 5:** Lake Park sitting area with view of waterfall and townhomes in the background.

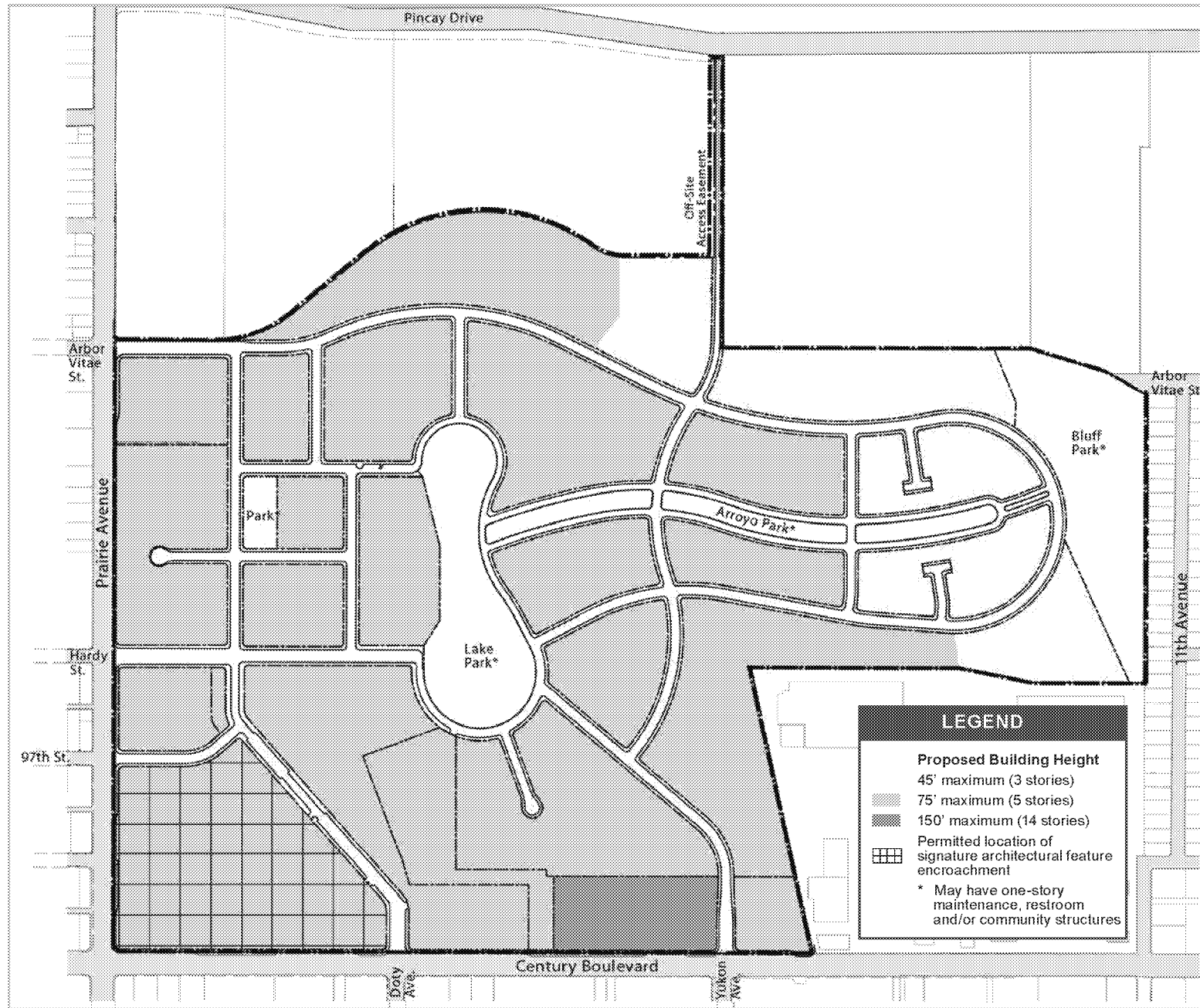


Source: Cooper, Robertson & Partners, 2006.



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Figure II-6  
Illustrative Renderings of the Proposed Project  
Views 3, 4 and 5



Source: Hollywood Park Specific Plan, William Hezmalhalch Architects, July 1, 2008.



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Figure II-7  
Preliminary Building Heights Limit Map

### *Recycled Water*

The Proposed Project proposes to incorporate a recycled water program for irrigation purposes. The Proposed Project's recycled water demand could be met through treated water obtained from the West Basin Municipal Water District (WBMWD) treatment plant in El Segundo. The water provided by the treatment plant meets all the State of California Title 22 regulations and is approved for irrigation use. The Proposed Project would also include the construction of a piped recycled water distribution system within the Project Site. The primary infrastructure would consist of a looped ring-main with extensions to provide service to the public parks, landscaped parkways, and privately maintained common landscape areas within the proposed lots. The proposed infrastructure will be installed under the roadways and within the public right-of-way or easements. The Proposed Project would connect to the existing WBMWD recycled supply line running along Prairie Avenue. The on-site network would then be operated and maintained by WBMWD; the City of Inglewood Water Department will provide the meters and perform the monthly billing.

### *Wastewater*

The Proposed Project's wastewater needs would be met through use of the Los Angeles County Sanitation District's Joint Water Pollution Control Wastewater Treatment Plant (JWPCTP) in the City of Carson. County sewers within the project area will be used to carry flows to the treatment plant. The City of Inglewood sanitary system will be used to convey flows off-site and connect into LACSD trunk sewers running close to the Project Site boundary. It is currently intended that a new on-site sewer gravity system will be provided to collect wastewater flows. On-site wastewater flows will be split providing two external points of connection to existing off-site county trunk sewers, including new off-site routes and retaining existing points of connection where possible. The northern half of the site will be routed from Prairie Avenue along Arbor Vitae Street to the west running a new sewer below the existing public street network or easements and connect into the existing 24-inch county trunk sewer flowing south at S. Osage Avenue. Hardy Street could be used as an alternate route. The remainder of the site will be routed across Century Boulevard and connect into the existing 15-inch county trunk sewer flowing South at Doty Avenue. The minimum size of sewer runs will be 8-inch installed under roadways within the public right-of-way or easements. The Proposed Project will require the abandonment and quit claim of the existing LACSD 12-inch sewer and associated easement that crosses the site. It is currently intended to divert this route and direct off-site upstream flows from Prairie Avenue along Arbor Vitae to the West running a new sewer below the existing public street network and connect into the existing 24-inch county trunk sewer flowing south at S. Osage Avenue. This sewer will still be maintained and operated by LACSD. The wastewater generated by the proposed project will be treated at the JWPCTP.

### *Storm Drains / Hydrology*

The Project Site is predominantly covered with impervious surfaces (effective imperviousness estimated to be 47%) with soft landscaped areas limited to the areas within the Main Track (including two lakes) and Training Track. All on-site storm runoff from roof and at grade parking areas is currently collected

by an on-site system of catch basins and storm drains that discharge into the Los Angeles County Department of Public Works Flood Control District (LACFCD) storm-drain system.

The Project's stormwater discharge flows would be met through use of the LACFCD storm drains off-site running through and adjacent to the Project Site. The Proposed Project would include construction of a new gravity storm drainage network on-site to collect stormwater flows. Storm drain runs will be sized with sufficient hydraulic capacity to accommodate the design hydrology. The minimum size of main line conduit routes shall be 18 or 24-inches for ease of maintenance, unless otherwise approved by the District or City. These will be installed under roadways within the public right-of-way or easements for ease of maintenance. This new system will be maintained and operated by City of Inglewood Department of Public Works upon completion of construction.

The Proposed Project includes a number of Project Design Features (PDFs) intended to reduce or avoid water quality and hydrologic impacts including: site design, source control, and treatment control best management practices (BMPs). The majority of the Project Site (64 percent) will be treated by the Arroyo and Lake Park stormwater treatment system. An additional 2 percent will be treated by a vegetated BMP system in Champion Park. The remaining areas will be treated by vegetated BMPs or catch basin inserts. At least 2,200 linear feet of swales or bioretention areas (i.e., vegetated BMPs) will be used in the mixed use area and high use parking lots to address trash and debris and petroleum hydrocarbons. Collectively, the water quality treatment control PDFs will treat the pollutants of concern in runoff from the 238 acre development. (See PDFs F-1 to F-30, below).

Arroyo Park will be a linear, landscaped project design feature located within the median right-of-way of the Arroyo. A shallow, vegetated swale will be seamlessly integrated into the park and will be designed to capture all runoff generated from the approximately 71 acres of adjacent road surfaces and residential parcels. The park will be publicly accessible with street parking along its entire length, multiple access points, footbridges, and picnic areas.

Lake Park will be a central attraction of Hollywood Park. The approximately nine-acre Lake Park includes an upper and lower lake, and will be landscaped with native and ornamental vegetation around the majority of its perimeter. The upper lake will be shallow and densely vegetated with emergent wetland plants, while the lower lake will be deeper, with a bulk head and some vegetation along its perimeter. A cascading waterfall will separate the upper and lower lakes and a continuously operated pump station will recirculate water in the lake to ensure stagnation does not occur.

### *Natural Gas*

Existing gas facilities within the project area would be used to serve the Proposed Project. The proposed development would tie into existing primary lines running along Prairie Avenue and W. 90<sup>th</sup> Street. New on-site routes would be designed by Southern California Gas Company. These lines would be installed under the roadways and within the public right-of-way. The on-site network would then be operated and maintained by Southern California Gas Company.

### *Electricity*

Existing electrical distribution facilities within the project area would be used to serve the Project Site from the Lennox sub-station. The proposed development would tie into existing primary lines running along Century Boulevard and Prairie Avenue. New on-site routes would be designed by Southern California Edison (SCE). New on-site primary electrical infrastructure would likely include underground routes comprising vaults, conduits, switching features, and transformers, which would be installed throughout the proposed development to service the proposed lots. This infrastructure will be installed under the roadways in the public right of way or within proposed easements. The on-site network would then be operated and maintained by SCE.

### *Telecommunications*

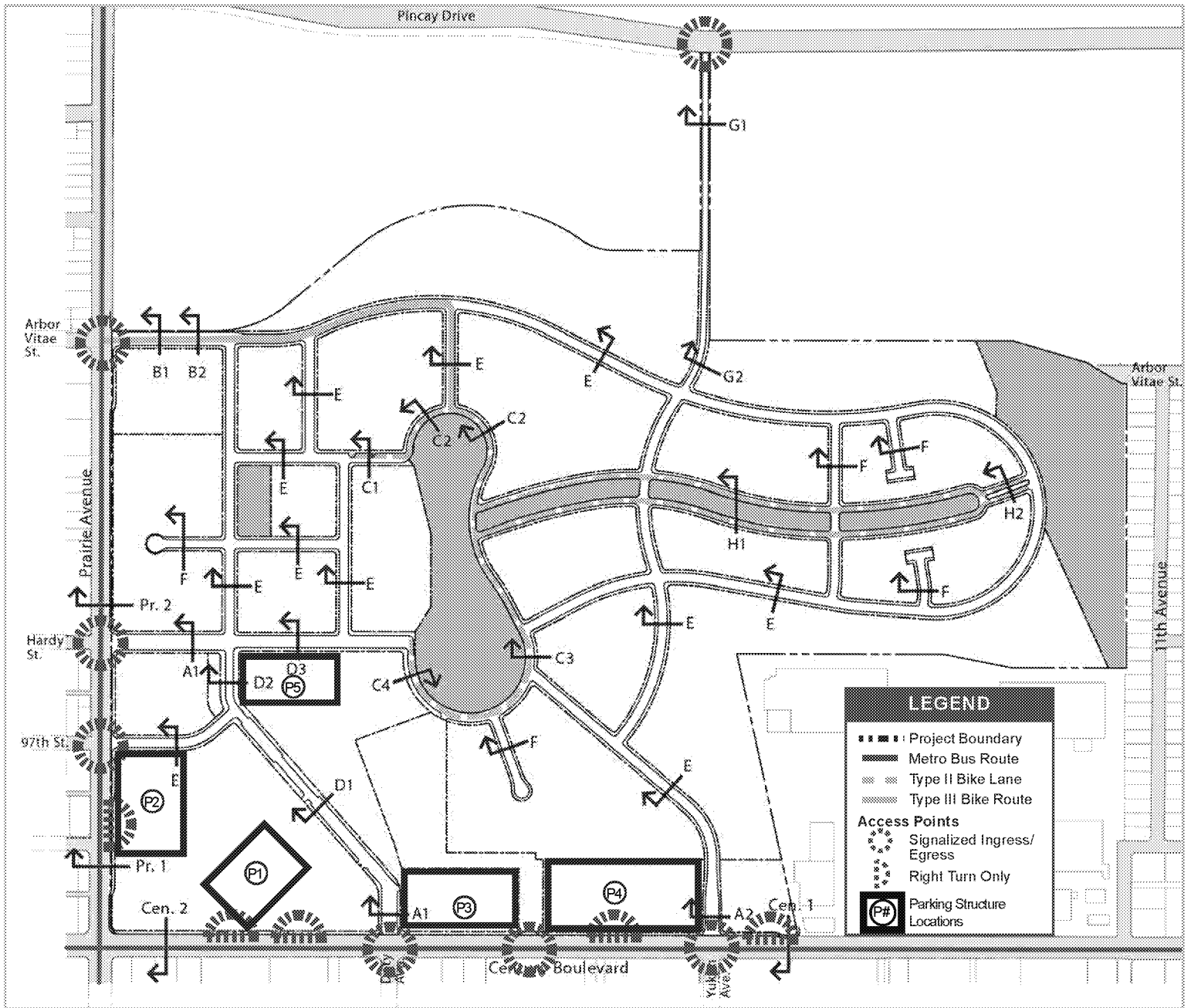
Existing telecommunication distribution facilities within the project area would be used to serve the Project Site. New on-site routes would be designed by AT&T or another selected service provider. New on-site primary infrastructure would likely include underground routes comprised of vaults and conduits which would be installed throughout the proposed development to service the proposed lots. The proposed infrastructure would be installed under the roadways and within the public right-of-way or within proposed easements. The on-site network would then be operated and maintained by AT&T or another appropriate service provider.

### **Circulation and Access**

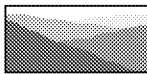
The Conceptual Circulation Map illustrates the schematic location of all of the public streets of the project, based on input from the City Traffic Engineer and the project Traffic Consultant, Linscott Law and Greenspan (LLG). (See Figure II-8, Conceptual Circulation Map) The Conceptual Circulation Map is designed to implement the following objectives:

- Create an interconnected system of streets, tree-lined sidewalks, multi-use trails and bike trails;
- Provide connections to the existing City of Inglewood Street network;
- Promote a walkable pedestrian friendly neighborhood with easy access to the mixed-use core, the parks and open spaces and the community facilities; and
- Provide convenient access to individual residential neighborhoods, employment and the mixed-use core.





Source: Hollywood Park Specific Plan, William Hezmalhalch Architects, July 1, 2008, Parking Structure Overlays provided by WMS, July, 2008.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research



Figure II-8  
Conceptual Circulation Map

The Conceptual Circulation Plan provides a safe and efficient network of roadways, providing for pedestrian trail systems and bicycle circulation in conjunction with the street network. A hierarchy of bicycle connections is incorporated throughout the development to encourage the use of walking, jogging and bicycling.

In addition, there will be an interconnected system of private drives to access the individual residential parcels. These private drives will connect into the public street system; however they will be privately maintained by the HOAs. The actual location of the private drives and alleys will depend on the site planning of each parcel at the time of plot plan review provided in the Hollywood Park Specific Plan.

### *Vehicular Access*

Vehicular access to the proposed development will be provided via seven primary points of entry: (1) via Arbor Vitae at Prairie Avenue; (2) via Hardy Street at Prairie Avenue; (3) via Doty Avenue at Century Boulevard; (4) via Yukon Avenue at Century Boulevard; (5) via Pincay Drive at Carlton Drive; (6) via a driveway entrance into the Casino Parking garage on Century Boulevard, and (7) via 97<sup>th</sup> Street at Prairie Avenue.

### *Transportation Demand Management Strategy*

As part of the proposed circulation plan, the proposed Specific Plan will incorporate a Transportation Demand Management (TDM) Strategy. The details and requirements of the TDM strategy for Hollywood Park will be finalized in conjunction with the project approval process and implemented as part of the Mitigation Monitoring Report and Program (MMRP). Some examples of the TDM strategy features that are proposed to be included in the project are as follows:

- (1) A kiosk or bulletin board providing information about ride sharing and public transportation;
- (2) Bicycle racks at a ratio of one (1) bicycle space for every 50,000 square feet of non-residential development plus an additional three (3) bicycle spaces (developments under 50,000 square feet are exempt from this requirement);
- (3) Employee parking area and safe and convenient access from the employee parking area to all businesses;
- (4) Bus shelter improvements along Century Boulevard and Prairie Avenue adjacent to the project;
- (5) Preferential parking spaces for vanpools;
- (6) Sidewalks or other designated pathways following safe routes from the pedestrian circulation along Century Boulevard and Prairie Avenue to the bicycle parking facilities and into the development; and

(7) Transportation/Parking Benefit Account (similar to flexible spending accounts) used by on-site employers to provide their employees the opportunity to benefit from tax advantages under the Internal Revenue Code for qualified parking, vanpooling and purchasing of transit passes.

### *Non-Vehicular Access*

One of the overall objectives of the Hollywood Park Master Plan is to create a pedestrian friendly, walkable neighborhood. A multi-use trail or walkway will provide pedestrian access around the Lake Park and connect through the Arroyo Park to the Bluff Park. Paseos will be created throughout the development and will encourage pedestrian activity. Pedestrian crossings will be provided at all intersections.

### *On-Site and Frontage Roadway Improvements*

The Proposed Project includes on-site and frontage roadway improvements through methods such as widening, restriping and creating right turn lanes. The on-site and frontage intersections to be improved as part of the Proposed Project are: Prairie Avenue/Arbor Vitae Street, Prairie Avenue/Hardy Street, Prairie Avenue/Century Boulevard, Carlton Drive/Pincay Drive, Doty Avenue/Century Boulevard, Yukon Avenue/Century Boulevard, a Proposed Signalized Driveway/Century Boulevard, and Prairie Avenue/97th Street. For the details of each on-site and frontage improvement, see PDFs L-1 through L-8, below, and Section IV.L, Traffic/Transportation.

All internal roadways and improvements will meet the City's and Los Angeles County Fire Department roadway standards to facilitate vehicular traffic on the roadways as well as provide a safe pedestrian environment. The Proposed Project will include the improvement of a private driveway easement that currently extends from the northeastern portion of the site to Pincay Drive (along the west border of the Renaissance Development).

### *Parking*

Parking for the Proposed Project would be provided to meet the needs of residents, employees and visitors. All parking required to support anticipated on-site development would be provided within the Project Site.

Parking for the commercial and retail land uses will be provided with a combination of surface parking lots, structured parking lots and on-street parking spaces within the designated mixed-use land use plan areas (the "Mixed-Use Zone"). Parking in the Mixed-Use Zone will be provided on a shared basis, based

upon the mix of uses and estimated parking demands.<sup>1</sup> Based on a shared parking analysis conducted for a sample mix of likely uses in the proposed Mixed-Use Zone, the project would have a peak parking demand of approximately 5,326 parking spaces.

As shown in the Conceptual Circulation Plan layout illustrated in Figure II-8, five (5) parking structures were analyzed for the Project. For the purposes of analyzing the maximum impacts related to noise and air quality in this EIR, it is assumed that all five parking structures would be built to their maximum capacity. Although this assumption yields a maximum total of 7,778 spaces in the five parking structures, it is anticipated that less than the maximum parking analyzed will be required to meet the needs of the Proposed Project is significantly less. At the time of Hollywood Park Specific Plan Plot Plan Review for the Mixed-Use Zone, specific design and location of the parking will be presented for review and approval. The precise number of parking spaces required will be determined at the time of Plot Plan review through a shared parking study.

Parking Structure 1 (“P1”) may contain up to approximately 2,119 stalls. Parking Structure 2 (“P2”) may contain up to approximately 1,121 stalls. The Casino Garage (“P3”) may contain up to approximately 2,005 stalls. Parking Structure 4 (“P4”) may contain up to approximately 1,883 spaces. Parking Structure 5 (“P5”) may contain up to approximately 570 parking stalls. Each of the parking garage structures will be developed as open-air parking structures with 42”-high spandrel walls to block light trespass from vehicle headlights.

Residential parking (including guest parking) will be located within the residential land use areas, and in the Mixed-Use Zone to the extent residential units are located there. Required parking for residents will not be shared with commercial uses. Parking will be calculated by a formula based upon the number of bedrooms and types of units. Residential parking for each unit within the Mixed-Use Zone would be cordoned off from commercial parking areas to provide controlled access for residents for security purposes. The precise number of resident and guest spaces for the residential units will be determined at the time of Plot Plan Review per the requirements of the Development Standards in the Hollywood Park Specific Plan. It is estimated that the residential parking will comprise up to approximately 7,700 spaces, of which 6,000 are required resident spaces, 700 are on-site guest/visitor spaces and 1,000 are on-street spaces.

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<sup>1</sup> Individual parking structures will be constructed on an as-needed basis to meet the shared-parking demands of the proposed mixed-use development. Because the required parking will vary depending on the exact characteristics of the precise uses, it is anticipated that the actual parking demand identified herein may vary by up to 20% at different stages of buildout based on the shared parking demand analysis model to be established in the Specific Plan. The EIR assumes development of the maximum number of spaces for the Mixed-Use Zone. Final parking required may be less.

### **Public Benefit Parcel**

As part of the Development Agreement the Proposed Project includes a four-acre site that would be made available to a public entity for civic uses. It is anticipated that the four-acre site could be a combination of one or more public uses such as a school, library, community center, etc., subject to economic feasibility with respect to construction and operation costs for the respective receiving entity. The exact use and benefit of the public benefit parcel, however, will be determined by the decision-makers at the time the project is considered for approval. The precise number of parking for the 4-acre civic site will also be determined at the time of Plot Plan Review and will depend upon the ultimate use selected for the site.

In order to analyze the “worst-case” scenario in terms of anticipating environmental impacts of developing the civic site, the use of this parcel was assumed to be an elementary school (which would have the highest AM peak hour trips) or a public library (which would have the highest PM peak hour trips) depending on the impact. The impacts from other potential civic uses for the site, such as a community center, are anticipated to fall somewhere between the impacts of a school and the impacts of a library. Based on California Department of Education’s 2000 Guide to School Site Analysis and Development, a 4-acre school site could be developed with a 73,600 square foot school with 800 students (i.e., approximately 92 square feet per pupil). Since the proposed use of the public benefit parcel has not been determined, and will not be determined until after the EIR is completed and presented to the lead agency, the sole purpose of analyzing a school site and a library site, depending on the impact being analyzed, is to provide the Lead Agency with flexibility as to the ultimate selection and determination for the use of the site. The school site analysis was used to project a conservative assumption with respect to public utilities, including water and energy demands, and a.m. peak hour traffic, while a public library was used instead of a school site to estimate p.m. peak hour traffic impacts, since a library would have more p.m. peak hour traffic trips, and thus has the potential to result in greater impacts with respect to traffic congestion.

### **Project Signage and Illumination**

Signs and graphics will play a large role in creating and reinforcing the desired neighborhood feel of the various public spaces, shopping, entertainment and civic uses. The proposed Specific Plan will include a comprehensive set of development standards and design guidelines related to signage to achieve a unified and cohesive overall appearance that furthers the design goals of the Merged Redevelopment Plan. Controlled way-finding and identity signage is a major factor in creating and preserving the design character of the project. The proposed signage development standards and design guidelines will include regulations to permit the following types of signage within the Specific Plan area:

- Project or development identification signs (marquee project identity signs);
- Building identification and tenant signs (anchor signage);
- Directional and service signs;

- Advertising signs and wall graphics;
- Temporary signs;
- Building address signs; and
- Regulatory signs.

### **Off-Site Improvements**

Implementation of the Proposed Project would require the reconfiguration of several off-site access points and several roadway intersections outside of the Project Site, in accordance with the mitigation measures listed in Section IV.L, Traffic/Transportation. These improvements would include widening, re-striping, adding signalization and/or reconfiguration of roadway segments and intersections. These improvements would require intermittent, short-term roadway and intersection closures and may involve temporary detours at the affected locations. In addition, off-site utility infrastructure improvements would be required to connect the project to adjacent water lines, sewer lines, and stormdrains located beneath Century Boulevard, Prairie Avenue and W. 90<sup>th</sup> Street/Pincay Drive. (See Figures IV.J-1 through IV.J-3 in Section IV.J, Public Utilities.)

### **PROJECT DESIGN FEATURES**

A number of Project Design Features (PDF's) are proposed to be implemented as part of the Proposed Project. Because PDF's were used in the basis for analyzing the project's environmental impacts, it is recommended that the lead agency incorporate each of the following PDFs as conditions of project approval.

#### **Aesthetics**

- PDF A-1. Public right-of-way landscape plans shall be prepared by a licensed architect for each phase of the project as provided for in the Specific Plan, and shall be implemented as part of the Project.
- PDF A-2. The applicant shall obtain Planning Division approval of plot plans, including: final site plans, landscape plans and architectural drawings, as provided for in the Specific Plan, prior to the completion of working drawings and subsequent issuance of a building permit.
- PDF A-3. The Proposed project shall be developed in conformance with the Preliminary Building Height Limit Map as adopted in conjunction with the approval of the Specific Plan.
- PDF A-4. Signage shall be in conformance with the development standards and design guidelines as provided for in the Specific Plan. Some specific measures include:

- All garage parking areas shall be identified.
- Sign conduits, transformers, junction boxes, etc., must be concealed from view.
- Signs should be clearly legible for universal accessibility. They should meet or exceed ADA standards for type size, type style, color contrast, messaging and heights.
- Typefaces used on identity signs should be easy-to-read fonts. Consideration must be given to colors and materials of the surrounding support walls.
- Freestanding identity signs or development markers should be sited to maintain sight lines at entries and major circulation routes.

PDF A-5. All parking structures within the mixed-use land use areas shall incorporate architectural or site plan design features to shield or avoid light and glare trespass onto adjacent residential properties.

### **Air Quality**

PDF B-1. As part of the Proposed Project plot plan review process, each builder would incorporate energy efficiency measures and other conservation measures from the Hollywood Park Sustainability Strategy Checklist contained in the Hollywood Park Specific Plan.

PDF B-2. The Proposed Project incorporates various sustainable design elements and guidelines to promote energy efficiency and other conservation measures. Some examples of the Proposed Project's sustainable design elements include:

- a new mixed-use development that integrates housing, civic, entertainment and retail amenities (jobs, parks, shopping opportunities, etc.) to help reduce vehicle miles traveled resulting from discretionary automobile trips;
- a mix of land uses that will also contribute to the overall reduction in vehicle miles traveled, by promoting alternative methods of transportation and creating provisions for non-vehicular travel (e.g. pedestrian pathways and paseos, bike paths, etc.) within the Project Site;
- urban infill development, in central Los Angeles County, providing access to several modes of public transportation (buses, rapid transit, and light rail) for travel between neighboring cities;
- a land use plan and land use strategies that encourage higher density development along established transit corridors;

- quality housing opportunities in a job-rich area of Los Angeles County;
- implement street improvements that are designed to relieve pressure on congested roadways and intersections (see Section IV. L. Traffic/Transportation);
- contribution to air quality improvements through the creation of shade to reduce ambient heat produced by paved surfaces by integrating an urban forest concept into the overall landscape design of the Proposed Project;
- planting trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling;
- use of a plant palette that requires low maintenance and climate appropriate plant species;
- conservation by utilization of reclaimed water sources for landscape irrigation purposes;
- natural treatment of stormwater run-off through an arroyo and lake system and in smaller pocket parks;
- using energy efficient bulbs for street lights and other electrical uses;
- creating incentives to increase recycling and reduce generation of solid waste by residential users on the Project Site;
- implementing a recycling program for waste generated by demolition and construction activities, including recycling of existing asphalt and other building materials; and
- using Energy Star appliances.

## **Geology/Soils**

PDF C-1. Development of open space and recreational areas within the RUZ, as delineated in the Geomatrix 2007 Memorandum re Final Report (included in Appendix C-1 to this Draft EIR), shall be consistent with the recommendations of the Geomatrix report which identify the RUZ area as unsuitable for the construction of most structures for human occupancy, but useable for construction of recreational type development (e.g., storage facilities, recreational facilities, greenbelts, parking areas and roads). Structures intended for human occupancy shall not be constructed within the mapped RUZ area. The following uses/facilities/structures are suitable in the RUZ: swimming pool and jacuzzi, tot lots, picnic facilities, meditation gardens, children's playground, fireplace and lounge



areas, dog parks, exercise stations (parcourse), parking spaces at ground level (including covered parking), utility routes, both above and below ground, tennis courts, basketball courts, soccer fields and other open sports fields (volleyball courts, football play areas, etc.), game tables and seating areas in the open, restrooms, locker rooms, changing rooms (e.g., pool cabana), pool equipment rooms, storage lockers, entry pavilions, covered walkways (e.g. pergola and trellis), fences, retaining walls.

### **Hazardous Materials/Risk of Upset**

No PDFs have been proposed for this issue.

### **Cultural Resources**

- PDF E-1. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve the Turf Club Entrance Pavilion Gate B, so that it later can be relocated to Bluff Park as an entry pavilion.
- PDF E-2. Prior to demolition of the Project Site, the Project Applicant shall take steps to preserve Hollywood Park's two primary monuments, Hollywood Gold Cup/Swaps and Native Driver, so that they later can be relocated to Bluff Park as an entry pavilion.

### **Hydrology/Water Quality**

- PDF F-1. Hydrologic source controls will include minimizing runoff from impervious surfaces by routing flows to the Arroyo and Lake Park and using bioretention and other vegetated treatment control BMPs to reduce runoff volumes through evapotranspiration and infiltration.
- PDF F-2. Native and/or climate-appropriate vegetation will be utilized in at least 50% of the developed landscaped areas.
- PDF F-3. The Project's stormwater management system will include the use of the vegetated treatment BMPs, including the Arroyo and Lake Park, as well as parking lot bioretention areas and vegetated swales (where applicable).
- PDF F-4. Treatment control BMPs will be selected to address the pollutants of concern for the Project (see Appendix F-3). These treatment BMPs for the Project include the Arroyo swale, Lake Park, vegetated BMPs, and catch basin inserts. These BMPs are designed to minimize discharge of pollutants to the Maximum Extent Practicable (MEP). Types of treatment control BMPs that will be employed include swales, bioretention areas, catch basin media filtration units, and a wet pond system (e.g., Lake Park).
- PDF F-5. The Project will include numerous source controls, including education programs, animal waste bag stations, street sweeping and catch basin cleaning, an Integrated Pest

Management (IPM) Program per the LAUSD standards for common area landscaping in commercial and multi-family residential areas, use of native and/or non-invasive vegetation, product substitution to minimize zinc and copper roofing materials, and directing runoff to vegetated areas.

- PDF F-6. An education program will be implemented that includes both the education of residents and commercial businesses regarding water quality issues. Topics will include services that could affect water quality, such as carpet cleaners and others that may not properly dispose of cleaning wastes; community car washes (e.g., fund raisers); and residential car washing. The education program will emphasize animal waste management, such as the importance of cleaning up after pets and not feeding pigeons, seagulls, ducks, and geese.
- PDF F-7. The Arroyo swale will be designed to safely convey storm flows without scouring the bottom, eroding banks, or re-suspending sediment.
- PDF F-8. All shorelines within Lake Park will be landscaped and maintained to prevent erosion.
- PDF F-9. All storm drain inlets and water quality inlets will be stenciled or labeled.
- PDF F-10. “No Dumping” signs will be posted around the Arroyo and Lake Park and any other locations that appear prone to illicit dumping.
- PDF F-11. The Home Owners’ Associations will maintain stencils and signs described in PDF F-9 and PDF F-10.
- PDF F-12. Pesticides, fertilizers, paints, and other hazardous materials used for maintenance of common areas, parks, commercial areas, and multifamily residential common areas will be kept offsite or in enclosed storage areas.
- PDF F-13. All trash containers will be covered to prevent contact with stormwater.
- PDF F-14. The Home Owners’ Associations or a Landscape Maintenance District will be responsible for operations and maintenance of the Arroyo, Lake Park, vegetated BMPs, and catch basin media filtration BMPs. Maintenance will be in accordance with a maintenance manual approved by the Director of Planning and Building.
- PDF F-15. Stormwater treatment facilities will be designed to meet or exceed the sizing standards in the LA County SUSMP requirements.
- PDF F-16. Volume-based treatment control BMPs for the Project (i.e., Lake Park, vegetated volume-based BMPs) will be designed to capture 80 percent or more of the annual runoff volume per criteria 2 of the SUSMP.

- PDF F-17. Flow-based BMPs (e.g., the Arroyo, vegetated flow-based BMPs) will be sized using criteria 3, which will provide 80 percent capture or more of annual runoff volume per criteria of the SUSMP.
- PDF F-18. As portions of the site are designed, the size of the facilities will be finalized during the design stage for that portion of the Project by the Project engineer with the final hydrology study, which will be approved by the County of Los Angeles and the City of Inglewood prior to issuing the grading permit(s).
- PDF F-19. The structural BMPs in the stormwater treatment system will be configured to achieve treatment in multiple BMP facilities for the majority of the developed areas. This “treatment train” approach provides more reliable and consistent pollutant removal.
- PDF F-20. Loading dock areas will be covered or designed to minimize run-on and will include catch basin inserts or other appropriate treatment control BMP for treating all runoff prior to discharging to the storm drain system.
- PDF F-21. Direct connections to storm drains from depressed loading docks (truck wells) will be prohibited.
- PDF F-22. Loading docks will be kept in a clean and orderly condition through weekly sweeping and litter control, at a minimum, and immediate cleanup of spills and broken containers without the use of water.
- PDF F-23. Commercial areas will not have repair/maintenance bays or the bays will comply with design requirements.
- PDF F-24. Areas for washing/steam cleaning of vehicles will be self-contained or covered with a roof or overhang; will be equipped with wash racks and with the prior approval of the sewerage agency; will be equipped with a clarifier or other pretreatment facility, and will be properly connected to a sanitary sewer.
- PDF F-25. Retail gasoline outlets or fueling areas will not be included in the Hollywood Park redevelopment.
- PDF F-26. Automotive repair shops will not be included in the Hollywood Park redevelopment.
- PDF F-27. Where feasible, commercial and multifamily parking lots will incorporate vegetated swales or bioretention facilities located in islands or perimeter landscaped areas to promote filtration and infiltration of runoff.
- PDF F-28. Catch basin inserts or media filter vaults will be used to treat parking lot runoff from all areas not treated by vegetated BMPs.

PDF F-29. Treatment of runoff in bioretention (or vegetated swales) and catch basin inserts will be used to address oil and petroleum hydrocarbons from high-use parking lots.

PDF F-30. Mosquito fish will be introduced into the pond to naturally control the population of mosquitoes and midges.

### **Noise**

No specific PDFs have been proposed for this issue.

### **Population, Housing and Employment**

No specific PDFs have been proposed for this issue.

### **Land Use Planning**

PDF I-1. The Proposed Project shall be developed in accordance with the Development Standards and Design Guidelines of the Hollywood Park Specific Plan.

PDF I-2. The Proposed Project shall be developed in accordance with the provisions set forth under the Hollywood Park Specific Plan, including the final adopted version(s) of the Preliminary Land Use Plan and Preliminary Building Height Limit Map.

### **Public Utilities**

#### *Water*

No specific PDFs have been proposed for this issue.

#### *Wastewater*

No specific PDFs have been proposed for this issue.

#### *Energy Conservation*

The PDFs proposed for this issue are contained in PDFs B-1 and B-2.

#### *Solid Waste*

PDF J.4-1. 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.

PDF J.4-2. The Proposed Project shall follow all applicable City of Inglewood policies related to curbside collection and recycling programs.

### **Public Services**

#### *Police Services*

PDF K.1-1. The Proposed Project includes the construction of a police substation within the mixed-use land use designation area.

PDF K.1-2. As part of the Specific Plan Plot Plan review process, a Security Plan detailing measures that will be implemented to provide adequate security both within the interior and exterior of the premises will be submitted for review and approval.

#### *Fire Protection*

No specific PDFs have been proposed for this issue.

#### *School Services*

PDF K.3-1. The Proposed Project includes a 4-acre public benefit parcel that will be offered to the City or other local public agency or organization as part of the Development Agreement. While the student projections along with existing capacity do not indicate the need for a new school, the Applicant and IUSD are in the process of negotiations regarding the 4-acre site within the Project that is proposed to be made available for a public use. If the Applicant and the District do not reach an agreement, the 4-acre public benefit parcel may be utilized by other public agencies.

#### *Parks and Recreation*

PDF K.4-1. The Proposed Project shall include the construction of 25 acres of parks, open space and recreational facilities within the Specific Plan Area in accordance with the Hollywood Park Specific Plan.

#### *Libraries*

No specific PDFs have been proposed for this issue.

### **Traffic/Transportation**

PDF L-1. Intersection No. 28: Prairie Avenue/Arbor Vitae Street

Widen and restripe the northbound Prairie Avenue approach to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue

approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, restripe the eastbound Arbor Vitae Street approach within the existing pavement width to provide one left-turn lane and one shared through/right-turn lane. Also, provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase II development.

PDF L-2. Intersection No. 29: Prairie Avenue/Hardy Street

Widen and restripe the northbound Prairie Avenue approach to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, widen and restripe the eastbound Hardy Street approach within the existing right-of-way to provide one left-turn lane and one shared through/right-turn lane. Also, provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

PDF L-3. Intersection No. 30: Prairie Avenue/Century Boulevard

Widen and restripe the westbound Century Boulevard approach along the north side to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, modify the traffic signal to provide a westbound right-turn overlapping phase to be operated concurrently with the southbound left-turn phase. This intersection will be improved as part of Phase I development.

PDF L-4. Intersection No. 37: Carlton Drive/Pincay Drive

Provide one shared left-turn/through/right-turn lane on the northbound approach to the Carlton Drive/Pincay Drive intersection. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase III development.

PDF L-5. Intersection No. 38: Doty Avenue/Century Boulevard

Restripe the northbound Doty Avenue approach within the existing pavement width to provide one left-turn lane and one shared through/right-turn lane. In addition, provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach. Also, widen and restripe the westbound Century Boulevard approach to

provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

PDF L-6. Intersection No. 39: Yukon Avenue/Century Boulevard

Restripe the northbound Yukon Avenue approach within the existing pavement width to provide one left-turn lane, one through lane, and one shared through/right-turn lane. In addition, provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach. Also, widen and restripe the westbound Century Boulevard approach to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

PDF L-7. Intersection No. 65: Proposed Signalized Driveway/Century Boulevard

Install a traffic signal at the proposed private driveway, to be located approximately 600 feet east of Doty Avenue, to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. Provide one left-turn lane and one right-turn only lane on the southbound approach to the Century Boulevard intersection. In addition, widen and restripe the westbound Century Boulevard approach to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be three through lanes and one right-turn only lane. This intersection will be improved as part of Phase I development.

PDF L-8. Intersection No. 66: Prairie Avenue/97<sup>th</sup> Street

Widen and restripe the northbound Prairie Avenue approach to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, widen and restripe the eastbound 97<sup>th</sup> Street approach within the existing right-of-way to provide one left-turn lane and one shared through/right-turn lane. Also, provide one left-turn lane and one shared through/right-turn lane on the westbound approach. Install a traffic signal at this intersection to accommodate 97<sup>th</sup> Street and the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

**Parking**

PDF M-1. The Proposed Project shall be developed in conformance with the Parking Standards in the Hollywood Park Specific Plan to meet the parking demand of the Proposed Project.

**Project Construction**

Construction of the Proposed Project is anticipated to commence upon approval of all applicable entitlements, currently estimated to occur in early 2009. The anticipated buildout year of the Proposed Project is 2014. While it is difficult to determine in advance exactly when and how long the project approval and entitlement process will take, the following stages of construction are provided as a framework to provide for a reasonably accurate environmental analysis with respect to the Proposed Project's temporary and short-term construction related impacts.

For analytical purposes, the construction analysis presented in this EIR assumes an average of 22 active construction days each month. Unless stated otherwise, it is assumed that all construction activities would be performed in accordance with all applicable state and federal laws and City Codes and policies with respect to building construction and activities. Pursuant to the City of Inglewood Noise Ordinance (Municipal Code Ordinance Section 5-41), the permissible hours of construction are 7:00 a.m. to 8:00 p.m. for areas adjacent to residential zones.

***Construction Schedule/Phasing***

Construction of the Proposed Project is anticipated to begin in 2009. The Project has an anticipated 5-year construction timeline from approval, with full build-out estimated by 2014. The construction process includes: (1) Abatement/Demolition, (2) Excavation/Grading, (3) Utility Infrastructure and Streets and Sidewalks, (4) Structural Foundation, (5) Structural Framing/Building, and (6) Exterior and Interior Finishing.

The grading operation would generally consist of clearing and grubbing, and relocation and compaction of surface soils to construct building pads, streets and other infrastructure necessary for the Proposed Project. The grading will tier the Project Site from its highest elevation of 203 feet above mean sea level (MSL) on the eastern end to its lowest elevation of 90 feet above MSL on the southwestern end.

A final grading plan has not yet been formulated. The Conceptual Grading Plan uses the existing grade and elevation wherever possible, and will generally require no import or export of soils from the Project Site. Grading plans will be reviewed and approved by the City of Inglewood prior to the issuance of grading permit(s). All grading plans and activities will comply with City grading ordinance, dust and erosion control requirements, and NPDES (National Pollutant Discharge Elimination System) requirements.



***Haul Route***

For analytical purposes, it is anticipated that all demolition debris would be recycled to the maximum extent feasible on-site. Salvage material such as steel will be removed from the Project Site. Demolition debris and soil materials from the site that cannot be recycled or diverted will likely be hauled to regional landfills which accept construction/demolition/inert waste from areas within the City of Inglewood. Several regional landfills are located within an approximate 20-mile radius of the Project Site. The local haul route would likely include exiting or entering the Project Site from the 405 Freeway via Century Boulevard or the I-105 Freeway via Prairie Avenue.

***Construction Worker Parking/Staging***

Construction workers who drive to the Project Site will park in designated areas on the Project Site. Due to the relatively large project area, it is anticipated that all construction worker vehicles and construction equipment could be accommodated on site without affecting adjacent neighborhoods.

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## II. PROJECT DESCRIPTION

### D. DISCRETIONARY ACTIONS

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The City of Inglewood Planning and Building Department (the City) is the lead agency for the Proposed Project. In order to construct the Proposed Project, the applicant is requesting approval of the following discretionary actions from the City and the Inglewood Redevelopment Agency (serving as a responsible agency):

- Certification of the Environmental Impact Report (EIR);
- General Plan Amendment;
- Redevelopment Plan Amendment approved by the Inglewood Redevelopment Agency;
- Adoption of Specific Plan;
- Zone Change;
- Vesting Tentative Tract Map(s);
- Development Agreement between Developer and City of Inglewood;
- Owner Participation Agreement between the Developer and the Inglewood Redevelopment Agency; and
- Community Facilities District (CFD) and other municipal financing vehicles (such as landscaping and lighting districts).

The City's and Redevelopment Agency's approval of these actions is discretionary, requiring compliance with CEQA. Subsequent to these discretionary actions, the City would issue other required discretionary approvals and all other required permits, including necessary ministerial permits such as building and grading permits. In addition to the specific discretionary actions to be requested from the City of Inglewood, several discretionary approvals may be required from various responsible agencies, including but not limited to:

- Airport Land Use Commission;
- Los Angeles County (Public Works, Fire Department);
- Regional Water Quality Control Board Discharge Permit for Title 22 Water to the Los Angeles County Storm Drain System;
- SCAQMD Rule 403 Large Operation Notification;
- L.A. County Sanitation District Sewer Main Re-Alignment Permit; and
- L.A. County Storm Drain Realignment/Connection Permit.

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### III. RELATED PROJECTS

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CEQA requires that Environmental Impact Reports (EIRs) analyze “cumulative impacts,” defined in the State CEQA Guidelines Section 15355 as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” In addition, State CEQA Guidelines Section 15130 indicates that the analysis of cumulative impacts need not be as in-depth as what is performed relative to the Proposed Project, but instead is to “be guided by the standards of practicality and reasonableness.” The cumulative impacts analysis considers the anticipated impacts of the Proposed Project along with reasonably foreseeable growth. According to CEQA Guidelines Section 15130(b)(1), reasonably foreseeable growth may be based on:

- A list of past, present, and probable future projects producing related or cumulative impacts; and/or
- A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental planning document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.<sup>1</sup>

For purposes of the cumulative impact analysis for this Draft EIR, a list of past, present, and probable future projects was determined to be the most accurate methodology in which to evaluate cumulative impacts. A summary of projections contained in the City’s adopted General Plan was not used because the City is currently in the process of updating the General Plan and associated growth forecasts. As such, basing the cumulative impacts analysis on the growth projections in the current General Plan might not present an accurate assessment. In addition, for certain issue areas such as traffic, the project’s area of potential affect includes several jurisdictions with separate growth forecasts. In this case, the methodology employed included a combination of the related project list of past, present and reasonably foreseeable known future projects and an ambient growth factor to address unknown projects and ambient growth rates.

Cumulative impact study areas are defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area, and related projects contained within, for each individual environmental impact issue may vary. For example, a cumulative visual impact generally could only affect the area within the viewshed of the Project Site, while a cumulative air quality impact could affect the entire South Coast Air Basin. The specific boundaries, and the related projects within those boundaries, for the cumulative study area of each environmental issue, are identified in the applicable environmental issue section in Section IV (Environmental Impact Analysis) of this Draft EIR. For purposes of the cumulative impact analysis, Table III-1 identifies a comprehensive list of past,

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<sup>1</sup> Clarification based on *Communities for a Better Environment v. California Resources Agency*, 126 Cal.Rptr.2d 441 (2002).

present, and probable future projects as derived from building and planning application records from the following jurisdictions: City of Inglewood, City of Culver City, City of Hawthorne, City of Los Angeles, and the County of Los Angeles, which have the potential to generate cumulative environmental impacts when evaluated in conjunction with the Proposed Project (i.e., the “Related Projects” list).<sup>2</sup> The general location of each identified Related Project in relation to the Project Site is provided in Figure III-1 on page III-8.

The Related Projects list also included potential City of Inglewood redevelopment projects for which no planning applications have been filed with the City. These added projects were considered for planning purposes even though no applications have been submitted and it is possible that no new development would occur in the horizon of the Proposed Project. Nonetheless, it is possible that the potential applicants may file these projects for consideration during the horizon for the build out of the Proposed Project. Land use information for some of these sizable projects (i.e., the Forum site, the Home Stretch Project, etc.) was obtained based on discussions with potential applicants. Collectively, the Forum, Homestretch, and the newly initiated Inglewood Promenade represent approximately three-quarters of the anticipated future growth within the City. Although some of the Related Projects listed in Table III-1 may never be pursued or developed, this EIR conservatively assumes their impacts in the cumulative analysis conditions and therefore represents a “worst-case” analysis. In addition, the EIR does not assume any mitigation measures associated with these related projects. It should be noted that the potential expansion of the Los Angeles International Airport (i.e., the LAX Master Plan) was listed as a related project (see No. LA-17 in Table III-1). However, separate trip generation forecasts have not been developed as its future growth is uncertain at this time and is too speculative to analyze. In addition, the LAX Master Plan is a long term concept for possible future growth and expansion of the facility and has not yet been defined as a specific project while the Hollywood Park Redevelopment project will be developed on a relatively short term basis. It should be noted that although no separate trip generation forecasts have been developed for the LAX Master Plan, this traffic analysis does consider continued growth of the airport through the application of the ambient traffic growth factor.

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<sup>2</sup> *Linscott, Law and Greenspan; Revised Traffic Impact Study for the Hollywood Park Redevelopment Project, August 1, 2008.*

**Table III-1  
Related Projects List**

MAP NO.	PROJECT NAME/ PROJECT NUMBER	LOCATION	LAND USE	SIZE	STATUS
<b>CITY OF INGLEWOOD <sup>a</sup></b>					
I-1	Inglewood Promenade	Southeast corner of Prairie Avenue and Century Boulevard	Retail	1,792,472 SF	EIR Initiated
I-2	The Renaissance Project	3590 West Pincay Drive	Single-Family Housing	188 DU	Under Construction <sup>b</sup>
I-3	Market Plaza	Southeast corner of La Brea Avenue and Florence Avenue	Retail Restaurant	39,800 SF 10,000 SF	No Planning Application Filed
I-4		224-234 West Manchester Boulevard	Commercial	12,029 SF	Proposed
I-5	Prairie Promenade	Southwest corner of Prairie Avenue and Century Boulevard	Retail	97,490 SF	No Planning Application Filed
I-6		704 North Market Street	Condominium	6 DU	Proposed
I-7		10418 South Prairie Avenue	Office	3,000 SF	Proposed
I-8	AUTOMAX Automotive Supercenter	Northwest corner of Prairie Avenue and Imperial Highway	Retail	49,000 SF	No Planning Application Filed
I-9		325 North Hillcrest Boulevard	Church	5,983 SF	Proposed
I-10		812 South Osage	Transitional Housing	20 DU	Proposed
I-11		311 Queen Street	Condominium	8 DU	Proposed
I-12		817 East Manchester Boulevard	Office	12,950 SF	Proposed
I-13		9310 South La Cienega Boulevard	Office/Warehouse	9,000 SF	Proposed
I-14		250-256 West Ivy Avenue	Warehouse	15,774 SF	Proposed
I-15		315-345 Glasgow Avenue	Motorcycle Sales	480,000 SF <sup>c</sup>	Proposed
I-16		11411-11441 South Crenshaw Boulevard	Retail	101,000 SF	Proposed
I-17	Forum Site <sup>d</sup>	3900 West Manchester Boulevard	Condominium Retail	1,000 DU 250,000 SF	No Planning Application Filed

**Table III-1  
Related Projects List**

MAP NO.	PROJECT NAME/ PROJECT NUMBER	LOCATION	LAND USE	SIZE	STATUS
I-18		530-534 East Queen Street	Condominium	5 DU	Proposed
I-19	Home Stretch at Hollywood Park <sup>b</sup>	Southeast corner of Prairie Avenue and Pincay Drive	Retail	796,970 SF	No Planning Application Filed
I-20		10800 South Prairie Avenue	Gas Station Convenience Market Retail	12 VFP 3,750 SF 4,200 SF	Proposed
I-21	Locust Senior Housing Project	111 North Locust Street	Housing Senior Center	58 DU 33,122 SF	Proposed
I-22		1300 North Centinela Avenue	Commercial	19,920 SF	Proposed
I-23		502-508 Eucalyptus Avenue	Condominium	25 DU	Proposed
I-24		720 East Florence Avenue	Mausoleum	17,232 SF	Proposed
I-25		733 South Hindry Avenue	Transitional Housing	236,996 SF	Proposed
I-26		106 Manchester Boulevard	Adult School/Day Care Center	27,477 SF	Proposed
I-27		10318 South Prairie Avenue	Retail/Office	10,000 SF	Proposed
I-28		10801 South Prairie Avenue	Supermarket Expansion	14,000 SF	Proposed
I-29		3947 Imperial Highway	Hotel	12,875 SF	Proposed
I-30		721-723 South Glasgow Avenue	Office/Warehouse	19,000 SF	Proposed
I-31		11901 South Yukon Avenue	Single-Family Housing	9 DU	Proposed
I-32		11050 South Prairie Avenue	Shopping Center	7,981 SF	Proposed
I-33		10530 South Prairie Avenue	Supermarket	11,506 SF	Proposed
I-34		222 West Spruce Avenue	Condominium	10 DU	Proposed
I-35		546 West Olive Street	Condominium	12 DU	Proposed
I-36		417-420 North Market Street	Condominium	12 DU	Proposed
<b>CITY OF CULVER CITY <sup>e</sup></b>					
CC-1	Sony	10202 Washington Boulevard	Office	986,000 GSF	Proposed
CC-2	Westfield Fox Hills Mall Expansion	200 Fox Hills Mall	Retail	293,786 GSF	Approved

**Table III-1  
Related Projects List**

MAP NO.	PROJECT NAME/ PROJECT NUMBER	LOCATION	LAND USE	SIZE	STATUS
CC-3	Chevron Gas Station	5975 Centinela	Gas Station	3,314 GSF	Approved
CC-4	Fire Station No. 3	6030 Bristol Parkway	Fire Station	12,156 GSF	Approved
CC-5		700-701 Corporate Pointe	Retail Office	4,242 GSF 240,612 GSF	Approved
CC-6	Symantec Office Development	800-900 Corporate Pointe	Research and Development	550,000 GSF	Under Construction
<b>CITY OF HAWTHORNE <sup>f</sup></b>					
H-1	2004PD02	13436 Roselle Avenue	Single-Family Housing	21 DU	Proposed
H-2	2004PD04	14016 Lemoli Avenue	Single-Family Housing	11 DU	Proposed
H-3	2004PD08	13912-24 Lemoli Avenue	Single-Family Housing	14 DU	Proposed
H-4	2005PD03	13812 Cordary Avenue	Single-Family Housing	15 DU	Proposed
H-5	2006PD01	Prairie Avenue and Jack Northrop Avenue	Commercial/Industrial Condominiums	99 DU	Proposed
H-6	2006PD05	14114-28 Kornblum Avenue; 3645-59 Rosecrans Avenue	Condominiums Commercial	28 DU 18,600 SF	Proposed
H-7	2004CU03	11436 Hawthorne Boulevard; 11434 & 11500 Acacia Avenue	Hotel	300 Rooms	Proposed
H-8	2006GP03	4500 West 116 <sup>th</sup> Street	Single-Family Housing	130 DU	Proposed
H-9	2006CZ06	12400 Hawthorne Boulevard	Single-Family Housing Office/Retail	610 DU 1,564,864 SF	Proposed
<b>CITY OF LOS ANGELES <sup>g</sup></b>					
LA-1	EAF 2002-2623	5837 Vermont Avenue	Fast-Food Restaurant	3,700 SF	Proposed
LA-2	Los Angeles County Office Park	Slauson Avenue/Los Angeles Street	Office Park	447,500 SF	Proposed
LA-3	KFC/Long John Silver EAF 2003-2194	1148 Manchester Avenue	Fast-Food Restaurant With Drive-Through	3,152 SF	Proposed
LA-4	EAF 2004-3570	5805 Crenshaw Boulevard	Gas Station With Market & Car Wash Fast-Food Restaurant With Drive-Through	12 VFP 936 SF	Proposed
LA-5	EAF 2004-7828	605 Imperial Highway	Shopping Center	12,289 SF	Proposed
LA-6	Vermont Manchester Village 2004-CEN-1591	8300 Vermont Avenue	Office	220,000 SF	Proposed

**Table III-1  
Related Projects List**

MAP NO.	PROJECT NAME/ PROJECT NUMBER	LOCATION	LAND USE	SIZE	STATUS
LA-7	South Los Angeles High School No. 3; 2004-CEN-1977	860 Slauson Avenue	High School	1,250 Students	Proposed
LA-8	South Region Elementary School No. 1 2005-CEN-1983	Main Street/88 <sup>th</sup> Place	Elementary School	1,050 Students	Proposed
LA-9	Central Region Elementary School No. 16; 2005-CEN-1981	Main Street/57 <sup>th</sup> Place	Elementary School	675 Students	Proposed
LA-10	ENV 2005-1287	5506 Vermont Avenue	Private School Expansion	13,700 SF	Proposed
LA-11	ENV 2006-1210	8735 Western Avenue	Apartments Commercial	184 DU 25,500 SF	Proposed
LA-12	ID No. 1591	5227 Knowlton Street	Apartments	187 DU	Proposed
LA-13	Century Pacific Hotel; ID No. 1682	6225 West Century Boulevard	Hotel	180 Rooms	Proposed
LA-14	Westchester Lutheran School; ID No. 1871	7831 Sepulveda Boulevard	Private School	600 Students	Proposed
LA-15	Marina Honda; ID No. 2426	5850 Centinela Avenue	New Car Sales	42,391 SF	Proposed
LA-16	Western Federal Credit Union; ID No. 2706	8632 Sepulveda Boulevard	Walk-In Bank	3,621 SF	Proposed
LA-17	LAX Master Plan <sup>h</sup>	1 World Way	Airport Expansion	20.9 MAP	Proposed
LA-18	Playa Vista	South of Jefferson Boulevard, east of Lincoln Boulevard	<u>Remaining Phase I:</u> Residential Office Retail <u>Tract No. 52092:</u> Office Sound Stages Production Support/Stage Support <u>Phase II:</u> Residential Office Retail Community Center	1,646 DU 1,255,000 SF 65,000 SF  572,050 SF 332,500 SF 797,400 SF  2,600 DU 175,000 SF 150,000 SF 40,000 SF	Under Construction         Under Construction         Approved
<b>COUNTY OF LOS ANGELES <sup>1</sup></b>					



**Table III-1  
Related Projects List**

MAP NO.	PROJECT NAME/ PROJECT NUMBER	LOCATION	LAND USE	SIZE	STATUS
LC-1	Magic Johnson Fitness Center; 02-283	5045 Slauson Avenue	Fitness Center	37,000 SF	Proposed
LC-2	03-130	6200-6220 South La Brea Avenue	Condominiums	14 DU	Proposed
LC-3	02-202	1500-1600 Block of Gage Avenue	Single-Family Housing	32 DU	Proposed
LC-4	03-139	5230 Pacific Concourse Drive	Apartments	450 DU	Proposed
LC-5	01-009	4952 West 112 <sup>th</sup> Street	Condominiums	25 DU	Proposed
LC-6	03-305	10300 Inglewood Avenue	Restaurant	1,300 SF	Proposed
LC-7	02-025	4615 Slauson Avenue	Apartments	39 DU	Proposed
LC-8	02-169	5101 Overhill Drive	Condominiums	72 DU	Proposed
LC-9	02-169	1700 120 <sup>th</sup> Street	Day Care Center/School	3,500 SF	Proposed
LC-10	TR067377	1535 West 120 <sup>th</sup> Street	Condominiums	69 DU	Proposed
LC-11	03-167	441 East 132 <sup>nd</sup> Street	Adult Day Care Center	0.58 Acre	Proposed
LC-12	04-014	13218/24 Avalon Boulevard	Multi-Family Residential	1.72 Acre	Proposed
LC-13	TR063271	10721 Buford Avenue	Townhouses	11 DU	Proposed
LC-14	TR061784	12628 Avalon Boulevard	Condominiums	35 DU	Proposed
LC-15	R2005-00127	11100 South Western Avenue	High School	1,800 Students	Proposed
LC-16	TR062864	1743 Imperial Highway	Condominiums	38 DU	Proposed

<sup>a</sup> City of Inglewood Planning Department.

<sup>b</sup> Approximately 207 units of the total 395-unit Renaissance development project were constructed and occupied when the baseline traffic count data was collected. The remaining 188 units were therefore factored into the related project table for purposes of estimating cumulative impacts.

<sup>c</sup> For analytical purposes, a total of 66,000 sf of sales/repair area was used to analyze cumulative impacts. The remaining floor area is proposed to be used solely for ancillary storage.

<sup>d</sup> Based on information provided by the current property owner.

<sup>e</sup> City of Culver City Planning Department.

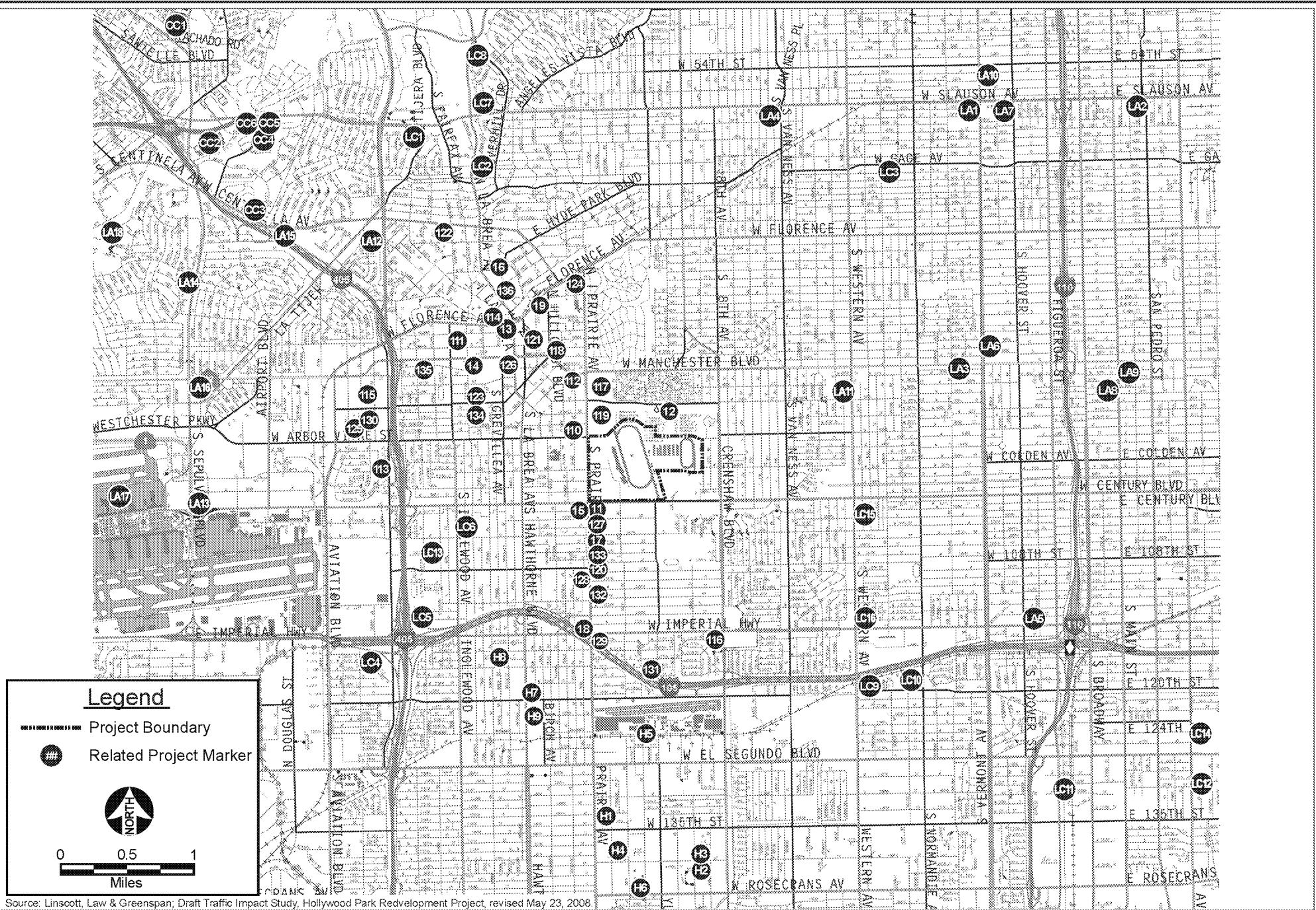
<sup>f</sup> City of Hawthorne Planning Department.

<sup>g</sup> City of Los Angeles Departments of Planning and Transportation.

<sup>h</sup> Additional 20.9 million annual passengers (MAP) based on 58.0 MAP environmental baseline and 78.9 MAP year 2015 forecast outlined in Table F3-1, Summary of Activity by Alternative - 2015, LAX Master Plan Final EIR, April 2004.

<sup>i</sup> County of Los Angeles Department of Regional Planning.

Source: Linscott, Law and Greenspan; Draft Traffic Impact Study, Hollywood Park Redevelopment Project, August 1, 2008.



**Legend**

- Project Boundary
- Related Project Marker

0 0.5 1  
Miles

NORTH

Source: Linscott, Law & Greenspan; Draft Traffic Impact Study, Hollywood Park Redevelopment Project, revised May 23, 2008

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### A. AESTHETICS

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#### ENVIRONMENTAL SETTING

##### Existing Visual Character

###### *Project Site*

The Project Site is the Hollywood Park Racetrack and Casino, which is located on approximately 238 acres in the City of Inglewood at the intersection of Prairie Avenue and Century Boulevard. The Project Site is currently developed with two main structures. The Racetrack Grandstand is an approximately 594,000 sf building which houses 200 general offices. Additionally located in the building are a maintenance department, print shop, laundry and dry cleaning facility, television department, and two gift shops. There are also several concession stands including two full-service restaurants, five kitchens, approximately 50 bar areas, and two gift shops. The second main structure on the Project Site is the Pavilion, a six-story, approximately 400,000 sf building. The Pavilion houses a Casino, restaurants, sports bar, health club, and area for parties and banquets. Representative on-site photographs of the Project Site are provided in Figures IV.A-1 through IV.A-4.

The Project Site is centrally located within the City and provides a visual landmark from surrounding uses and major transportation corridors, such as Century Boulevard and Prairie Avenue, as depicted in Figure IV.A-1, Views 1-3, and Figure IV.A-2, Views 4 and 5. The Casino displays the signature Hollywood Park sign, which along with the Grandstand are among the most prominent views within the City. A combination of landscaping, fountains, and benches is directly adjacent, which is well screened by the 80 foot tall façade of the Grandstand. The racetrack provides views of the surrounding area and is a visually appealing open area with two infield lakes and attractive landscaping (see Figure IV.A-2, View 6, and Figure IV.A-3, Views 7-9 for a complete panoramic view from the Grandstand facing northeast to southeast). Figure IV.A-4, View 10 provides a view of the horse showing area at the main entrance of Hollywood Park, which is representative of the landscaping throughout the facilities. The Pavilion (Hollywood Park Card Club) is landscaped with low growth ground covering, Mexican Fan Palms, ornamental palms, and a large entry fountain. The remaining area of Hollywood Park property consists of paved parking areas and sparse landscaping.

###### *Surrounding Properties*

###### *Century Boulevard Corridor*

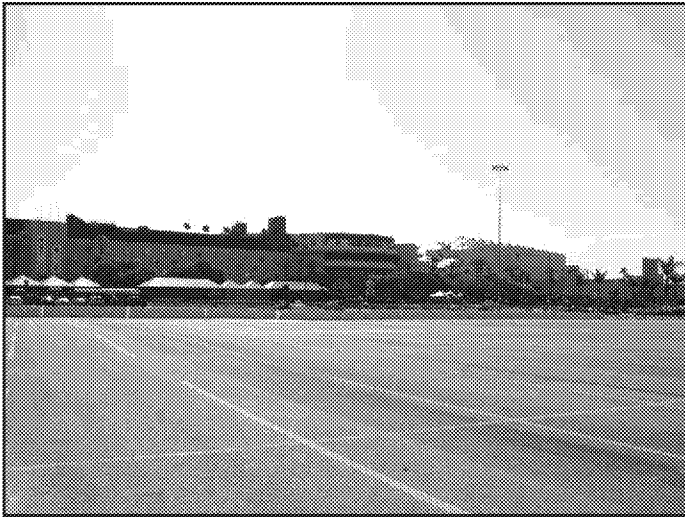
Century Boulevard is located immediately south of the Project Site and is characterized as a major commercial corridor that runs east and west through the City of Inglewood. Southeast of the Project Site at the intersection of Century Boulevard and Crenshaw Boulevard is a large commercial shopping center. The majority of Century Boulevard from Prairie Avenue to Crenshaw Boulevard is characterized by one-



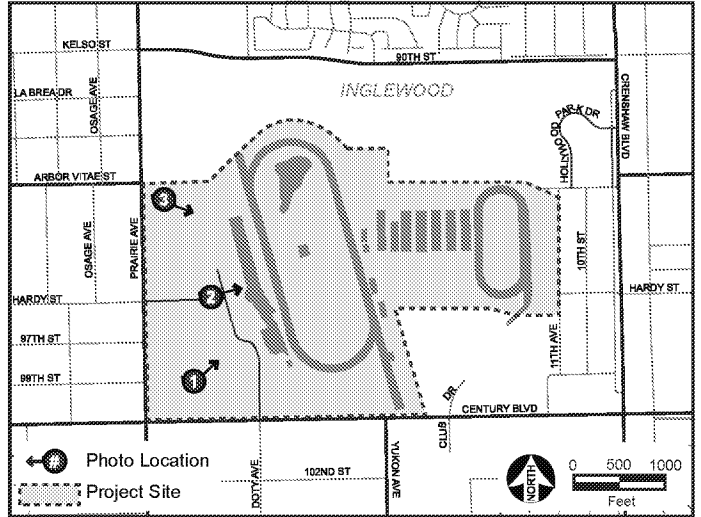
**View 1:** View of the Hollywood Park Casino entrance from the on-site parking lot facing northeast.



**View 2:** View of the main entrance of Hollywood Park Racetrack from Hardy Street facing east.



**View 3:** View from the northwestern portion of the Project Site facing southeast towards Hollywood Park Racetrack.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

Figure IV-A-1  
Views of the Project Site  
Views 1, 2 and 3



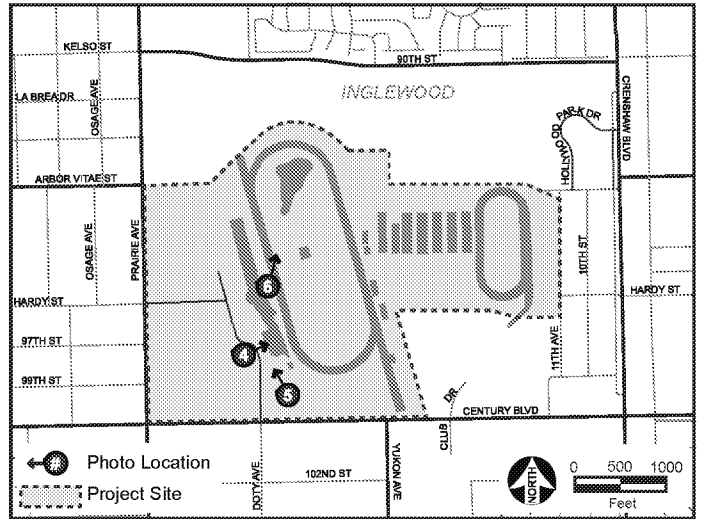
**View 4:** View of Hollywood Park Casino from the on-site parking lot.



**View 5:** View of on-site parking facing northwest from the entrance of Hollywood Park Casino.



**View 6:** View of Hollywood Park Racetrack looking northeast. Views of adjacent residential uses can be seen.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

Figure IV-A-2  
Views of the Project Site  
Views 4, 5 and 6



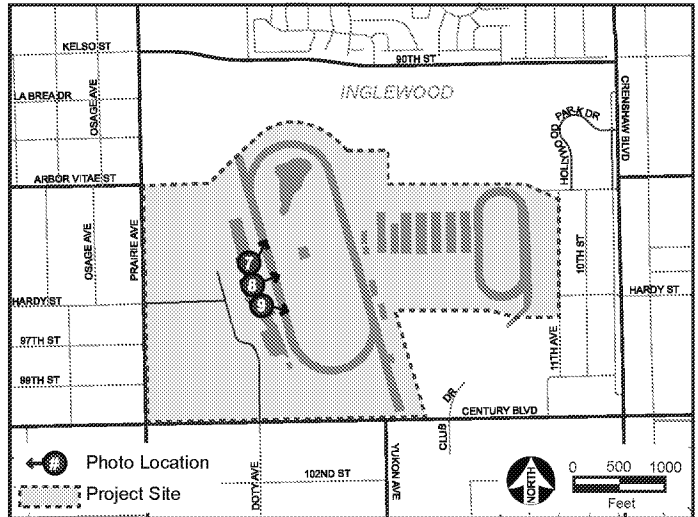
**View 7:** View from Hollywood Park grandstand facing northeast towards the racetrack. One infield lake in the center of the racetrack and surrounding off-site residential uses can be viewed.



**View 8:** View from Hollywood Park grandstand facing east towards the racetrack. One infield lake in the center of the racetrack and surrounding off-site residential uses can be viewed.

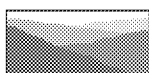


**View 9:** View from Hollywood Park grandstand facing southeast towards the racetrack. An infield lake and surrounding off-site commercial uses can be viewed.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.

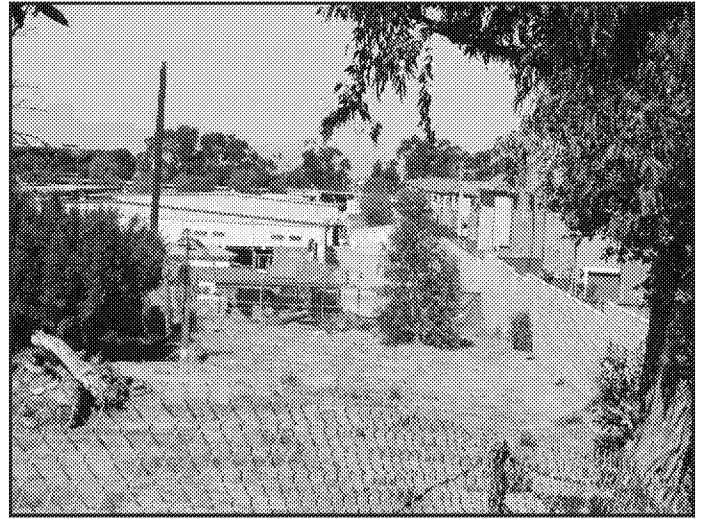


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Figure IV-A-3  
Views of the Project Site  
Views 7, 8 and 9



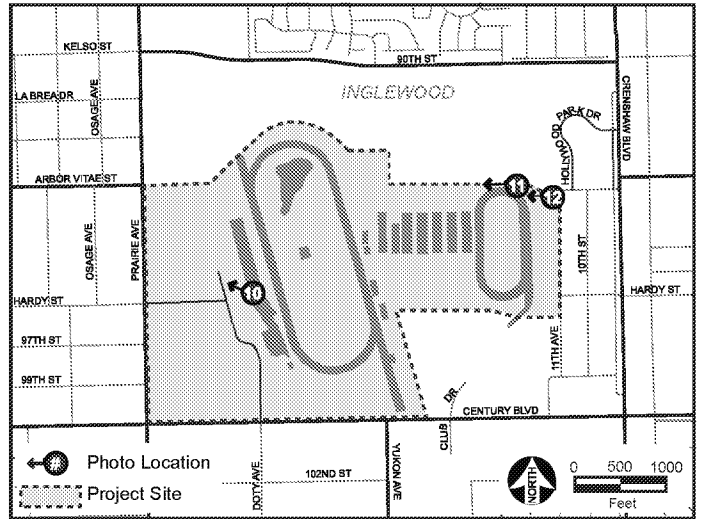
**View 10:** View of horse showing area in front of the main entrance of Hollywood Park.



**View 11:** View from Darby Park of Hollywood Park stable area and adjacent residential neighborhood (right), separated by a masonry block wall.



**View 12:** View from Darby Park of the training track, with views of the Hollywood Park grandstand in the background.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



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Figure IV-A-4  
Views of the Project Site  
Views 10, 11 and 12

to-two story structures, including fast-food restaurants, motels, commercial retail outlets, and small shopping centers. Set back on the south side of Century Boulevard are smaller, quieter streets that have commercial retail, office, and residential uses. Along Century Boulevard across from Doty Avenue is an entrance to Hollywood Park.

#### *Prairie Avenue Corridor*

Prairie Avenue is another major commercial corridor that runs north and south through the City of Inglewood. The Project Site is located on the east side of Prairie Avenue between Century Boulevard and W. 90<sup>th</sup> Street. Uses along Prairie Avenue include several small shopping centers, restaurants, convenience stores, gas stations, commercial retail, and office uses. Several single- and multi-family residential uses are located on Prairie Avenue. Set back on the west side of Prairie Avenue are residential uses, interspersed with religious uses, schools and hospitals. The main entrance to Hollywood Park is located on Prairie Avenue at Hardy Street.

#### *West 90<sup>th</sup> Street Corridor*

West 90<sup>th</sup> Street is located north of the Project Site and runs east and west through the City of Inglewood. An undeveloped surface parking lot and the Renaissance residential development are located along W. 90<sup>th</sup> Street and adjacent to the Project Site. Carlton Way, which extends south from W. 90<sup>th</sup> Street between the undeveloped lot and the Renaissance residential development, provides secondary access to the Project Site. Additionally, W. 90<sup>th</sup> Street provides access to the Forum, located at the Prairie Avenue intersection, its associated surface parking areas, and adjacent residential neighborhoods. The 10-acre Darby Park is located at the intersection of W. 90<sup>th</sup> Street and Crenshaw Boulevard. In general, W. 90<sup>th</sup> Street is quieter and experiences less traffic than Century Boulevard and Prairie Avenue due to lack of commercial development in the area.

#### *Crenshaw Boulevard Corridor*

Crenshaw Boulevard is located to the east of the Project Site and runs north and south through the City of Inglewood. The area is characterized by a mix of residential and commercial development. To the west of Crenshaw Boulevard is a residential neighborhood which lies adjacent to the Project Site and due to topography affords views of the racetrack, grandstand, and the Project Site in general. Darby Park, which is located near the intersection of W. 90<sup>th</sup> Street and Crenshaw Boulevard provides recreational space and views of the Project Site. The area along Crenshaw Boulevard is characterized with more residential uses. A large commercial shopping center, as previously discussed, is located at the intersection of Crenshaw Boulevard and Century Boulevard. Other commercial retail uses are located at the southern end of Crenshaw Boulevard.



### *Scenic Views and Vistas*

A view refers to direct and unobstructed line-of-sight to an on- or off-site aesthetic resource, which may take the form of panoramic viewpoints from particular vantages. The available viewshed or visible landscape within a given field of view is defined by physical elements that occupy a viewer's line-of-sight from a particular location. Existing views may be obstructed or blocked by modification of the environment (e.g., grading, landscaping, building construction, etc.). Conversely, modifications to the existing environment may create or enhance view opportunities.

Under CEQA, only public views need to be considered. Public views are those which can be seen from vantage points which are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views, in contrast, are those which are only available from vantage points located on private property. Unless specifically protected by Ordinance, private views are not protected from developments that occupy airspace directly above a private property. Therefore, private views are not considered to be impacted under CEQA if an adjacent land use blocks such view, especially if the project is within the zoning and design guidelines designated for the site. Nonetheless, for informational purposes it is expected that adjacent residential uses may have concerns regarding potential obstruction of private views.

#### *Off-Site Views of the Project Site*

In general, the average surface topography of the Project Site rises across the property from the southwest parking area (approximately 106 feet above msl) to the northeast stables area (approximately 150 feet above msl).<sup>1</sup> An escarpment extends along the eastern border of the Project Site adjacent to the Training Track, resulting in areas north and east of the Project Site to have raised elevations (for a complete discussion on topography and geology, see Section IV.C Geology). Due to this difference, views looking down onto the Project Site are available from the northeastern areas adjacent to the Site, as depicted in Figure IV.A-4, Views 11 and 12, and Figure IV.A-5, View 13. The residential areas adjacent to the Project Site to the east have limited views of the Project Site, depicted in Figure IV.A-13, Views 38 and 39.

A commercial shopping center located west of the intersection of Crenshaw Boulevard and Century Boulevard is adjacent to the Hollywood Park horse stables (see Figure IV.A-5, View 14) and practice racetrack, which is separated by a concrete wall. The commercial shopping center abuts the southern and eastern borders of the Project Site and has open views of the grandstand and racetrack (Figure IV.A-5, View 15).

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<sup>1</sup> Group Delta Consultants, *Geotechnical Evaluation for Environmental Impact Report, Proposed Residential and Commercial Development, Hollywood Park Redevelopment, Inglewood, California, March 29, 2007* (See Table 5).



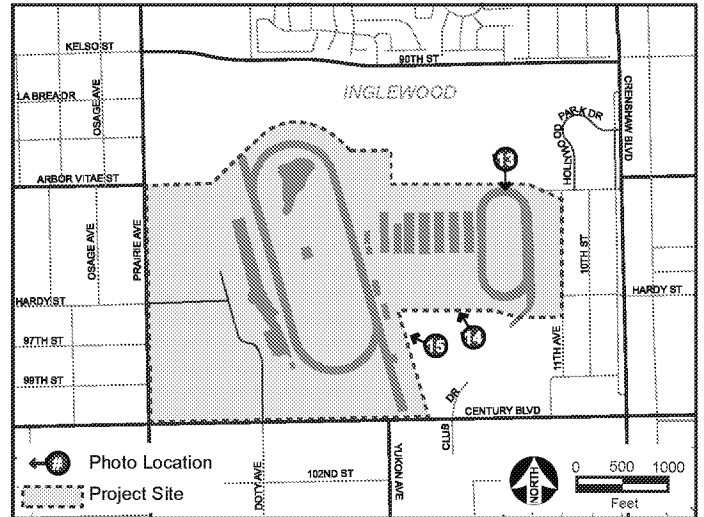
**View 13:** View looking towards the Hollywood Park training track facing south.



**View 14:** View of Hollywood Park Stables and adjacent commercial shopping center.



**View 15:** View looking northwest towards Hollywood Park racetrack from an adjacent commercial shopping center. Views of the grandstand and Casino are provided.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



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Figure IV-A-5  
Views of the Project Site  
Views 13, 14 and 15

### *Off-Site Views of the Surrounding Area*

#### Century Boulevard

Century Boulevard is located immediately south of the Project Site and is characterized as a major commercial corridor that runs east and west through the City of Inglewood. Figure IV.A-6, Views 16 and 17, present representative views along Century Boulevard. As depicted in Figure IV.A-6, View 18, streets adjacent to Century Boulevard are characterized by commercial and residential development. Along Century Boulevard across from Doty Avenue is an entrance to Hollywood Park. A view looking towards the entrance from Doty Avenue is available in Figure IV.A-7, View 19. A view from the Project Site exiting onto Century Boulevard can be seen in Figure IV.A-7, View 20. Additional views north and south along Century Boulevard are depicted in Figure IV.A-7, View 21, and Figure IV.A-8, Views 22-23.

#### Prairie Avenue Corridor

Prairie Avenue is located immediately west of the Project Site and runs north and south through the City of Inglewood. The portion of Prairie Avenue that directly abuts the Project Site is characterized with mostly commercial development fronting the west side with residential uses set back from the street. The Project Site, specifically the Hollywood Park Casino and Grandstand, can be viewed from some of these residential areas. As depicted in Figure IV.A-8, View 24, and Figure IV.A-9, View 26 these views are partially blocked by street and on-site landscaping. Representative views of the Prairie Avenue corridor are depicted in Figure IV.A-9, Views 25 and 27, and Figure IV.A-10, View 28. Residential uses are set back from the commercial uses on Prairie Avenue on most every side street (see Figure IV.A-10, Views 29 and 30). Further north on Prairie Avenue towards W. 90<sup>th</sup> Street, single-family residential uses become more prominent than commercial development, as depicted in Figure IV.A-11, Views 31-33.

#### 90<sup>th</sup> Street

West 90<sup>th</sup> Street is located north of the Project Site and runs east and west through the City of Inglewood. An undeveloped surface parking lot (see Figure IV.A-12, View 34), and residential development (see Figure IV.A-12, Views 35 and 36) are adjacent to W. 90<sup>th</sup> Street and adjacent to the Project Site. Access to the Project Site is available from Carlton Way, adjacent to undeveloped surface parking lot and the Renaissance residential development (Figure IV.A-12, View 36 Figure IV.A-13, View 37).

#### Crenshaw Boulevard Corridor

Crenshaw Boulevard is located to the east of the Project Site and runs north and south through the City of Inglewood. The area is characterized by a mix of residential and commercial development. To the east of Crenshaw Boulevard is a neighborhood which lies adjacent to the Project Site and due to topography affords views of the racetrack, grandstand, and the general area. The residential areas adjacent to the Project Site (Figure IV.A-13, View 38) to the east have limited views of the Project Site, depicted in Figure IV.A-13, View 39.



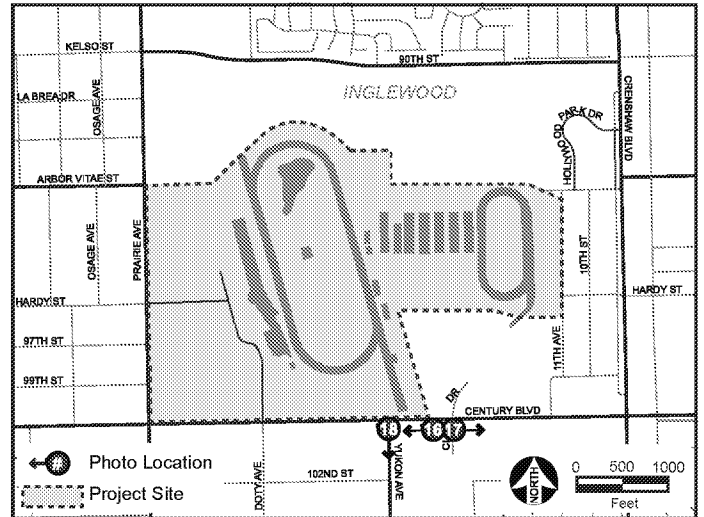
**View 16:** View facing west down Century Boulevard adjacent to the Project Site from a commercial shopping center.



**View 17:** View facing east down Century Boulevard adjacent to the Project Site from a commercial shopping center.



**View 18:** View adjacent to the Project Site on Century Boulevard looking south on Yukon Avenue.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



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Figure IV-A-6  
Views of the Project Site  
Views 16, 17 and 18



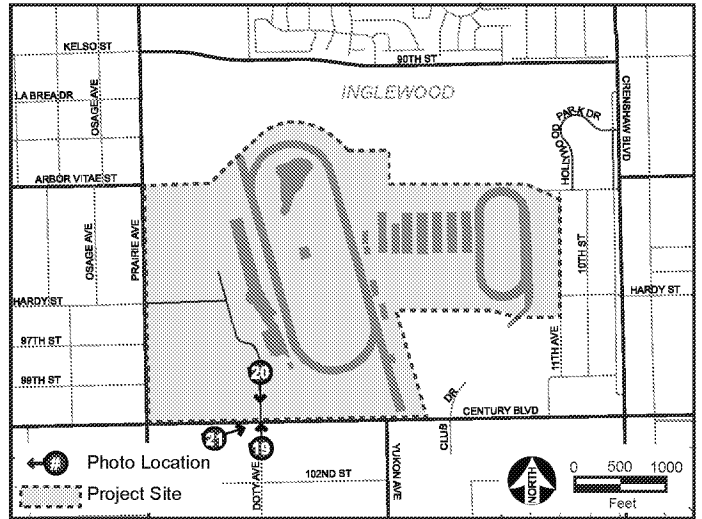
**View 19:** View from Century Boulevard looking north towards Hollywood Park at the Doty Avenue entrance. Views of the casino and grandstand can be seen.



**View 20:** View exiting the Project Site onto Century Boulevard facing south onto Doty Avenue.



**View 21:** View from the south side of Century Boulevard towards the Project Site. The Hollywood Park Casino can be partially viewed on the Project Site, which is located on the north side of Century Boulevard.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



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Figure IV-A-7  
Views of the Project Site  
Views 19, 20 and 21



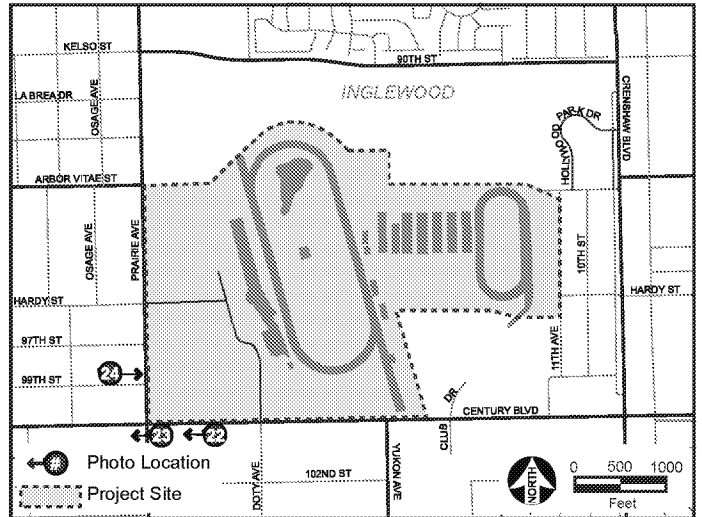
**View 22:** View looking west across Century Boulevard towards Prairie Avenue. Surface parking on the Project Site is located on the north site of Century Boulevard.



**View 23:** View facing west along Century Boulevard towards the Prairie Avenue intersection.



**View 24:** View of residential uses on 99th Street facing Prairie Avenue.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
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Figure IV-A-8  
Views of the Project Site  
Views 22, 23 and 24



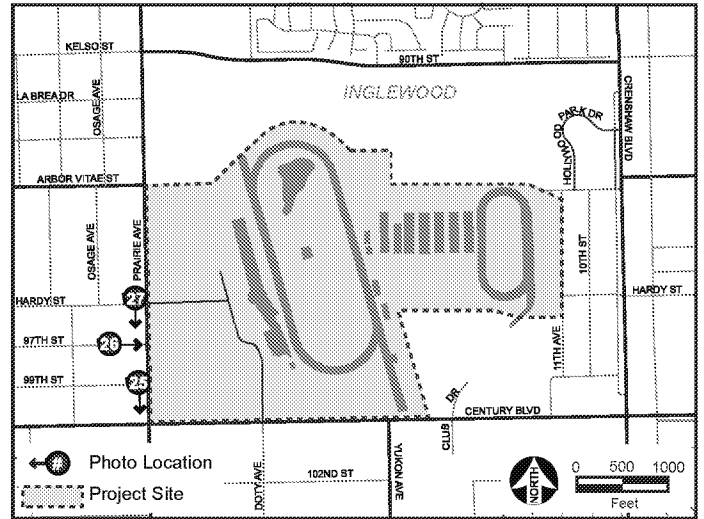
**View 25:** View of the intersection of Prairie Avenue and 99th Street looking south with views of surrounding commercial uses. The Project Site is located on the east (left) side of Prairie Avenue.



**View 26:** View of residential uses on 97th Street facing Prairie Avenue. Limited views of the Project Site can be seen.



**View 27:** View looking south at surrounding commercial uses along Prairie Avenue near the Project Site's main entrance.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



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Figure IV.A-9  
Views of the Project Site  
Views 25, 26 and 27



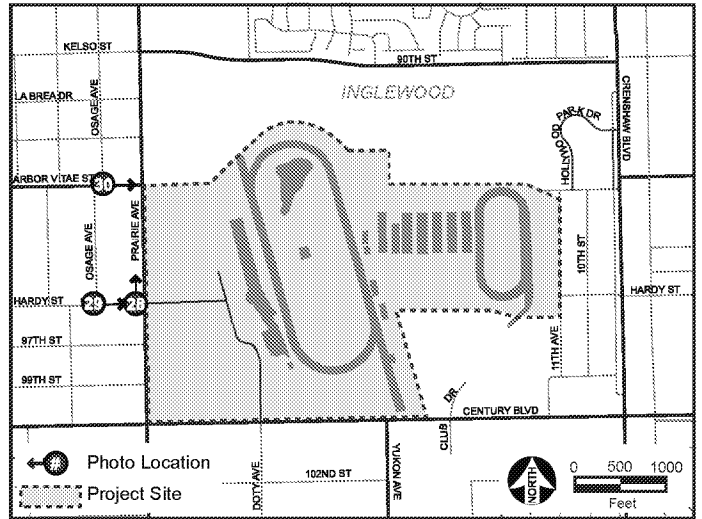
**View 28:** View looking north at surrounding commercial uses along Prairie Avenue near the Project Site's main entrance.



**View 29:** View of residential uses on Hardy Street facing Prairie Avenue. Limited views of the Project Site can be seen.



**View 30:** View of residential uses on Arbor Vitae Street facing Prairie Avenue.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



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Figure IV.A-10  
Views of the Project Site  
Views 28, 29 and 30





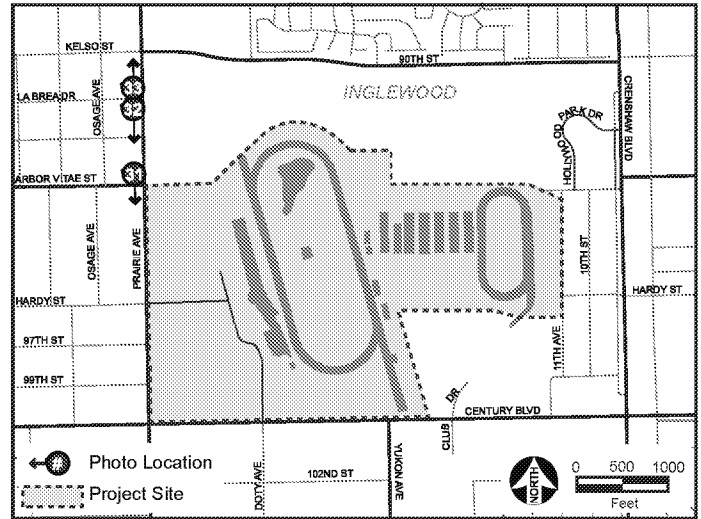
**View 31:** View of the intersection of Prairie Avenue and Arbor Vitae Street looking south with views of surrounding residential and commercial uses. The Project Site is located on the east (left) side of Prairie Avenue.



**View 32:** View of the intersection of Prairie Avenue and La Brea Drive looking south with views of surrounding residential and commercial uses. The Project Site is located on the east (left) side of Prairie Avenue.



**View 33:** View adjacent to the Project Site at the intersection of Prairie Avenue and La Brea Drive looking north with views of surrounding residential uses.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
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Figure IV.A-11  
Views of the Project Site  
Views 31, 32 and 33



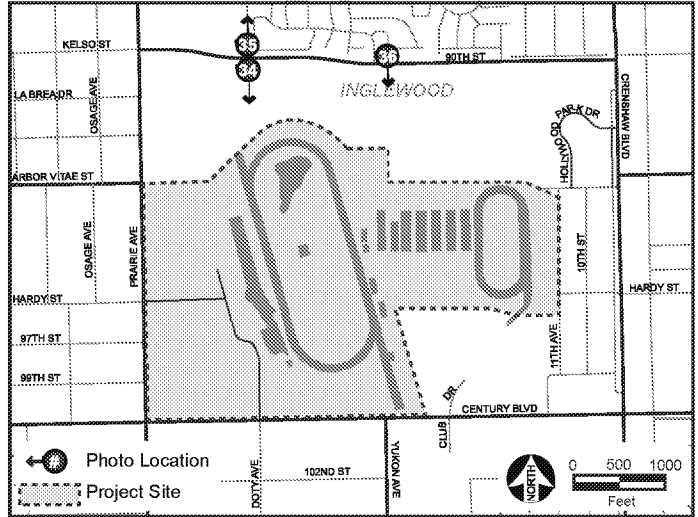
**View 34:** View from the intersection of 90th Street and Kareem Court looking toward the Project Site. Portions of the surface parking located to the east and west are not part of the Project Site.



**View 35:** View from the intersection of 90th Street and Kareem Court looking north towards adjacent residential and commercial uses.



**View 36:** View from the intersection of 90th Street and Carlton Way looking south. The Project Site is located south and adjacent residential uses are located to the east (left).



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

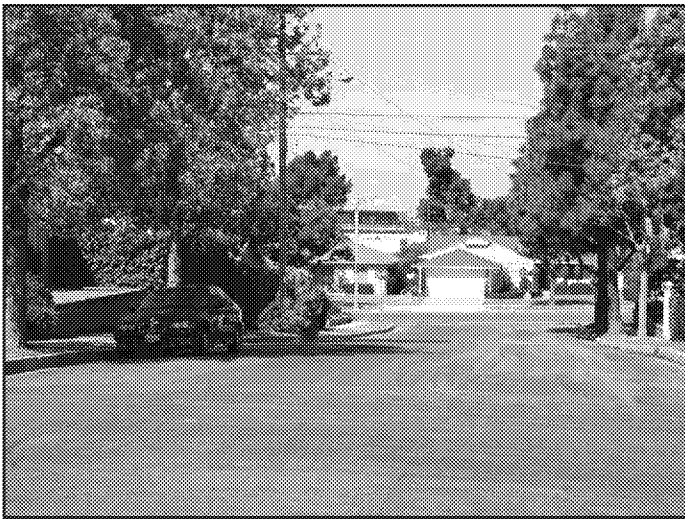
Figure IV.A-12  
Views of the Project Site  
Views 34, 35 and 36



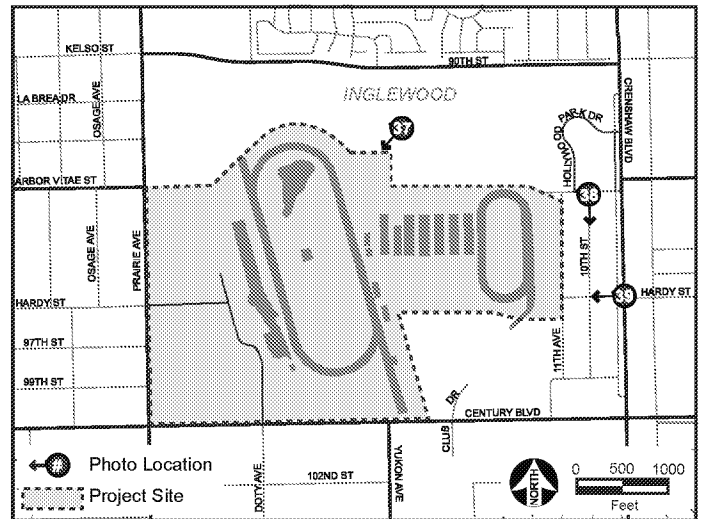
**View 37:** View of the northern entrance of Hollywood Park from Carlton Way. The Project Site is located to the south, and adjacent residential land uses are located to the north and east.



**View 38:** View facing south along 11th Street of surrounding residential uses. The Project Site is located to the west (left) of 11th Street.



**View 39:** View of surrounding residential uses from the intersection of Hardy Street and 10th Street looking west. The Hollywood Park Grandstand can be seen above the residences.



**PHOTO LOCATION MAP**

Source: Christopher A. Joseph & Associates, 2007.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

Figure IV.A-13  
Views of the Project Site  
Views 37, 38 and 39

## Light & Glare

### *Existing Nighttime Lighting*

With respect to nighttime lighting and illumination, the project area provides relatively high levels of ambient lighting, which is generated along the major transportation corridors, such as Century Boulevard and Prairie Avenue, as well as Hollywood Park and the Forum.

Nighttime lighting along the Century Boulevard and Prairie Avenue corridors is generated by street lights, vehicle headlights, and architectural lighting, including illuminated signage, security lighting, and building illumination (i.e., light emanating from the interior of structures through windows) from surrounding commercial and residential uses. The residential areas away from these streets do not generate substantial nighttime lighting, though they do provide some street lighting and receive lighting from passing automobiles. Security lighting, architectural lighting, and building illumination emanate from the Forum, which causes additional night lighting during evening events.

The existing Hollywood Park Racetrack and Casino generates a moderate to high degree of nighttime lighting from vehicle headlights, architectural lighting, illuminated signage, building illumination, and security lighting. During the racing seasons, which are generally scheduled from April to July (summer season) and November to December (autumn season), additional racetrack lighting is used for nighttime events. The Main Track is illuminated with approximately 29 light poles that stand between 60 to 70 feet high above grade. Each pole is equipped with 30 1,000-watt metal halide fixtures (4,160V – 480V). The surface parking lot area is illuminated with approximately 29 100-foot tall light poles with 12 1,000 metal halide fixtures (4160V-480V) per pole. In addition the interior grandstand and pavilion areas are illuminated with over 339 1,000- to 1,500-watt metal halide fixtures (480V). Perimeter landscaping partially obstructs direct views of the Project Site; however, because many of the existing facilities are not concealed due to their mass and scale, emanating light does trespass onto adjacent land uses.

### *Existing Glare*

Glare is a common phenomenon in the southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which result in a large concentration of potentially reflective surfaces. Excessive glare not only restricts visibility but increases the ambient heat reflectivity in a given area. Most glare in the project area is generated by reflective materials on the surrounding buildings and glare from vehicles passing on the surrounding major streets (i.e., Century Boulevard and Prairie Avenue). The Project Site itself generates a moderate to high amount of glare due to the relatively large expanse of existing surface parking lots that occupy the Project Site.

### *Light and Glare Sensitive Receptors*

Residential areas generally surround the Project Site to the north, south, east and west. Residential neighborhoods are immediately adjacent to the Project Site to the west set back from Prairie Avenue, to the east bordering Crenshaw Boulevard, and to the south set back from Century Boulevard. The northern border of the Project Site is generally bounded by an undeveloped surface parking lot which is adjacent to W. 90<sup>th</sup> Street. Residential uses are located to the north of W. 90<sup>th</sup> Street and experience light and glare impacts from the existing uses on the Project Site.

Other light and glare sensitive uses within 0.5 mile of the Project Site area include Holy Trinity Church (9300 Crenshaw Blvd.), Westside Bible Church (9619 11<sup>th</sup> Ave.), Western Congregation Church (3223 Century Blvd.), Greater New Bethel Baptist Church (601 99<sup>th</sup> St.), Kelso Elementary School (809 E. Kelso St.), and Centinela Hospital (555 E. Hardy Ave.). With the exception of Centinela Hospital, most of the uses operate during the daylight hours and are not substantially impacted by existing light from the Project Site. None of the other uses are immediately adjacent to the Project Site and thus are not currently impacted by glare from the Project Site.

## **ENVIRONMENTAL IMPACTS**

### **Methodology**

This section evaluates the potential impacts of the Proposed Project on aesthetics, views and vistas, and light and glare in the project area. Aesthetics generally refers to visual resources and the quality of what can be seen, or overall visual perception of the environment, and may include such characteristics as building height and mass, development density, architectural design, building condition (i.e., blight), ambient lighting and illumination, landscaping and open space. Views refer to visual access and obstruction of prominent visual features, including both specific visual landmarks and panoramic vistas. Lighting issues address the effects of nighttime illumination and daytime glare on adjacent land uses. For purposes of this analysis, representative photographs of the Project Site and surrounding area were taken by CAJA staff in April 2007.

For purposes of this analysis, shade and shadow impacts are generally considered significant if the Proposed Project creates substantial shade/shadows that affect shadow sensitive uses (e.g., residential uses or outdoor spaces associated with residential or recreational uses or existing solar panels) for more than 3 hours between 9:00 a.m. and 3:00 p.m. from late October to early April or for more than 4 hours between 9:00 a.m. and 5:00 p.m. from early April to late October. Due to the proposed Project's location in Southern California, the majority of shadows cast by the Project throughout the day would be to the west, north and east of the Project Site.

### **Thresholds of Significance**

To determine whether a proposed project would have a significant impact to aesthetics, Appendix G to the State CEQA Guidelines questions whether a project would:

- a) Have a substantial adverse effect on a scenic vista;
- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- c) Substantially degrade the existing visual character or quality of the site and its surroundings; or
- d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

### **Impacts Determined to be Less Than Significant**

As determined in the Initial Study analysis, there are no scenic vistas (panoramic views) afforded within the Proposed Project vicinity. In addition, there are no tall or topographic features of the Project Site (focal views), which may be viewed, or which make up part of the scenic landscape of the surrounding community. Therefore, threshold questions (a) and (b) do not apply to this analysis and no further discussion is warranted.

### **Project Impacts**

The visual impacts that the Proposed Project would have on the visual character of the community are discussed below.

#### *Views and Urban Design*

The Proposed Project would implement the goals and objectives identified in the Merged Redevelopment Plan by redeveloping the Project Site with a high quality modern mixed-use development which would be consistent with the surrounding uses within the community. There are no designated scenic highways nor natural elements or unique scenic resources within the City of Inglewood. As such, impacts to scenic views and vistas would be less than significant.

Furthermore, views from the Proposed Project into adjacent residential land uses would be buffered by a 15' landscape buffer between adjacent properties. Broad leaf, evergreen screen of columnar tree species spaced 25' on center (at maturity, trees will be 40' to 50' in height) would provide shade and privacy, offering a more comfortable atmosphere for residents on either side of the property line.

As discussed previously in this Section, under CEQA, private views are not considered to be impacted under CEQA if an adjacent land use blocks such view, especially if the project is within the zoning and design guidelines designated for the site.

### *Impacts to Light and Glare*

The Proposed Project would include the development of a mixed-use master planned development. Outdoor lighting fixtures, illumination from interior spaces, lighting for signage, and vehicle headlights all have the potential to generate potentially significant light and glare impacts upon adjacent commercial and residential land uses. Lighting throughout the Project Site would be consistent with the proposed land use patterns and directed in a way that would minimize impacts to the residential areas proposed to be developed and to the surrounding off-site residential areas. Light and glare impacts emanating from the proposed parking structures in the mixed-use land use areas would be avoided through the Hollywood Park Specific Plan Plot Plan Review process and the implementation of design criteria to specific buildings contained therein. All parking structures would be required to incorporate shielding elements and orient entry and exit driveways to avoid light and glare trespass onto adjacent areas within the Project Site that are designated for residential land uses. (See Mitigation Measure A-1 and Project Design Features (PDFs) A-1 through A-5, below). Low-level security lighting would be installed, where appropriate, to deter criminal activity from the Project Site. (See Section IV.K.1, Police Services.) The majority of lighting associated with the Proposed Project would be directed towards the interior of the Project Site and directed away from the neighboring land uses. The proposed buildings would incorporate a variety of materials that would minimize the transmission of light from the building interiors. Overall, building materials used would not cause excessive glare that is visually inconsistent with surrounding land uses, or result in a substantial increase in glare that would affect nearby sensitive uses.

As discussed previously, ambient nighttime lighting on the Project Site and in the project vicinity is generated by sources that include streetlights, architectural and security lighting, automobile headlights on streets and in parking lots, and indoor building illumination from the on-site uses and surrounding commercial structures. It is anticipated that light and glare from the Proposed Project would be substantially less intrusive than the lighting impacts generated by the existing uses on the Project Site. As such, light and glare impacts would be net beneficial.

### *Landscape and Open Space Elements*

The Proposed Project would introduce new green space elements throughout the Project Site. In total, approximately 25 acres of open spaces areas would be introduced by the Proposed Project as park and recreational space. Landscaped areas would be provided throughout the Project Site to further create a unique new community within the City. The 25 acres of open space would be provided for residents and employees of the Project Site, as well as the entire Inglewood community which is in need of new park space (see Section IV.K.4, Parks and Recreation, for a complete discussion). As a result, the proposed

open space would be an attractive visual attribute to the Proposed Project resulting in a net beneficial aesthetic impact.

### ***Project Signage and Illumination***

Signs and graphics will play a large role in creating and reinforcing the desired neighborhood feel of the various public spaces, shopping, entertainment, casino/gaming and civic uses. One of the objectives of the Merged Redevelopment Plan under the provision on design guidelines is to create an attractive and pleasant environment in the Merged Project Area. As a result, plans should give consideration to good design and other amenities to enhance the aesthetic and architectural quality of the affected constituent project area. The proposed Specific Plan includes an established signage program to achieve a unified and cohesive overall appearance, which furthers the goals of the Merged Redevelopment Plan with respect to design guidelines for signage. Controlled way-finding and identity signage is a major factor in creating and preserving the design character of the project. The proposed signage requirements will include regulations to permit the following types of signage within the plan area: (a) project or development identification signs (marquee project identity signs); (b) building identification and tenant signs (anchor signage); (c) directional and service signs; (d) advertising signs and wall graphics; (e) temporary signs; (f) building address signs; and (g) regulatory signs.

Project signage has the potential to result in visual blight and cluttering of the urban environment if signage is not designed and implemented in a uniform and cohesive manner taking into account the surrounding built environment. As such, the proposed Specific Plan includes a comprehensive set of development standards and design guidelines for signage that establish requirements and guidelines for the placement, style, size and location of project signage, to be implemented through the Plot Plan Review process. The proposed signage will incorporate general signage guidelines such as Project Design Features (PDFs) (see PDFs A-4 through A-11, below). Compliance with the proposed signage development standards and design guidelines will ensure that signage is implemented in a manner that furthers the design goals of the Merged Redevelopment Plan, and will ensure that visual impacts associated with the Project's signage are reduced to less than significant levels.

### ***Shade and Shadow Impacts***

The Proposed Project would incorporate a variety of building types generally ranging from 25 to 60 feet above finished grade, not including architectural features and roof signage. The hotel structure located on an approximate 2.5-acre parcel on Century Boulevard would be the highest structure within the proposed development at approximately 150 feet. The Preliminary Height Limits Map is illustrated in Figure II-5 in Section II, Project Description.

Shade and shadow impacts from the proposed hotel structure would not significantly impact any existing land uses in the project vicinity. Assuming a maximum height of 150 feet, the maximum possible shadow lengths resulting from the proposed Hotel structure would occur during the winter months and would extend approximately 421 feet to the west at 9:00 a.m. and 485 feet to the east at 3:00 p.m. During the



noon hour, the resulting shadow length would decrease to a maximum of 235 feet oriented in a northerly direction. No shadows would be oriented to the south. As a result of its location along the southern most portion of the Project Site, it is evident that this structure would not cast shadows upon adjacent land uses for more than 3 hours during the winter months.

The maximum shadow lengths resulting from the proposed residential and mixed-use retail product types would extend approximately 180 feet to the west and east, at 9:00 a.m. and 3:00 p.m., respectively, assuming a maximum building height of 60 feet above grade. During the noon hour, the resulting shadow length would reach a maximum of 96 feet oriented in a northern direction. No shadows would be oriented to the south. During the 9:00 a.m. hour, shadows would fall to the west. Because the Project Site is bordered on the west by Prairie Avenue, which provides an approximate 100 foot buffer between the project site and any adjacent land uses, structures up to 60 feet high would not result in significant shade and shadow impacts to any off site properties along Prairie Avenue. Because of the topographical difference in grade that separates the residential land uses to the north from the project site, the project's northerly (noon-time) shadow impacts would be shorter than 96 feet and are anticipated to fall within standard building setbacks for the proposed lots. In addition, because the Proposed Project incorporates an approximate minimum 100 foot setback from the eastern edge of Bluff Park (see Section IV.C, Geology and Soils), the Proposed Project's structures would not impact any of the adjacent residential properties to the east of the Project Site. Therefore, it is evident that none of the proposed project's structures would cast shadows upon adjacent land uses for more than 3 hours during the winter months and the project's shade and shadow impacts would be less than significant.

While the Proposed Project would not significantly impact any existing land uses in the project vicinity, shade and shadow patterns from the hotel structure would cast shadows upon future residential land uses that are proposed to be located directly north of the Mixed-Use Zone parcel where the hotel would be located, as designated on the proposed Hollywood Park Specific Plan Land Use Plan (see Figure II-4 in Section II, Project Description). Residential uses located within a 485 foot radius of the Hotel Parcel would be potentially affected by shade and shadows created by the hotel structure during the winter solstice. During the summer solstice, shadows from the hotel structure would have the potential to affect residential zoned properties to the north that are within a 77 foot radius of the Hotel Parcel in the Mixed-Use Zone. The extent of shading during the winter and summer months in terms of area and duration would be affected by the size of the hotel building footprint and the precise location of the hotel on the Hotel Parcel within the Mixed-Use Zone, which is not known at this time. However, for purposes of assessing impacts upon proposed future uses, such as the adjacent residential land use zone, shade and shadow impacts were evaluated in the context of solar access and compliance with Title 24 Energy Standards. As set forth in the Specific Plan, the location and placement of the hotel structure and the residential uses would be in accordance with the Land Use Plan and in compliance with the minimum building setbacks and building height standards set forth in the development standards of the Specific Plan. As shown in the Specific Plan, Minimum Building Setbacks are proposed to require a 10 foot building setback on the north and south sides of the border between the Mixed-Use Zone that the Hotel Parcel is located within and the adjacent Residential Land Uses Zone. This results in a 20 foot buffer that

would provide for indirect solar access. Therefore, shade and shadow impacts from the hotel upon proposed residential land uses adjacent to the hotel would be less than significant.

### **Land Use Equivalency Program**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site, and within the proposed land use areas as show on Figure II-4, Proposed Preliminary Land Use Plan. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's Circulation Plan, building pad elevations, height limits, or setback requirements. Any additional retail, residential, office/commercial, and/or hotel development would be similar in appearance and character to the rest of the development program.

All Project Design Features (PDFs) and/or recommended mitigation measures to minimize visual quality impacts under the Proposed Project would be implemented, as appropriate, under the Equivalency Program. Therefore, development under all of the Equivalency Scenarios would have a visual character that is similar to that of the Proposed Project and would be consistent with the visual quality regulations that are applicable to the Proposed Project Site, and as with the Proposed Project, would not result in significant impacts to view and urban design.

With respect to light and glare impacts, the Proposed Project and the Equivalency Program would increase nighttime lighting and daytime glare. Similar to the Proposed Project, the Equivalency Program development would comply with Code-required lighting measures and incorporate mitigation measures that would reduce light and glare impacts. Therefore, development under all of the Equivalency Scenarios would not contribute to considerable significant impacts with respect to light and glare.

With respect to shade and shadow impacts, the Proposed Project and the Equivalency Program would not result in any significant shade and shadow impacts to adjacent land uses due to the location of the land uses. Since the height limits under the Equivalency Program are identical to the Proposed Project, impacts associated with shade and shadow would be comparable to those analyzed for the Proposed Project. As such, development under all of the Equivalency Scenarios would be less than significant with respect to shade and shadow impacts.

### **CUMULATIVE IMPACTS**

Cumulative aesthetic impacts could occur if other related projects in the vicinity of the Proposed Project Site would result in the degradation of the project area or the introduction of substantial light or glare in conjunction with the impacts of the Proposed Project. A total of 39 related projects have been identified within the City of Inglewood.

### **Views and Urban Design Impacts**

On a cumulative basis, the Proposed Project, the 39 Related Projects, plus background growth would stimulate the existing visual character within the City of Inglewood by revitalizing the area with new and infill development. Furthermore, the goals of the Merged Redevelopment Plan Area within the City of Inglewood encourage new development to reduce blight and better utilize the City's resources to contribute to a better quality of life and promote the City's image. The Proposed Project, including the Equivalency Program, and Related Projects would further these goals such that no cumulatively significant impact would occur.

### **Light and Glare Impacts**

With respect to light and glare impacts, the Proposed Project, including the Equivalency Program, in combination with the related projects and development in the area, would increase nighttime lighting and daytime glare. Similar to the Proposed Project, related projects would be expected to comply with Code-required lighting measures and to incorporate mitigation measures that would reduce light and glare impacts to the greatest extent feasible. As the related projects discussed generally involve residential, commercial and office development, they would be expected to be consistent and compatible with any surrounding residential sensitive receptors with respect to light and glare impacts and sensitivity. As such, the Proposed Project would not contribute to a substantial increase in light or glare and no cumulatively significant impact would occur.

Overall, the cumulative development underway in the vicinity of the Project Site would positively affect the urban redevelopment and revitalization of the project area. The Proposed Project would not contribute to a cumulatively considerable significant impact with respect to light and glare as it would further the revitalization efforts within the City, and cumulative impacts would be less than significant.

### **Shade and Shadow Impacts**

The Proposed Project, including the Equivalency Program, would not result in any significant shade and shadow impacts to adjacent land uses. In addition, based on a review of the related projects listed in Section III, Environmental Setting, none of the related projects are located such that their shadow impacts would effect the Proposed Project or shade off site sensitive uses in a manner that, when combined with the shade and shadow impacts of the Proposed Project, would increase the severity of shade and shadow patterns in the project vicinity. Therefore the Proposed Project's shade and shadow impact would not contribute to a cumulative shade and shadow impact.

## **PROJECT DESIGN FEATURES**

The following PDFs are proposed to be incorporated into the project description and were used to formulate portions of the environmental analysis with respect to aesthetic impacts, including views and

urban design, light and glare, and shade and shadow impacts. As such, it is recommended that the lead agency incorporate the following project design features as conditions of project approval.

PDF A-1. Public right-of-way landscape plans shall be prepared by a licensed architect for each phase of the project as provided for in the Specific Plan, and shall be implemented as part of the Project.

PDF A-2. The applicant shall obtain Planning Division approval of plot plans, including: final site plans, landscape plans and architectural drawings, as provided for in the Specific Plan, prior to the completion of working drawings and subsequent issuance of a building permit.

PDF A-3. The Proposed project shall be developed in conformance with the Preliminary Building Height Limit Map as adopted in conjunction with the approval of the Specific Plan.

PDF A-4. Signage shall be in conformance with the development standards and design guidelines as provided for in the Specific Plan. Some specific measures include:

- All garage parking areas shall be identified.
- Sign conduits, transformers, junction boxes, etc., must be concealed from view.
- Signs should be clearly legible for universal accessibility. They should meet or exceed ADA standards for type size, type style, color contrast, messaging and heights.
- Typefaces used on identity signs should be easy-to-read fonts. Consideration must be given to colors and materials of the surrounding support walls.
- Freestanding identity signs or development markers should be sited to maintain sight lines at entries and major circulation routes.

PDF A-5. All parking structures within the mixed-use land use areas shall incorporate architectural or site plan design features to shield or avoid light and glare trespass onto adjacent residential properties.

## MITIGATION MEASURES

The following mitigation measures are recommended to reduce the Proposed Project's impacts with respect to light and glare:

MM A-1. The Proposed Project shall incorporate low-level directional lighting at the ground, podium, and parking levels of all structures to ensure that architectural, parking and

security lighting does not spill onto adjacent residential properties. Compliance with this measure shall be demonstrated at Plot Plan Review approval for each building permit.

MM A-2. The proposed park and open space areas shall incorporate low-level directional lighting for pedestrian safety and security purposes in a manner that minimizes light trespass onto adjacent properties to the maximum extent feasible. Compliance with this measure shall be demonstrated at Plot Plan review for development of the open space and park areas.

MM A-3. The Proposed Project's façades and windows shall be constructed of non-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

As discussed above, threshold questions (a) and (b) do not apply to this analysis and no further discussion is warranted.

With respect to threshold question (c), the Proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings. Implementation of the PDFs identified above would ensure that the proposed project is designed and developed in a manner that results in a positive aesthetic impact within the project and/or the surrounding environs.

With respect to threshold question (d), the Proposed Project's potential to create a new source of substantial light or glare which would adversely affect day or nighttime views in the area would be mitigated to a less than significant impact through implementation of Mitigation Measures A-1 through A-3 above.

The Proposed Project's impacts to aesthetics, including views and urban design, light and glare, and shade and shadow, would therefore be less than significant after mitigation.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### B. AIR QUALITY

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The following analysis of air quality impacts is based on the Air Quality and Noise Technical Report prepared by Terry A. Hayes Associates LLC (TAHA), dated August 21, 2008. This report is included in its entirety as Appendix B of this Draft EIR.

This section examines the degree to which the Proposed Project, including the proposed Equivalency Program, may result in significant adverse changes to air quality. Both short-term construction emissions occurring from activities, such as site grading and haul truck trips, and long-term effects related to the ongoing operation of the proposed project are discussed in this section. The analysis contained herein focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. “Emissions” refer to the quantity of pollutant released into the air, measured in ppd. “Concentrations” refer to the amount of pollutant material per volumetric unit of air, measured in parts per million (ppm) or micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ).

#### EXISTING CONDITIONS

##### Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include: CO, ozone ( $\text{O}_3$ ),  $\text{NO}_2$ , sulfur dioxide ( $\text{SO}_2$ ),  $\text{PM}_{2.5}$ ,  $\text{PM}_{10}$ , and lead (Pb). These pollutants are discussed below.

##### *Carbon Monoxide*

CO is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas such as the project location, automobile exhaust accounts for the majority of CO emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.<sup>1</sup> The highest levels of CO typically occur during the

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<sup>1</sup> *Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

colder months of the year when inversion conditions are more frequent. In terms of health, CO competes with oxygen, often replacing it in the blood, thus reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can be dizziness, fatigue, and impairment of central nervous system functions.

### *Ozone*

O<sub>3</sub> is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG), which includes VOC, and NO<sub>x</sub> react in the presence of ultraviolet sunlight. O<sub>3</sub> is not a primary pollutant; it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO<sub>x</sub>, the components of O<sub>3</sub>, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O<sub>3</sub> formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposures (lasting for a few hours) to O<sub>3</sub> at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

### *Nitrogen Dioxide*

NO<sub>2</sub>, like O<sub>3</sub>, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO<sub>2</sub> are collectively referred to as NO<sub>x</sub> and are major contributors to O<sub>3</sub> formation. NO<sub>2</sub> also contributes to the formation of PM<sub>10</sub>. High concentrations of NO<sub>2</sub> can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO<sub>2</sub> and chronic pulmonary fibrosis. Some increase in bronchitis in children (two and three years old) has also been observed at concentrations below 0.3 ppm.

### *Sulfur Dioxide*

SO<sub>2</sub> is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO<sub>2</sub> are coal and oil used in power plants and industries. Generally, the highest levels of SO<sub>2</sub> are found near large industrial complexes. In recent years, SO<sub>2</sub> concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO<sub>2</sub> and limits on the sulfur content of fuels. SO<sub>2</sub> is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO<sub>2</sub> can also yellow plant leaves and erode iron and steel.

### *Particulate Matter*

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. PM<sub>2.5</sub> and PM<sub>10</sub> represent fractions of particulate matter. Fine particulate matter, or PM<sub>2.5</sub>, is roughly 1/28 the diameter of a human

hair.  $PM_{2.5}$  result from fuel combustion (e.g. motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition,  $PM_{2.5}$  can be formed in the atmosphere from gases such as  $SO_2$ ,  $NO_x$ , and VOC. Inhalable particulate matter, or  $PM_{10}$ , is about 1/7 the thickness of a human hair. Major sources of  $PM_{10}$  include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning, industrial sources, windblown dust from open lands; and atmospheric chemical and photochemical reactions.

$PM_{2.5}$  and  $PM_{10}$  pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract.  $PM_{2.5}$  and  $PM_{10}$  can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas  $PM_{10}$  tends to collect in the upper portion of the respiratory system,  $PM_{2.5}$  is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

### ***Lead***

Pb in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline, the manufacturers of batteries, paint, ink, ceramics, and ammunition and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emission sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance including intelligence quotient performance, psychomotor performance, reaction time, and growth.

### **Regulatory Setting**

The Federal Clean Air Act (CAA) governs air quality in the United States. In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). At the federal level, CAA is administered by the United States Environmental Protection Agency (USEPA). In California, the CCAA is administered by the California Air Resources Board (CARB) at the State level and by the air quality management districts and air pollution control districts at the regional and local levels.



### ***United States Environmental Protection Agency***

USEPA is responsible for enforcing the federal CAA. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB.

### ***California Air Resources Board***

In California, CARB, which became part of the California Environmental Protection Agency (CalEPA) in 1991, is responsible for meeting the State requirements of the federal CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles. CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective on March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county levels.

### ***South Coast Air Quality Management District***

The South Coast Air Quality Management District (SCAQMD) monitors air quality within the project area. SCAQMD has jurisdiction over an area of approximately 10,743 square miles, consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The 1977 Lewis Air Quality Management Act created SCAQMD to coordinate air quality planning efforts throughout southern California. This Act merged four county air pollution control agencies into one regional district to better address the issue of improving air quality in Southern California. Under the Act, renamed the Lewis-Presley Air Quality Management Act in 1988, SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (Basin). Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. Programs that were developed include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The Basin is a subregion of the SCAQMD and covers an area of 6,745 square miles. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The Basin is bounded by Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south (Figure IV.B-1).

### *National and California Ambient Air Quality Standards*

As required by the federal CAA, NAAQS have been established for seven major air pollutants: CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and Pb. The CAA requires USEPA to designate areas as either attainment or non-attainment for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in Table IV.B-1 on page IV.B-7. The USEPA has classified the Basin as nonattainment for O<sub>3</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>.

As discussed above, the CAAQS are generally more stringent than the corresponding federal standards (NAAQS) and, as such, are used as the comparative standard in the air quality analysis contained in this report. The State standards are summarized in Table IV.B-1.

### *Attainment Status*

The CCAA requires CARB to designate areas within California as either attainment or non-attainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as non-attainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as non-attainment. Under the CCAA, the Los Angeles County portion of the Basin is designated as a non-attainment area for O<sub>3</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>.<sup>2</sup>

### *Air Quality Management Plan*



All areas designated as non-attainment under the CCAA are required to prepare plans showing how the area would meet the State air quality standards by its attainment dates. The Air Quality Management Plan (AQMP) is the region's plan for improving air quality in the region. It addresses CAA and CCAA requirements and demonstrates attainment with State and federal ambient air quality standards. The AQMP is prepared by SCAQMD and the Southern California Association of Governments (SCAG). The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards by their applicable deadlines. Environmental review of individual projects within the Basin must demonstrate that daily construction and operational emissions thresholds, as established by the SCAQMD, would not be exceeded. The environmental review must also demonstrate that individual projects would not increase the number or severity of existing air quality violations.

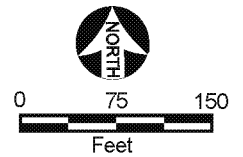
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<sup>2</sup> CARB, <http://www.arb.ca.gov/desig/adm/adm.htm>, accessed May 29, 2007.



**Legend**

-  South Coast Air Basin
-  State of California



Source: TAHA, 2007 and California Air Resources Board, State and Local Air Monitoring Network Plan, October 1998.

**Table IV.B-1  
State and National Ambient Air Quality Standards**

Pollutant	Averaging Period	California Standards (concentration)	Federal Standard (concentration)	
			Primary	Secondary
Ozone (O <sub>3</sub> )	1 hour	0.09 ppm	--	Same as Primary Standards
	8 hour	0.070 ppm	0.075 ppm	
Respirable Particulate Matter (PM <sub>10</sub> )	24 hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	Same as Primary Standards
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	--	
Fine Particulate Matter (PM <sub>2.5</sub> )	24 hour	--	35 µg/m <sup>3</sup>	Same as Primary Standards
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>	
Carbon Monoxide (CO)	8 hour	9.0 ppm	9 ppm	None
	1 hour	20 ppm	35 ppm	
Nitrogen Dioxide (NO <sub>2</sub> )	Annual Arithmetic Mean	--	0.053 ppm	Same as Primary Standards
	1 hour	0.18 ppm	--	
Sulfur Dioxide (SO <sub>2</sub> )	Annual Arithmetic Mean	--	0.03 ppm	--
	24 hour	0.04 ppm	0.14 ppm	--
	3 hour	--	--	0.5 ppm
	1 hour	0.25 ppm	--	--
Lead	30 day average	1.5 µg/m <sup>3</sup>	--	--
	Calendar Quarter	--	1.5 µg/m <sup>3</sup>	Same as Primary Standards

*Source: CARB, Ambient Air Quality Standards, April 1, 2008.*

The 2007 AQMP was adopted by the SCAQMD on June 1, 2007. The 2007 AQMP proposes attainment demonstration of the federal PM<sub>2.5</sub> standards through a more focused control of SO<sub>x</sub>, directly-emitted PM<sub>2.5</sub>, and NO<sub>x</sub> supplemented with VOC by 2015. The eight-hour ozone control strategy builds upon the PM<sub>2.5</sub> strategy, augmented with additional NO<sub>x</sub> and VOC reductions to meet the standard by 2024. The 2007 AQMP also addresses several federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new

meteorological episodes, and new air quality modeling tools. The 2007 AQMP is consistent with and builds upon the approaches taken in the 2003 AQMP. However, the 2007 AQMP highlights the significant amount of reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the time frames allowed under the CAA.

### **Global Warming**

Global climate change refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns, precipitation and storms. Global temperatures are moderated by naturally occurring atmospheric gases, including water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O). These gases allow solar radiation (sunlight) into the Earth's atmosphere, but prevent radiative heat from escaping, thus warming the Earth's atmosphere.

Global climate change attributable to human emissions of greenhouse gases ("GHG") (mainly CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O) is currently one of the most important and widely debated scientific, economic and political issues in the United States. Historical records indicate that global climate changes have occurred in the past due to natural phenomena (such as during previous ice ages). Some data indicate that the current global conditions differ from past climate changes in rate and magnitude. There continues to be significant scientific uncertainty concerning the extent to which increased concentrations of GHGs have caused or will cause climate change, and over the appropriate actions to limit and/or respond to climate change.

Carbon dioxide is the most abundant GHG. GHGs are the result of both natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. According to the California Energy Commission (CEC), emissions from fossil fuel consumption represent approximately 81 percent of GHG emissions and transportation creates 41 percent of GHG emissions in California.<sup>3</sup>

Our understanding of the fundamental processes responsible for global climate change has improved over the past decade, and our predictive capabilities are advancing. However, there remain significant scientific uncertainties, for example, in predictions of local effects of climate change, occurrence of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the complexity of the Earth's climate system, the uncertainty surrounding climate change may never be completely eliminated. Because of these uncertainties, there continues to be significant debate as to the extent to which increased concentrations of GHGs have caused or will cause climate change, and with respect to the appropriate actions to limit and/or respond to climate change. In addition, it is impossible to link a single development project with future specific climate change impacts.

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<sup>3</sup> <http://www.energy.ca.gov/2006publications/CEC-600-2006-013/CEC-600-2006-013-SF.PDF>

### *Regulatory Setting*

In response to growing scientific and political concern regarding global climate change, California has recently adopted a series of laws to reduce both the level of GHGs in the atmosphere and to reduce emissions of GHGs from commercial and private activities within the State. In September 2002, Governor Gray Davis signed Assembly Bill (AB) 1493, requiring the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. However, setting emission standards on automobiles is solely the responsibility of the USEPA. The CAA allows States to set state-specific emission standards on automobiles if they first obtain a waiver from the USEPA. The USEPA has denied California’s request for a waiver, and California is in the process of legally challenging USEPA’s decision, thereby possibly delaying CARB’s proposed implementation schedule.

There has also been activity at the federal level with respect to the regulation of GHGs. In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), argued November 29, 2006 and decided April 2, 2007, the U.S. Supreme Court held that not only did the USEPA have authority to regulate greenhouse gases, but that the USEPA’s reasons for not regulating this area did not fit the statutory requirements. As such, the U.S. Supreme Court ruled that the USEPA should be required to regulate CO<sub>2</sub> and other greenhouse gases as pollutants under the Clean Air Act. To date, the USEPA has not developed a regulatory program for greenhouse gas emissions.

In September, 2006, Governor Schwarzenegger signed into law the California Global Warming Solutions Act of 2006 (Assembly Bill 32, codified at Section 38500 et seq. of the California Health & Safety Code). This law requires the CARB to determine what the statewide greenhouse gas emissions level was in 1990 and design and implement emission limits, regulations, and other measures, such that by 2020 statewide greenhouse gas emissions are reduced in a technologically feasible and cost-effective manner to the 1990 level.

As a result of the Global Warming Solutions Act, the CARB adopted three discrete early action measures to reduce GHG emissions. These measures involve complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance and increasing methane capture from landfills. On October 25, 2007, the CARB tripled the set of previously approved early action measures. The newly approved measures include Smartway truck efficiency (i.e., reducing aerodynamic drag), port electrification, reducing perfluorocarbons from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emission from the non-electricity sector. The Global Warming Solutions Act also required CARB to define the 1990 baseline emissions for California and adopt that baseline as the 2020 statewide emissions cap. CARB has determined that the total statewide aggregated greenhouse gas 1990 emissions level and 2020 emissions limit is 427 million metric tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e).

The Global Warming Solutions Act also established a timetable for CARB to complete each of the following responsibilities:

- By January 1, 2009, prepare and approve scoping plan for achieving the maximum technologically feasible and cost-effective reductions of GHGs from sources or categories of sources of GHGs.
- By January 1, 2010, adopt regulations to implement measures identified on the list published as the discrete early action GHG emissions reduction measures.
- By January 1, 2011, adopt greenhouse gas emission limits and emission reduction measures by regulation to achieve the maximum technologically feasible and cost-effective reductions in greenhouse gas emissions in furtherance of achieving the statewide greenhouse gas emissions limit, to become operative beginning on January 1, 2012.

Although no specific language in the Global Warming Solutions Act refers to CEQA compliance, comment letters from the California Attorney General encourages CEQA lead agencies and other agencies to consider global warming impacts and GHG emissions as a part of the environmental review process.

However, on June 19, 2008, the Governor's Office of Planning and Research published a technical advisory entitled "CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review"<sup>4</sup> (the "OPR Technical Advisory"), which offers informal guidance regarding the steps lead agencies should take to address climate change in their CEQA documents until such time as further state guidance is available on the thresholds of significance. The OPR's guidance was developed in cooperation with the California Resources Agency, CalEPA and CARB. The OPR Technical Advisory suggests that lead agencies: (i) make a good faith effort, based on available information, to calculate, model or estimate the amount of CO<sub>2</sub> and other GHG emissions from a project, (ii) undertake a project-by-project analysis of the significance of the impact, while being mindful that although climate change is ultimately a cumulative impact, not every individual project that emits GHG must necessarily be found to contribute to a significant cumulative impact on the environment, and (iii) impose mitigation measures to reduce GHG emissions to a less than significant level, or adopt a Statement of Overriding Considerations stating why further mitigation is not feasible. The OPR encourages agencies to develop standard GHG emission reduction or mitigation measures that can be applied on a project-by-project basis, and provides a preliminary menu of measures that lead agencies may wish to consider. The OPR also notes that CEQA can be a more effective tool for GHG emissions analysis and mitigation if it is supported and supplemented by sound land use development policies and practices that will reduce GHG emissions on a broad planning scale and that can provide for a programmatic approach to project-specific CEQA analysis and mitigation.

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<sup>4</sup> *State of California, Governor's Office of Planning and Research, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review, June 19, 2008.*

## Existing Air Quality

### *Air Pollution Climatology*

The project site is located within the Los Angeles County portion of the Basin. Ambient pollution concentrations recorded in Los Angeles County are among the highest in the four counties comprising the Basin.

The Basin is an area of high air pollution potential due to its climate and topography. The general region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. This Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions. Temperature typically decreases with height. However, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO<sub>2</sub> react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to CO and NO<sub>2</sub> emissions. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.). In the morning, CO levels are relatively high due to cold temperatures and the large number of cars traveling. High CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from automobiles, the highest CO concentrations in the Basin are associated with heavy traffic. NO<sub>2</sub> levels are also generally higher during fall and winter days.

### *Local Climate*

The mountains and hills within the Basin contribute to the variation of rainfall, temperature, and winds throughout the region. Within the project site and its vicinity, the average wind speed, as recorded at the Lennox Wind Monitoring Station, is approximately 4.7 miles per hour, with calm winds occurring approximately 13 percent of the time. Wind in the vicinity of the project site predominately blows from the west.<sup>5</sup>

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<sup>5</sup> SCAQMD, <http://www.aqmd.gov/smog/metdata/MeteorologicalData.html>.



The annual average temperature in the project area is 62.8 degrees Fahrenheit (°F). The project area experiences an average winter temperature of approximately 53.3°F and an average summer temperature of approximately 72.4°F. Total precipitation in the project area averages approximately 13 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages approximately eight inches during the winter, approximately three inches during the spring, approximately two inches during the fall, and less than one inch during the summer.<sup>6</sup>

### ***Air Monitoring Data***

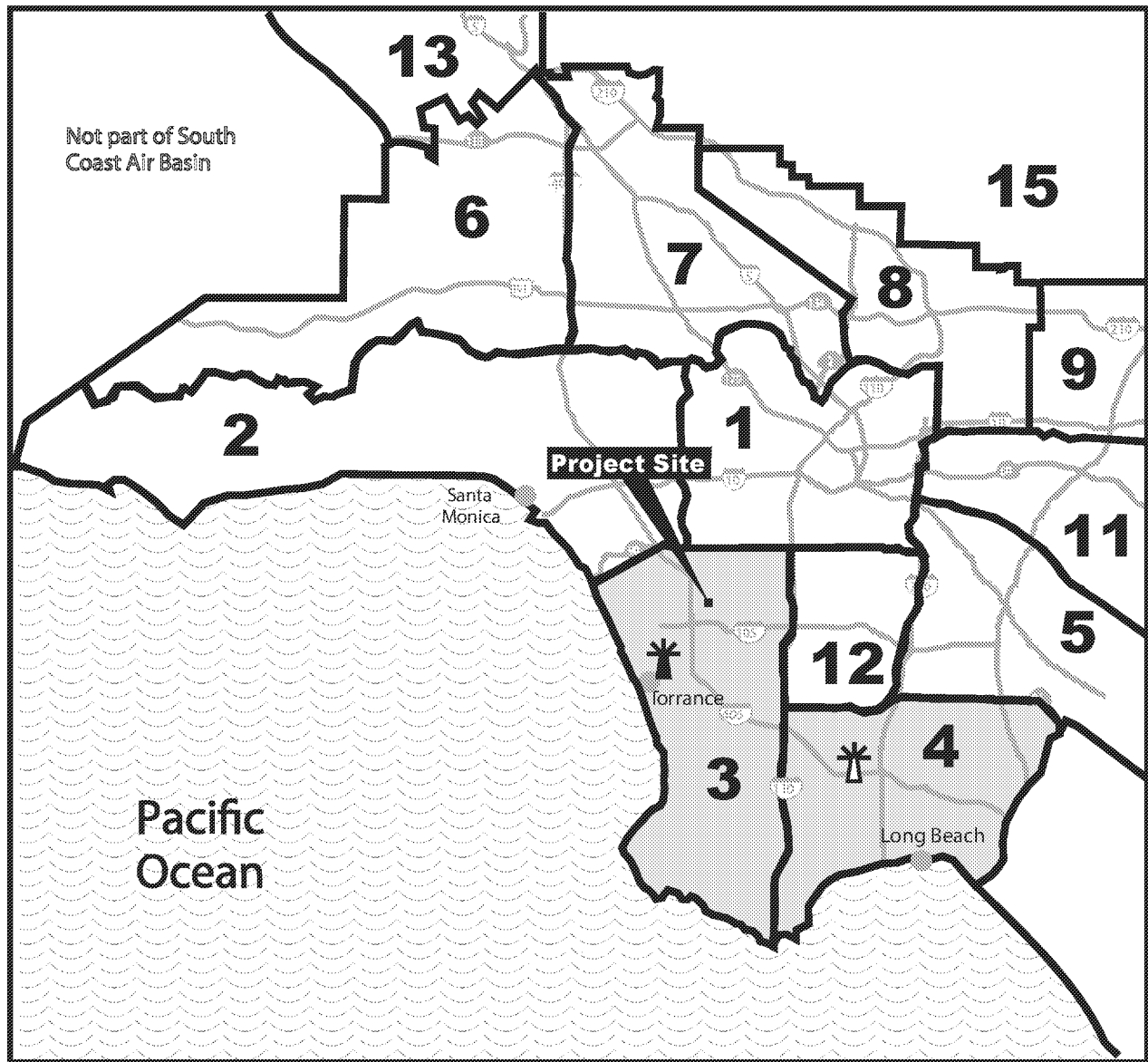
The SCAQMD monitors air quality conditions at 38 locations throughout the Basin. The proposed project is located in SCAQMD's Southwest Coastal Los Angeles County Air Monitoring Subregion (Monitoring Subregion No. 3) Historical data from Monitoring Subregion No. 3 were used to characterize existing conditions within the vicinity of the project area and to establish a baseline for estimating future conditions with and without the proposed project. Criteria pollutants monitored at Monitoring Subregion No. 3 include O<sub>3</sub>, CO, NO<sub>2</sub>, PM<sub>10</sub>, and SO<sub>2</sub>. However, Monitoring Subregion No. 3 does not monitor PM<sub>2.5</sub>. The nearest, most representative monitoring station that gathers PM<sub>2.5</sub> data is the South Coastal Los Angeles County Air Monitoring Subregion (Monitoring Subregion No. 4). The locations of the relevant air monitoring stations are shown in Figure IV.B-2. Table IV.B-2 shows pollutant levels, the State standards, and the number of exceedances recorded at the Hawthorne Monitoring Station from 2005 to 2007. The CAAQS for the criteria pollutants are also shown in the table.

**Table IV.B-2  
Ambient Air Quality Data in Project Vicinity**



Pollutant	Pollutant Concentration & Standards	Number of Days Above State Standard		
		2005	2006	2007
Ozone (1-hour)	Maximum 1-hr Concentration (ppm)	0.09	0.08	0.09
	Days > 0.09 ppm (State 1-hr standard)	0	0	0
Ozone (8-hour)	Maximum 8-hr concentration (ppm)	0.08	0.07	0.07
	Days > 0.07 ppm (State 8-hr standard)	1	0	1
Carbon Monoxide	Maximum 1-hr concentration (ppm)	3	3	3
	Days > 20 ppm (State 1-hr standard)	0	0	0
Carbon Monoxide	Maximum 8-hr concentration (ppm)	2.1	2.3	2.4
	Days > 9.0 ppm (State 8-hr standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hr Concentration (ppm)	0.09	0.10	0.08
	Days > 0.18 ppm (State 1-hr standard)	0	0	0
PM <sub>10</sub>	Maximum 24-hr concentration (µg/m <sup>3</sup> )	44	45	96
	Estimated Days > 50 µg/m <sup>3</sup> (State 24-hr standard)	0	0	2
PM <sub>2.5</sub>	Maximum Annual Arithmetic Mean (µg/m <sup>3</sup> )	16	14	15
	Exceed State Standard (12 µg/m <sup>3</sup> )?	Yes	Yes	Yes
Sulfur Dioxide	Maximum 24-hr Concentration (ppm)	0.012	0.010	0.009
	Days > 0.04 ppm (State 24-hr standard)	0	0	0

<sup>a</sup> Less than 12 months of data. May not be representative.  
Source: SCAQMD, [http://aqmd.gov/smog/historical\\_data.htm](http://aqmd.gov/smog/historical_data.htm).

<sup>6</sup> Western Regional Climate Center, <http://www.wrrc.dri.edu>, accessed May 29, 2007.

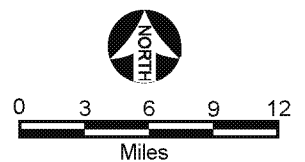


**Legend**

-  Hawthorne Monitoring Station
-  North Long Beach Monitoring Station

**Air Monitoring Areas in Los Angeles County:**

- |                                 |                               |
|---------------------------------|-------------------------------|
| 1. Central Los Angeles          | 8. West San Gabriel Valley    |
| 2. Northwest Coastal            | 9. East San Gabriel Valley    |
| 3. Southwest Coastal            | 11. South San Gabriel Valley  |
| 4. South Coastal                | 12. South Central Los Angeles |
| 5. Southeast Los Angeles County | 13. Santa Clarita Valley      |
| 6. West San Fernando Valley     | 15. San Gabriel Mountains     |
| 7. East San Fernando Valley     |                               |



Source: TAHA, 2007 and South Coast Air Quality Management District Air Monitoring Areas Map, 1999.

As Table IV.B-2 indicates, criteria pollutants CO, NO<sub>2</sub>, and SO<sub>2</sub> did not exceed the CAAQS during the 2005 through 2007 period. In addition, the one-hour State standard for O<sub>3</sub> was not exceeded during this period but the eight-hour State standard for O<sub>3</sub> was exceeded one time each in 2005 and 2007. Additionally, the PM<sub>10</sub> 24-hour standard was exceeded twice in 2007 and the annual State standard for PM<sub>2.5</sub> was exceeded in 2005, 2006, and 2007.

### ***Background Carbon Monoxide Conditions***

CO concentrations are typically used as an indicator of conformity with CAAQS because CO is the primary component of automobile exhaust (tailpipe emissions), and it does not readily react with other pollutants. In other words, operational air quality impacts associated with a project are generally best reflected through estimated changes in CO concentrations.

For purposes of this assessment, the ambient, or background, CO concentration is first established. SCAQMD defines the background level as the highest reading over the past three years. A review of data from Monitoring Subregion No. 3 for the 2005 to 2007 period indicates that the one- and eight-hour background concentrations are approximately 3 and 2.4 ppm, respectively. Accordingly, the existing one- and eight-hour background concentrations do not exceed the State CO standard of 20 ppm and 9.0 ppm, respectively.

### ***Existing Carbon Monoxide Concentrations at Project Area Intersections***

There is a direct relationship between traffic/circulation congestion and CO impacts since exhaust fumes from vehicular traffic is the primary source of CO. CO is a localized gas that dissipates very quickly under normal meteorological conditions. Therefore, CO concentrations decrease substantially as distance from the source (intersection) increases. The highest CO concentrations are typically found in areas directly adjacent to congested roadway intersections.

Existing CO concentrations adjacent to six study intersections were modeled for a combination of weekday and weekend conditions. The study intersections were selected to be representative of the project area and were based on traffic volume to capacity (V/C) ratio and the traffic level of service (LOS) as indicated in the traffic analysis.<sup>7,8</sup>

The selected intersections are as follows:

- La Brea Avenue/Centinel Avenue - AM Peak Hour
- La Brea Avenue/Florence Avenue - AM Peak Hour

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<sup>7</sup> Level of service is used to indicate the quality of traffic flow on roadway segments and at intersections. Level of service ranges from LOS A (free flow, little congestion) to LOS F (forced flow, extreme congestion).

<sup>8</sup> Linscott, Law & Greenspan, Engineers, Revised Traffic Impact Study for the Hollywood Park Redevelopment Project, August 1, 2008.

- La Brea Avenue/Century Boulevard - PM Peak Hour
- Prairie Avenue/Florence Avenue - AM Peak Hour
- Crenshaw Boulevard/Manchester Boulevard - Saturday MIDDAY
- Crenshaw Boulevard/Century Boulevard - Saturday MIDDAY

At each intersection, traffic-related CO contributions were added to background CO conditions. Traffic CO contributions were estimated using the USEPA CAL3QHC dispersion model, which utilizes traffic volume inputs and CARB EMFAC2007 emissions factors. Receptors for the CO analysis were located three meters (approximately ten feet) from each intersection corner.<sup>9</sup> Existing conditions at the six study intersections are shown in Table IV.B-3. One-hour CO concentrations range from approximately 4 ppm to 5 ppm and eight-hour CO concentrations range from approximately 3.4 ppm to 3.6 ppm. Presently, none of the study intersections exceed the State one- and eight-hour CO standards of 20 ppm and 9.0 ppm, respectively.

**Table IV.B-3**  
**Existing Carbon Monoxide Concentrations <sup>a</sup>**

Intersection	Parts Per Million (ppm)	
	1-hour	8-hour
La Brea Avenue/Centinel Avenue	4	3.4
La Brea Avenue/Florence Avenue	5	3.5
La Brea Avenue/Century Boulevard	5	3.5
Prairie Avenue/Florence Avenue	5	3.6
Crenshaw Boulevard/ Manchester Boulevard	5	3.5
Crenshaw Boulevard/Century Boulevard	5	3.5
<b>State Standard</b>	<b>20</b>	<b>9.0</b>

<sup>a</sup> All concentrations include one- and eight-hour ambient concentrations of 3 ppm and 2.4 ppm, respectively.  
Source: TAHA, 2008.

### *Air Quality Sensitive Receptors*

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following groups who are most likely to be affected by air pollution: children under 14, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive

<sup>9</sup> Caltrans, *Transportation Project-Level Carbon Monoxide Protocol*, 1997.

receptors include residences, schools, playgrounds, child care centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Figure IV.B-3 shows sensitive receptors within one-quarter mile (1,320 feet) of the project site. Residential sensitive receptors include the following:

- Single-family residences located adjacent and to the east of the project site
- Single-family residences located adjacent and to the northeast of the project site
- Single- and multi-family residences located approximately 75 feet west of the project site
- Multi-family residences located approximately 75 feet south of the project site
- Single-family residences located approximately 500 feet north of the project site

Institutional sensitive receptors include the following:

- Inglewood Junior Academy located approximately 75 feet west of the project site
- William H. Kelso Elementary School located approximately 125 feet west of the project site
- Greater New Bethel Baptist Church located approximately 675 feet west of the project site
- Holy Trinity Evangelical Lutheran Church located approximately 850 feet east of the project site
- First Church of God located approximately 900 feet east of the project site
- Inglewood Southside Christian Church located approximately 1,100 feet south of the project site
- Centinela Hospital located approximately 1,100 feet west of the project site
- Warren Lane Elementary School located approximately 1,175 feet east of the project site

The above sensitive receptors represent the nearest residential and institutional land uses with the potential to be impacted by the proposed project. Additional single- and multi-family residences are located in the surrounding community within one-quarter mile of the project site.

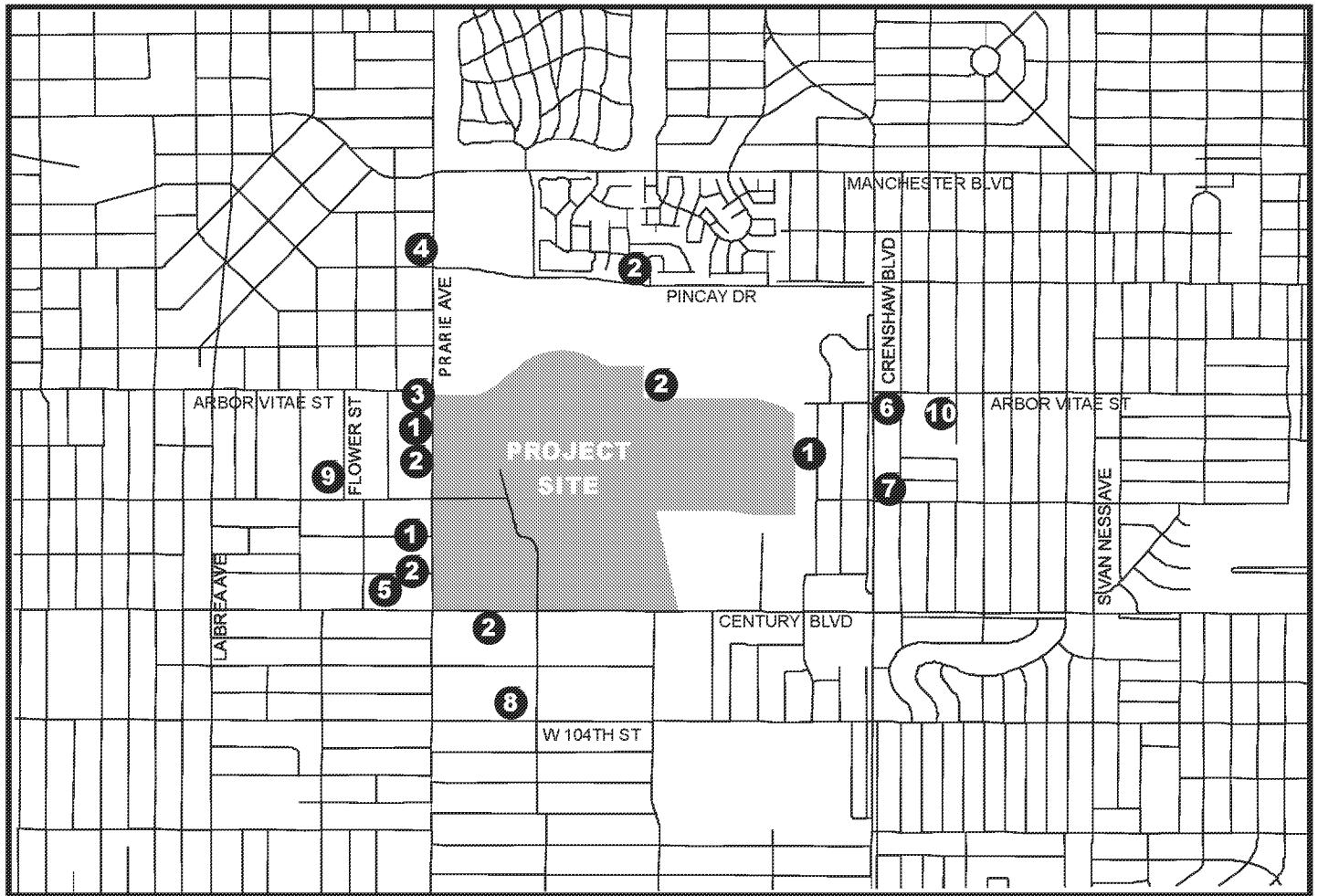
## **ENVIRONMENTAL IMPACT**

### **Analytical Methodology**

The air quality analysis in the technical report is consistent with the methods described in the SCAQMD CEQA Air Quality Handbook (1993 edition), as well as the updates to the CEQA Air Quality Handbook, as provided on the SCAQMD website.<sup>10</sup>

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<sup>10</sup> SCAQMD, <http://www.aqmd.gov/ceqa/hdbk.html>, accessed May 29, 2007.



## Legend

# Sensitive Receptors

1. Single-Family Residence
2. Multi-Family Residence
3. Inglewood Junior Academy
4. William H. Kelso Elementary School
5. Greater New Bethel Baptist Church
6. Holy Trinity Evangelical Lutheran Church
7. First Church of God
8. Inglewood Southside Christian Church
9. Centinela Hospital
10. Warren Lane Elementary



Source: TAHA, 2007.

### ***Regional and Local Emissions***

Regional and localized construction emissions were analyzed for the proposed project. Construction emissions were calculated using CARB's URBEMIS2007 model. Regional emissions were compared to SCAQMD regional thresholds to determine project significance. The localized construction analysis followed guidelines published by the SCAQMD in the Localized Significance Methodology for CEQA Evaluations (SCAQMD Localized Significance Threshold (LST) Guidance Document).<sup>11</sup> In January 2005, the SCAQMD supplemented the SCAQMD LST Guidance Document with Sample Construction Scenarios for Projects Less than Five Acres in Size.<sup>12</sup>

URBEMIS2007 was also used to calculate operations emissions (i.e., mobile and area). Localized CO emissions were calculated utilizing USEPA's CAL3QHC dispersion model and CARB's EMFAC2007 model. EMFAC2007 is the latest emission inventory model that calculates emission inventories and emission rates for motor vehicles operating on roads in California. This model reflects the CARB's current understanding of how vehicles travel and how much they pollute. The EMFAC2007 model can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future. CAL3QHC is a model developed by USEPA to predict CO and other pollutant concentrations from motor vehicles at roadway intersections. The model uses a traffic algorithm for estimating vehicular queue lengths at signalized intersections.

The proposed project does not contain lead emissions sources. Therefore, emissions and concentrations related to this pollutant were not analyzed in the Air Quality Technical Report.<sup>13</sup>

### ***Greenhouse Gas Emissions***

#### *Greenhouse Gas Emissions Estimate*

Greenhouse gas emissions associated with the Proposed Project were estimated based on guidance provided by the California Air Pollution Control Officers Association (CAPCOA).<sup>14</sup> For specific plans, the CAPCOA guidance recommends using URBEMIS2007 to calculate construction and mobile source emissions. The CAPCOA guidance also recommends that the California Climate Action Registry General Reporting Protocol to calculate energy consumption emissions (i.e., natural gas and electricity).

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<sup>11</sup> SCAQMD, *Localized Significance Methodology*, June 2003.

<sup>12</sup> SCAQMD, *Sample Construction Scenarios for Projects Less than Five Acres in Size*, January 2005.

<sup>13</sup> Prior to 1978, mobile emissions were the primary source of lead resulting in air concentrations. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. Currently, industrial sources are the primary source of lead resulting in air concentrations. Since the proposed project does not contain an industrial component, lead emissions are not analyzed in this report.

<sup>14</sup> CAPCOA, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, January 2008.

Each GHG has a different global warming potential, called a CO<sub>2</sub> equivalent value, which describes its global warming potency. CO<sub>2</sub> is the most common GHG and has an equivalent value of one. The CO<sub>2</sub> equivalent values for CH<sub>4</sub> and N<sub>2</sub>O are 21 and 310, respectively.

#### *Greenhouse Gas Construction Emissions*

GHG emissions from construction activity were calculated using URBEMIS2007. The URBEMIS2007 model utilizes emissions factors obtained from the CARB OFFROAD2007 Model. The OFFROAD2007 model incorporates the CARBs most recent emission factors for heavy-duty construction equipment.

#### *Mobile Source Emissions*

GHG emissions from mobile sources are a function of vehicle miles traveled (VMT). CARB's URBEMIS2007 emissions inventory model calculates daily VMT based on the average daily trips (ADT). The Existing and Future With Project weekend and weekday ADTs were obtained from the project traffic study. The weekday and weekend ADTs were input into URBEMIS2007 to determine weekday and weekend VMTs, which were converted into a yearly VMT. On an annual basis, the Existing and Future With Project VMTs were determined to be 59,749,191 and 127,929,238, respectively. Trip lengths were obtained from the URBEMIS2007 default values. URBEMIS2007 provides GHG emissions in tons per year. The weekday and weekend conditions were modeled in URBEMIS2007 and the results were divided by 365 days to obtain tons per day. The tons per day were then adjusted to account for 261 weekdays and 104 weekend days per year.

#### *Natural Gas Combustion*

GHG emissions would result from the combustion of natural gas on the project site. Natural gas usage rates, presented in cubic feet per month, were obtained from Table IV.J-7 in Section IV.J, Public Utilities. As presented in the DEIR, existing land uses on the project site consume 46,738,800 cubic feet per year of natural gas, and the proposed land uses would consume 285,658,500 cubic feet per year of natural gas. The net increase in natural gas consumption as a result of the Proposed Project would be 238,919,700 cubic feet per year.

The natural gas GHG emission rates were obtained from the California Climate Action Protocol (the "Protocol"). The Protocol states that the CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O natural gas consumption emission rates are 52.78, 0.01, and 0.0001 million British thermal units (MBTU) per year, respectively. The natural gas usage rates presented in the DEIR were converted into MBTU and multiplied by the Protocol emission rates to obtain GHG emissions.

#### *Electricity Consumption*

GHG emissions would result from the combustion of fossil fuels to provide energy for the Proposed Project. Electricity usage rates were obtained from Table IV.J-6 of the DEIR. As presented in the DEIR, existing land uses on the project site use 26,010,004 kilowatt-hours (kWh) per year of electricity and the



proposed land uses would use 33,814,918 kWh per year of electricity. The net increase in electricity use as a result of the proposed project would be 7,804,914 kWh per year.

The electricity GHG emission rates were obtained from the Protocol. The Protocol states that the CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O electricity emission rates are 8.1E-01, 6.7E-06, and 3.7E-06 kWh per year, respectively.

The electricity usage rates presented in the DEIR were multiplied by the Protocol emission rates to obtain GHG emissions.

#### *Greenhouse Gas Emissions*

The presented GHG emissions represent worst-case emissions and do not include energy conservation measures. During the construction process, the proposed project would emit approximately 35,687 tons of CO<sub>2</sub>e. Yearly operational GHG emissions are shown in Table IV.B-4. As shown, the proposed project would result in a net increase of 53,227 tons per year of CO<sub>2</sub> equivalent emissions.

**Table IV.B-4  
Estimated Annual Greenhouse Gas Emissions**

Scenario	Carbon Dioxide Equivalent (tons per year)
Existing	
Mobile	30,716
Natural Gas	25
Electricity	9,507
Total Existing	40,248
Project	
Mobile	65,994
Natural Gas	15,121
Electricity	12,360
Total Project	93,475
Net	53,227
<i>Source: TAHA, 2008.</i>	

#### **Threshold of Significance**

To determine whether a proposed project would have a significant impact to air quality, Appendix G to the State CEQA Guidelines questions whether a project would:

- a) Conflict with or obstruct implementation of the applicable air quality plan;

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors);
- d) Expose sensitive receptors to substantial pollutant concentrations; or
- e) Create objectionable odors affecting a substantial number of people.

Specific threshold related to the above general thresholds are presented below for construction and operational activity.

### *Construction Phase Significance Criteria*

The proposed project would have a significant impact if:

- Daily construction emissions were to exceed SCAQMD construction emissions thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, or PM<sub>10</sub>, as presented in Table IV.B-5.
- Project-related fugitive dust and construction equipment combustion emissions cause an incremental increase in localized PM<sub>2.5</sub> or PM<sub>10</sub> concentrations of 10.4 µg/m<sup>3</sup>, or cause a violation of NO<sub>2</sub> or CO ambient air quality standards.
- The proposed project would generate significant emissions of toxic air contaminants (TACs).
- The proposed project would create an odor nuisance.

**Table IV.B-5  
SCAQMD Daily Construction Emissions Thresholds**

Criteria Pollutant	Pounds Per Day
Volatile Organic Compounds (VOC)	75
Nitrogen Oxides (NO <sub>x</sub> )	100
Carbon Monoxide (CO)	550
Sulfur Oxides (SO <sub>x</sub> )	150
Fine Particulates (PM <sub>2.5</sub> )	55
Particulates (PM <sub>10</sub> )	150
<i>Source: SCAMQD, 2008.</i>	

### *Operations Phase Significance Criteria*

The proposed project would have a significant impact if:

- Daily operational emissions were to exceed SCAQMD operational emissions thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, or PM<sub>10</sub>, as presented in Table IV.B-6;
- Project-related traffic causes CO concentrations at study intersections to violate the CAAQS for either the one- or eight-hour period. The CAAQS for the one- and eight-hour periods are 20 ppm and 9.0 ppm, respectively. If CO concentrations currently exceed the CAAQS, then an incremental increase of 1.0 ppm over “no project” conditions for the one-hour period would be considered a significant impact. An incremental increase of 0.45 ppm over the “no project” conditions for the eight-hour period would be considered significant;<sup>15</sup>
- The proposed project would generate significant emissions of TACs;
- The proposed project would create an odor nuisance; and
- The proposed project would not be consistent with the AQMP.

### ***Global Warming***

At this time there are no quantitative emission thresholds and there are no established significance criteria to determine project impacts with respect to climate change or GHGs. Emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. Due to the complex physical, chemical, and

**Table IV.B-6  
SCAQMD Daily Operational Emissions Thresholds**

<b>Criteria Pollutant</b>	<b>Pounds Per Day</b>
Volatile Organic Compounds (VOC)	55
Nitrogen Oxides (NO <sub>x</sub> )	55
Carbon Monoxide (CO)	550
Sulfur Oxides (SO <sub>x</sub> )	150
Fine Particulates (PM <sub>2.5</sub> )	55
Particulates (PM <sub>10</sub> )	150
<i>Source: SCAQMD, 2008.</i>	

atmospheric mechanisms involved in global climate change, it is not possible to predict the specific impact, if any, to global climate change from one project’s relatively small incremental increase in

<sup>15</sup> Consistent with the SCAQMD Regulation XIII definition of a significant impact.

emissions. Nonetheless the project's GHG emissions were estimated for comparison purposes, and analyzed in the cumulative impacts analysis.

### **Impacts Determined to be Less Than Significant**

Threshold questions (a) through (e) are analyzed in the discussion below.

#### **Construction Phase Impacts**

The first construction phase would last approximately 30 months with additional phased construction lasting until 2014. Although construction-related emissions are temporary, adverse air quality impacts may still result.

Construction of the proposed project would generally occur in three phases. The first phase would include: (1) demolition of existing structures, (2) grading and excavation, (3) construction workers traveling to and from project sites, (4) delivery and hauling of construction supplies and debris to and from project sites, (5) fuel combustion by on-site construction equipment, (6) the application of architectural coatings and other building materials that release VOC, and (7) asphalt paving. The second and third phases would include: (1) construction workers traveling to and from project sites, (2) delivery and hauling of construction supplies to and from project site, (3) fuel combustion by on-site construction equipment, (4) the application of architectural coatings and other building materials that release VOC, and (5) asphalt paving. The retail component along Century Boulevard and Prairie Avenue, the casino renovation and reconfiguration, and some of the residential units would be the first phase, while the remaining residential units would generally be completed in the second and third phases. These construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. It is anticipated that some construction activities and construction phases would overlap.

#### ***Regional Emissions***

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., excavation) activities. NO<sub>x</sub> emissions would primarily result from the use of construction equipment. During the finishing phase, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

It is mandatory for all construction projects in the Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk

material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. Compliance with Rule 403 would reduce regional PM<sub>10</sub> emissions associated with construction activities by approximately 61 percent.

URBEMIS2007 was used to estimate daily construction emissions. Table IV.B-7 shows the estimated daily emissions associated with each year of construction. As shown, daily construction regional emissions would exceed the SCAQMD regional thresholds for VOC, NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, regional construction emissions would result in a significant air quality impact without incorporation of mitigation measures.

### *Localized Impacts*

Based on Table IV.B-7, maximum on-site emissions for PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>x</sub>, would occur in Year 2009 when grading activity overlaps with Casino renovation and reconfiguration. The maximum on-site emissions for CO and VOC would occur in Year 2011 when Phase II infrastructure construction, building erection, and architectural coating activity overlap. Wind in the project area predominantly blows from the west to the east. As such, sensitive receptors located east of the project site would experience the highest localized pollutant concentrations. Therefore, localized emissions were modeled at sensitive receptors on the eastern boundary of the project site.

Construction emissions were input into the ISC dispersion model to determine localized impacts. Results of the dispersion modeling are shown in Table IV.B-8. The dispersion modeling results indicate that localized CO emissions would be less than the SCAQMD daily significance thresholds. However, localized emissions of PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>2</sub> would exceed the localized thresholds. The maximum localized emissions would be temporary and would generally occur during the heaviest periods of construction activity. Nonetheless, localized construction emissions would result in a significant air quality impact without implementation of mitigation measures.

### *Toxic Air Contaminant Impacts*

The Phase I Environmental Assessment has identified asbestos-containing materials (ACM) on the project site.<sup>16</sup> As such, the proposed project would be required to comply with SCAQMD Rule 1403 (Asbestos Emissions From Demolition/Renovation Activities). SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM. The requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules, ACM handling and clean-up procedures, and storage, disposal, and landfill requirements for asbestos-containing waste materials. The proposed project would also be required to maintain records, including waste shipment

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<sup>16</sup> *Environ International Corporation, Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, California, April 11, 2005.*

records, and use appropriate warning labels, signs, and markings. As such, construction activity would result in a less than significant toxic air contaminant impact.

**Table IV.B-7  
Regional Construction Emissions - Unmitigated**

Construction Year	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub> <sup>a</sup>	PM <sub>10</sub> <sup>a</sup>
2009 <sup>b</sup>	71	697	346	<1	296	1,322
2010 <sup>c</sup>	51	481	246	<1	278	1,267
2011 <sup>d</sup>	123	478	355	<1	32	36
2012 <sup>e</sup>	115	407	328	<1	28	30
2013 <sup>f</sup>	60	424	340	<1	27	30
2014 <sup>g</sup>	92	242	232	<1	17	19
<b>Maximum Regional Total</b>	<b>123</b>	<b>697</b>	<b>355</b>	<b>&lt;1</b>	<b>296</b>	<b>1,322</b>
<b>SCAQMD Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	Yes	Yes	No	No	Yes	Yes

<sup>a</sup> Assumes proper implementation of SCAQMD Rule 403 – Fugitive Dust.  
<sup>b</sup> Maximum Year 2009 emissions would occur when demolition, grading and Phase I infrastructure construction activity overlap.  
<sup>c</sup> Maximum Year 2010 emissions would occur when grading and Phase I infrastructure construction activity overlaps.  
<sup>d</sup> Maximum Year 2011 emissions would occur when Phase II infrastructure construction, building erection, and architectural coating activity overlap.  
<sup>e</sup> Maximum Year 2012 emissions would occur when Phase III infrastructure construction, building erection, and architectural coating activity overlap.  
<sup>f</sup> Maximum Year 2013 emissions would occur when Phase III infrastructure construction activity overlaps with building erection activity.  
<sup>g</sup> Maximum Year 2014 emissions would occur when building erection and architectural coating activity overlap.  
 Source: TAHA, 2008.

**Table IV.B-8  
Localized Construction Emissions - Unmitigated**

Pollutant	Estimated Emissions (lbs/day)	Concentration at Nearest Sensitive Receptor	Significance Threshold	Significant Impact?
PM <sub>2.5</sub>	294	116 µg/m <sup>3</sup>	10.4 µg/m <sup>3</sup>	Yes
PM <sub>10</sub>	1,318	535 µg/m <sup>3</sup>	10.4 µg/m <sup>3</sup>	Yes
NO <sub>2</sub> <sup>a</sup>	631	0.64 µg/m <sup>3</sup>	0.18 ppm	Yes
CO (One-Hour) <sup>b</sup>	269	3.5 ppm	20 ppm	No
CO (Eight-Hour) <sup>b</sup>	269	2.6 ppm	9.0 ppm	No

<sup>a</sup> The NO<sub>2</sub> concentration includes a background concentration of 0.11 ppm.  
<sup>b</sup> The CO concentration includes one- and eight-hour background concentrations of 3.0 and 2.4 ppm, respectively.  
 Source: TAHA, 2008.

A diesel health risk assessment (HRA) was completed to determine the risk posed to sensitive receptors from construction activity. The SCAQMD has not published guidance for completing construction HRAs. The SCAQMD has published guidance for calculating the health risk associated with mobile

source idle emissions.<sup>17</sup> This document was used as the basis for calculating the health risk associated with construction activity. The HRA calculated the lifetime carcinogenic risk associated with heavy-duty construction equipment, on-site haul truck movement, on-site haul truck idling, and off-site haul truck travel on the local roadway system. The analysis included a credit for diesel emissions from existing on-site equipment. Emissions were modeled using the ISC dispersion model. The ISC dispersion model does not indicate how far the risk is spread; instead, it indicates the maximum risk. The HRA resulted in an unmitigated carcinogenic risk of 30 persons in one million, which is greater than the ten persons in one million significance threshold. As such, construction-related diesel emissions would result in a significant impact. It should be noted that the SCAQMD has identified the area surrounding the project site as having an existing carcinogenic risk of 804 people in one million.<sup>18</sup>

### ***Odor Impacts***

Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the project site. The proposed project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary. As such, proposed project construction would not cause an odor nuisance, and construction odors would result in a less than significant impact.

### **Operational Phase Impacts**

#### ***Regional Impacts***

Long-term project emissions would be generated by area sources, such as natural gas combustion and consumer products (e.g., aerosol sprays) and mobile sources. Motor vehicles generated by the proposed project would be the predominate source of long-term project emissions. According to the traffic report, existing weekday activity generates 19,936 daily vehicle trips. The proposed project would generate 37,158 daily vehicle trips, resulting in a net weekday increase of 17,222 daily vehicle trips. Existing weekend activity generates 13,986 daily vehicle trips. The proposed project would generate 39,494 daily vehicle trips, resulting in a net weekend increase of 25,508 daily vehicle trips.<sup>19</sup>

As part of the proposed circulation plan, the Hollywood Park Specific Plan will incorporate a Transportation Demand Management (TDM) Strategy. See Section IV.L.Traffic/Transportation for a discussion of the TDM Strategy.

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<sup>17</sup> SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, August 2003.

<sup>18</sup> SCAQMD, *Multiple Air Toxics Exposure Study in the South Coast Air Basin*, January 2008.

<sup>19</sup> Linscott, Law & Greenspan, Engineers, *Revised Traffic Impact Study for the Hollywood Park Redevelopment Project*, August 1, 2008.

Mobile and area source emissions were estimated using URBEMIS2007. Weekday and weekend operational emissions are shown in Tables IV.B-9 and IV.B-10, respectively. As shown, weekday and weekend regional operational emissions would exceed SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, regional operational emissions would result in a significant air quality impact without incorporation of mitigation measures.

**Table IV.B-9  
Daily Operations Emissions – Future Weekday Conditions**

Emission Source	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
Existing Land Uses						
Mobile Sources	118	182	1,451	2	60	309
Area Sources	<1	6	7	<1	<1	<1
Total Emissions	118	188	1,458	2	60	309
Proposed Project Land Uses						
Mobile Sources	244	353	2,856	4	117	598
Area Sources <sup>a</sup>	157	40	30	<1	<1	<1
Total Emissions	401	393	2,886	4	117	598
Net Emissions	283	205	1,428	2	57	289
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	Yes	Yes	Yes	No	Yes	Yes
<sup>a</sup> Area sources include emissions from natural gas combustion and consumer products (e.g., aerosol sprays). Source: TAHA, 2008.						

**Table IV.B-10  
Daily Operations Emissions – Future Weekend Conditions**

Emission Source	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub>	PM <sub>10</sub>
Existing Land Uses						
Mobile Sources	84	128	1,018	1	42	217
Area Sources	<1	6	7	<1	<1	<1
Total Emissions	84	134	1,025	1	42	217
Proposed Project Land Uses						
Mobile Sources	247	368	2,970	4	122	624
Area Sources <sup>a</sup>	157	39	28	<1	<1	<1
Total Emissions	404	407	2,998	4	122	624
Net Emissions	320	273	1,973	3	80	407
<b>SCAQMD Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	Yes	Yes	Yes	No	Yes	Yes
<sup>a</sup> Area sources include emissions from natural gas combustion and consumer products (e.g., aerosol sprays). Source: TAHA, 2008.						



The potential exists that the later stages of project construction could occur concurrently with the occupancy of the earlier stages of development. Construction emissions (Table IV.B-7) combined with operational emissions (Tables IV.B-9 and IV.B-10) would result in concurrent emissions that exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, the proposed project would result in a significant emissions impact associated with concurrent emissions.

### *Localized Impacts*

CO concentrations in 2014 are expected to be lower than existing conditions due to stringent State and federal mandates for lowering vehicle emissions. Although traffic volumes would be higher in the future both without and with the implementation of the proposed project, CO emissions from mobile sources are expected to be much lower due to technological advances in vehicle emissions systems, as well as from normal turnover in the vehicle fleet. Accordingly, increases in traffic volumes are expected to be offset by increases in cleaner-running cars as a percentage of the entire vehicle fleet on the road.<sup>20</sup>

The State one- and eight-hour CO standards may potentially be exceeded at congested intersections with high traffic volumes. An exceedance of the State CO standards at an intersection is referred to as a CO hotspot. The SCAQMD recommends a CO hotspot evaluation of potential localized CO impacts when V/C ratios are increased by two percent at intersections with a LOS of D or worse. SCAQMD also recommends a CO hotspot evaluation when an intersection decreases in LOS by one level beginning when LOS changes from C to D.

Based on the traffic study, a localized CO hotspot analysis was completed for the selected intersections:

- La Brea Avenue/Centinel Avenue - AM Peak Hour
- La Brea Avenue/Florence Avenue - AM Peak Hour
- La Brea Avenue/Century Boulevard - PM Peak Hour
- Prairie Avenue/Florence Avenue - AM Peak Hour
- Crenshaw Boulevard/Manchester Boulevard - Saturday Midday
- Crenshaw Boulevard/Century Boulevard - Saturday Midday

The USEPA CAL3QHC micro-scale dispersion model was used to calculate CO concentrations for 2014 “no project” and “project” conditions. CO concentrations at the six study intersections are shown in Table IV.B-11. As indicated, one-hour CO concentrations under “project” conditions would be approximately 3 at worst-case sidewalk receptors. Eight-hour CO concentrations under “project” conditions would range from approximately 1.8 ppm to 2.1 ppm. The State one- and eight-hour standards

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<sup>20</sup> Consistent with CARB’s vehicle emissions inventory.

of 20 ppm and 9.0 ppm, respectively, would not be exceeded at the six study intersections. Thus, a less than significant impact is anticipated.

**Table IV.B-11  
2006 and 2014 Carbon Monoxide Concentrations <sup>a</sup>**

Intersection	1-Hour (parts per million)			8-Hour (parts per million)		
	Existing (2006)	No Project (2014)	Project (2014)	Existing (2006)	No Project (2014)	Project (2014)
La Brea Avenue/Centinel Avenue	4	2	3	3.4	1.7	1.8
La Brea Avenue/Florence Avenue	5	3	3	3.5	1.8	1.8
La Brea Avenue/Century Boulevard	5	3	3	3.5	1.8	1.9
Prairie Avenue/Florence Avenue	5	3	3	3.6	1.8	1.8
Crenshaw Boulevard/ Manchester Boulevard	5	3	3	3.5	1.8	1.8
Crenshaw Boulevard/Century Boulevard	5	3	3	3.5	2.0	2.1
State Standard	20			9.0		
<sup>a</sup> Existing concentrations include year 2006 one- and eight-hour ambient concentrations of 3 ppm and 2.4 ppm, respectively. No Project and Project concentrations include year 2014 one- and eight-hour ambient concentrations of 1.5 ppm and 1.1 ppm, respectively.						
<sup>b</sup> Source: TAHA, 2008.						

CO is a gas that disperses quickly. Thus, CO concentrations at sensitive receptor locations are expected to be much lower than CO concentrations adjacent to the roadway intersections. Additionally, the intersections were selected based on poor LOS and high traffic volumes. Sensitive receptors that are located away from congested intersections or are located near roadway intersections with better LOS are expected to be exposed to lower CO concentrations. As shown in Table IV.B-11, CO concentrations would not exceed the State one- and eight-hour standards. Thus, no significant increase in CO concentrations at sensitive receptor locations is expected, resulting in a less than significant impact.

A localized CO hotspot analysis was also completed for the proposed parking structures in the mixed-use area of the Project Site. For purposes of this analysis, it was assumed that the proposed project would include five parking structures ranging from five to seven parking levels and containing 570 to 2,199 parking spaces. It should be noted that each structure was assumed to be maximized (i.e. as large and as tall as possible) for purposes of this analysis but it is anticipated that parking structures would be smaller, as fewer parking spaces would be required to support the proposed mix of land uses. As shown in Table IV.B-12, one-hour concentrations would range from 2.0 to 2.5 ppm, and eight-hour concentrations would range from 1.4 to 1.8 ppm. The State one- and eight-hour standards of 20 and 9.0 ppm, respectively, would not be exceeded at the five parking structures. Thus, a less than significant impact is anticipated.

**Table IV.B-12  
Carbon Monoxide Concentrations Near Proposed Parking Structures<sup>a</sup>**

Station	Structure 1	Structure 2	Structure 3	Structure 4	Structure 4b	Structure 5
Spaces	2,199	1,121	2,005	1,228	655	570
Acres	2.6	1.9	2.2	0.9	0.9	1.0
Parking Levels	5	5	5	7	5	2
<b>1-Hour CO Concentrations (parts per million)</b>						
25 Feet	2.4	2.2	2.2	2.1	2.0	2.0
50 Feet	2.5	2.2	2.2	2.1	2.0	2.0
100 Feet	2.5	2.2	2.2	2.1	2.0	2.0
<b>8-Hour CO Concentrations (parts per million)</b>						
25 Feet	1.7	1.5	1.5	1.5	1.4	1.4
50 Feet	1.8	1.6	1.5	1.5	1.4	1.4
100 Feet	1.8	1.5	1.5	1.5	1.4	1.4
<sup>a</sup> CO concentrations assume peak evening operations at parking structures. EMFAC2007 emissions factors for running exhaust emissions and starting emissions were used. The USEPA SCREEN 3 dispersion model was used to estimate concentrations at ground level from mobile sources on each level of a multi-level parking structure. Parking garages are assumed to have sufficient egress capacity to clear the peak parking demand during a one-hour period. All concentrations include year 2014 1- and 8-hour ambient concentrations of 1.5 ppm and 1.1 ppm, respectively. Source: TAHA, 2008.						

### ***Toxic Air Contaminant Impacts***

The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.<sup>21</sup> The proposed project would develop residential, hotel, casino/gaming, civic, open spaces, retail and office/commercial uses on the project site. These uses are not anticipated to generate a substantial number of daily truck trips. The primary source of potential TACs associated with proposed project operations is diesel particulates from delivery trucks (e.g., truck traffic on local streets and on-site truck idling). The number of heavy-duty trucks (e.g., delivery trucks) accessing the project site on a daily basis would be minimal, and the trucks that do visit the site would not idle on-site for extended periods of time. Based on the limited activity of the TAC sources, the proposed project would not warrant the need for a health risk assessment associated with on-site activities, and potential TAC impacts would be less than significant.

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The proposed project would not include any of these potential sources,

<sup>21</sup> SCAQMD, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, December 2002.

although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). As such, the proposed project would not release substantial amounts of TACs, and no significant impact on human health would occur.

### ***Odor Impacts***

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The project site would be developed with residential, hotel, casino/gaming, civic, open spaces, retail and office/commercial and not land uses that are typically associated with odor complaints. On-site trash receptacles would have the potential to create adverse odors. As trash receptacles would be located and maintained in a manner that promotes odor control, no adverse odor impacts are anticipated from these types of land uses. Therefore, the proposed project would not result in activities that create objectionable odors. No significant impacts would occur.

### **Consistency with the Air Quality Management Plan**

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook. There are two key indicators of consistency. These indicators are discussed below.

- ***Consistency Criterion No. 1:*** The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Consistency Criterion No. 1 refers to violations of the CAAQS. CO is the preferred pollutant for assessing local area air quality impacts because it is primarily emitted by motor vehicles, and it does not readily react with other pollutants. Based on methodologies set forth by SCAQMD, one measure to determine whether the proposed project would cause or contribute to a violation of an air quality standard would be based on the estimated CO concentrations at intersections that would be affected by the proposed project. The CO hotspot analysis indicates that the proposed project would not result in an exceedance of the State one- and eight-hour CO concentration standards. Therefore, the proposed project complies with Consistency Criterion No. 1.

- ***Consistency Criterion No. 2:*** The Proposed Project will not exceed the assumptions in the AQMP in 2010 or increments based on the year of the project build-out phase.

The SCAQMD AQMP was developed to provide methods for controlling pollutant emissions within the Basin. Many of the design aspects of the project are consistent with the goals of the AQMP. For example, the proposed mixed-use development would potentially reduce regional vehicle miles traveled by decreasing residential to retail trip lengths, the Proposed Project would be located near heavily traveled roadways that are serviced by the Los Angeles County

Metropolitan Transportation Authority, and the Proposed Project would provide housing in a region in need of and that can support more housing. The 2007 AQMP was adopted by the SCAQMD on June 1, 2007 and is based upon growth forecasts in the 2004 Regional Transportation Plan. Per the growth forecasts in the 2004 RTP, the housing growth generated by the Proposed Project would represent approximately 85 percent of the remaining anticipated housing growth for the City by 2015. However, since the Regional Transportation Plan has been recently updated and the growth forecasts revised for the City, the Proposed Project would not be consistent with the most recent SCAG growth projections and therefore will not be consistent with the AQMP when it is updated to reflect the new growth projections. The Proposed Project's growth and proposed zoning was not anticipated by SCAG when the growth projections were finalized given the existing principal use of the Project Site as a racetrack and the request by the City to adjust the growth forecasts and the housing allocated to Inglewood. Since the Proposed Project would not be consistent with existing zoning and would require a zone change and General Plan amendment, the use of the site as a master-planned mixed-use development was not reasonably foreseen and therefore not accounted for in the growth forecasts. (For a more detailed discussion of the Project and its relationship to regional growth projections, see Section IV.H, Population, Housing & Employment.) As such, the Proposed Project would result in a significant unavoidable impact with respect to AQMP consistency.

### **Greenhouse Gas Emissions**

Because it is impossible to trace the impacts of a single project to a change in overall climate, potential impacts from GHG emissions should not be considered on a project-level basis, but rather on a cumulative basis. No guidance exists to indicate what level of GHG emissions would be considered substantial enough to result in a significant adverse impact on global climate. Even though the GHG emissions associated with an individual development project could be estimated, there is no emissions threshold that can be used to evaluate the significance of these emissions. Also, global climate change models are not sensitive enough to be able to predict the effect of a single project on global temperatures and the resultant effect on climate; therefore, they cannot be used to evaluate the significance of a project's impact. Thus, insufficient information and predictive tools exist to assess whether a single project would result in a significant impact on global climate. For these reasons, determining the significance of the impact of the Proposed Project on global climate is speculative. The appropriate context for consideration of the Proposed Project's contributions to greenhouse gases is within the cumulative impacts analysis, and this approach is consistent with the June 19, 2007 OPR Technical Advisory on this topic.

### **Land Use Equivalency Program**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Equivalency Program, there would be no

substantial variation in the Project's Conceptual Circulation Plan, building pad elevations, or the depth of excavation. The equivalency formula was designed to be traffic neutral. Potential changes in land use under the Equivalency Program would therefore have no substantial effect on the air quality analysis because the total amount of traffic would be the same. As a result, the amount and types of construction equipment operating at the Project site under peak construction activity levels would be the same for the Equivalency Program as compared to the Proposed Project, although there may be minor differences in the overall duration of construction activities due to the limited changes in the amount of development that could occur. Furthermore, the site characterization and associated remediation required for Project development would be the same under the Equivalency Program. As such, the impacts of the Equivalency Program relative to peak regional and local emissions as well as emissions of toxic air contaminants or odors during construction would be the same as those forecasted for the Proposed Project. Therefore, the Equivalency Program, as is the case with the Proposed Project, would result in significant and unavoidable impacts with regard to air quality in the construction phase.

Regional and local air quality impacts during operations under the Equivalency Program would be comparable to those of the Proposed Project as the trip generation and trip distribution characteristics of the Equivalency Program and the Proposed Project would also be comparable. Potential sources of toxic air contaminants and odors under the Equivalency Program would be the same as those associated with the Proposed Project, and, thus, impacts would be the same. Concurrent construction and operations emissions under the Equivalency Program would also be comparable to the Proposed Project as levels of construction activity and traffic would also be comparable. In addition, as is the case with the Proposed Project, the Equivalency Program would result in significant and unavoidable impacts with regard to consistency findings with adopted plans and policies.

Specifically, while there would potentially be some exchange of land uses, the Equivalency Program does not fundamentally alter the land use mix and the same Project Design Features and Mitigation Measures as those established for the Proposed Project are applicable to the Equivalency Program. Therefore, the Equivalency program, as is the case with the Proposed Project, would result in significant and unavoidable impacts with regard to the operations phase.

All Project Design Features and recommended mitigation measures to minimize air quality impacts under the Proposed Project would be implemented, as appropriate, under the Equivalency Program.

## **PROJECT DESIGN FEATURES**

The following PDFs are proposed to be incorporated into the project description and were used in the basis to formulate portions of the environmental analysis with respect to air quality impacts for the Proposed Project, including the Equivalency Program. As such, it is recommended that the lead agency incorporate the following project design features as conditions of project approval.

- PDF B-1. As part of the Proposed Project Plot Plan Review process, each builder would incorporate energy efficiency measures and other conservation measures from the Hollywood Park Sustainability Strategy Checklist contained in the Hollywood Park Specific Plan.

PDF B-2. The Proposed Project incorporates various sustainable design elements and guidelines to promote energy efficiency and other conservation measures. Some examples of the Proposed Project's sustainable design elements include:

- a new mixed-use development that integrates housing, civic, entertainment and retail amenities (jobs, parks, shopping opportunities, etc.) to help reduce vehicle miles traveled resulting from discretionary automobile trips;
- a mix of land uses that will also contribute to the overall reduction in vehicle miles traveled by promoting alternative methods of transportation and creating provisions for non-vehicular travel (e.g. pedestrian pathways and paseos, bike paths, etc.) within the project site;
- urban infill development, in central Los Angeles County, providing access to several modes of public transportation (buses, rapid transit, and light rail) for travel between neighboring cities;
- a land use plan and land use strategies that encourage higher density development along established transit corridors;
- quality housing opportunities located in a job-rich area of Los Angeles County;
- implement street improvements that are designed to relieve pressure on congested roadways and intersections (see Section IV. L. Traffic/Transportation);
- contribution to air quality improvements through the creation of shade to reduce ambient heat produced by paved surfaces by integrating an urban forest concept into the overall landscape design of the Proposed Project;
- planting trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling;
- use of a plant palette that requires low maintenance and climate appropriate plant species;
- conservation by utilization of reclaimed water sources for landscape irrigation purposes;
- natural treatment of stormwater run-off through an arroyo and lake system and in smaller pocket parks;
- using energy efficient bulbs for street lights and other electrical uses;

- creating incentives to increase recycling and reduce generation of solid waste by residential users on the Project Site;
- implementing a recycling program for waste generated by demolition and construction activities, including recycling of existing asphalt and other building materials; and
- using Energy Star appliances,

## MITIGATION MEASURES

### Construction Phase

The following mitigation measures, which are required/recommended by the SCAQMD, shall be implemented for all areas (both on-site and off-site) where construction for the Proposed Project, including the Equivalency Program would occur:

- MM B-1. Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.
- MM B-2. Track-out shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday.<sup>22</sup>
- MM B-3. A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.
- MM B-4. All haul trucks hauling soil, sand, and other loose materials off-site shall maintain at least six inches of freeboard in accordance with California Vehicle Code Section 23114.
- MM B-5. All haul trucks hauling soil, sand, and other loose materials off-site shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
- MM B-6. Traffic speeds on unpaved roads shall be limited to 15 miles per hour.
- MM B-7. Operations on unpaved surfaces shall be suspended when winds exceed 25 miles per hour.

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<sup>22</sup> Track-out is defined by the SCAQMD as any material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment (including tires) that has been released onto a paved road and can be removed by a vacuum sweeper or a broom sweeper under normal operating conditions (Rule 1156(c)(28)).



- MM B-8. Heavy-equipment operations shall be suspended during first and second stage smog alerts.
- MM B-9. On-site stock piles of debris, dirt, or rusty materials shall be covered or watered at least twice per day.
- MM B-10. Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.
- MM B-11. Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.
- MM B-12. Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site.
- MM B-13. Construction parking shall be configured to minimize traffic interference.
- MM B-14. Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours, as feasible.
- MM B-15. Architectural coatings shall be purchased from a super-compliant architectural coating manufacturer as identified by the SCAQMD ([http://www.aqmd.gov/prdas/brochures/Super-Compliant\\_AIM.pdf](http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf)).
- MM B-16. Spray equipment with high transfer efficiency, such as the electrostatic spray gun or manual coatings application (e.g., paint brush and hand roller), shall be used to reduce VOC emissions.

### **Operational Phase**

The following mitigation measures shall be implemented for all areas (both on-site and off-site) during operation of the Proposed Project, including the Equivalency Program would occur:

- MM B-17. The Applicant shall install automatic lighting on/off controls and energy-efficient lighting for office spaces.
- MM B-18. The Applicant shall provide informational packets to new residents within the development locating nearby public transportation options.

## LEVEL OF SIGNIFICANCE AFTER MITIGATION

### Construction Phase

With respect to threshold questions (b) and (d), implementation of Mitigation Measures B-1 through B-9 would ensure that fugitive dust emissions would be reduced by approximately 61 percent. Mitigation Measure B-10 would reduce heavy-duty construction equipment exhaust emissions by approximately five percent. Mitigation Measure B-15 would reduce VOC emissions during the architectural coating activity by approximately 40 percent. The other mitigation measures (Mitigation Measures B-11 through B-14 and B-16), while difficult to quantify, would also reduce construction emissions. As demonstrated in Table IV.B-13, mitigated construction regional emissions would continue to exceed the SCAQMD regional thresholds for VOC, NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, regional construction emissions would result in a significant and unavoidable air quality impact.

**Table IV.B-13**  
**Regional Construction Emissions - Mitigated**

Construction Year	Pounds Per Day					
	VOC	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>2.5</sub> <sup>a</sup>	PM <sub>10</sub> <sup>a</sup>
2009 <sup>b</sup>	68	662	328	<1	277	1,317
2010 <sup>c</sup>	48	457	234	<1	277	1,266
2011 <sup>d</sup>	98	454	338	<1	31	34
2012 <sup>e</sup>	90	421	312	<1	26	29
2013 <sup>f</sup>	58	406	341	<1	26	28
2014 <sup>g</sup>	85	233	238	<1	17	18
<b>Maximum Regional Total</b>	<b>98</b>	<b>662</b>	<b>341</b>	<b>&lt;1</b>	<b>277</b>	<b>1,317</b>
<b>SCAQMD Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>55</b>	<b>150</b>
Exceed Threshold?	Yes	Yes	No	No	Yes	Yes

<sup>a</sup> Assumes proper implementation of SCAQMD Rule 403 – Fugitive Dust.  
<sup>b</sup> Maximum Year 2009 emissions would occur when demolition, grading, and Phase I infrastructure construction activity overlap.  
<sup>c</sup> Maximum Year 2010 emissions would occur when grading and Phase I infrastructure construction activity overlap.  
<sup>d</sup> Maximum Year 2011 emissions would occur when Phase II infrastructure construction, building erection, and architectural coating activity overlap.  
<sup>e</sup> Maximum Year 2012 emissions would occur when Phase III infrastructure construction, building erection, and architectural coating activity overlap.  
<sup>f</sup> Maximum Year 2013 emissions for VOC would occur when building erection and architectural coating overlap. Maximum Year 2013 emissions for NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> would occur when Phase III infrastructure construction and building erection activity overlap.  
<sup>g</sup> Maximum Year 2014 emissions would occur when building erection and architectural coating activity overlap.  
Source: TAHA, 2008.

Results of the mitigated localized construction analysis are shown in Table IV.B-14. The dispersion modeling results indicate that localized CO emissions would be less than the SCAQMD daily significance thresholds. However, localized emissions of PM<sub>2.5</sub>, PM<sub>10</sub>, and NO<sub>2</sub> would still exceed the localized thresholds. The maximum localized emissions would be temporary and would generally occur during the

heaviest periods of construction activity. Nonetheless, localized construction emissions would result in a significant and unavoidable impact.

The diesel health risk assessment resulted in a mitigated carcinogenic risk of 28 persons in one million, which is greater than the ten persons in one million significance threshold. As such, construction-related diesel emissions would result in a significant and unavoidable temporary impact.

With respect to threshold question (e), the Proposed Project would result in a less than significant construction odor impact.

**Table IV.B-14**  
**Localized Construction Emissions - Mitigated**

Pollutant	Estimated Emissions (lbs/day)	Concentration at Nearest Sensitive Receptor	Significance Threshold	Significant Impact?
PM <sub>2.5</sub>	292	116 µg/m <sup>3</sup>	10.4 µg/m <sup>3</sup>	Yes
PM <sub>10</sub>	1,317	534 µg/m <sup>3</sup>	10.4 µg/m <sup>3</sup>	Yes
NO <sub>2</sub>	600	0.61 µg/m <sup>3</sup>	0.18 ppm	Yes
CO (One-Hour) /b/	269	3.5 ppm	20 ppm	No
CO (Eight-Hour)	269	2.6 ppm	9.0 ppm	No

<sup>a</sup> The NO<sub>2</sub> concentration includes a background concentration of 0.11 ppm.  
<sup>b</sup> The CO concentration includes one- and eight-hour background concentrations of 3.0 and 2.4 ppm, respectively.  
Source: TAHA, 2008.

### Operational Phase

With respect to threshold questions (b) and (d), Mitigation Measures B-17 and B-18 would reduce regional operational emissions for the Proposed Project and the Equivalency Program. The reduction associated with these mitigation measures is difficult to quantify. The majority of operational emissions would result from project-related mobile sources. Mobile source emissions cannot be substantially reduced through mitigation as the Applicant cannot reasonably impose mitigation measures on private vehicles. As such, regional operational emissions would result in a significant and unavoidable air quality impact.

With respect to threshold question (a), the Proposed Project and the Equivalency Program would not be consistent with the 2007 AQMP.

With respect to threshold question (e), the Proposed Project and the Equivalency Program would result in a less than significant operational odor impact.

## CUMULATIVE IMPACTS

### SCAQMD Methodology

#### *Construction*

With respect to threshold question (c), the related projects include the development of hundreds of thousands of square feet of commercial and residential uses, a number that is many times greater than the project and the Equivalency Program. As the project and the Equivalency Program results in a significant impact during construction relative to VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>, (even after mitigation) it is anticipated that related project development would also result in significant regional impacts. While SCAQMD required mitigation measures would reduce air quality impacts, it is forecasted that the construction of the related projects, in addition to the proposed project or the Equivalency Program, would result in a significant impact with regard to VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub> emissions.

#### *Operations*

With respect to threshold question (c), the SCAQMD's approach for assessing cumulative operational impacts is based on the SCAQMD's AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state CAAs. This forecast also takes into account SCAG's forecasted future regional growth. As such, the analysis of cumulative impacts focuses on determining whether the project is consistent with forecasted future regional growth. If a project is consistent with the regional population, housing and employment growth assumptions upon which the SCAQMD's AQMP is based, then future development would not impede the attainment of ambient air quality standards and a significant cumulative air quality impact would not occur. Here, the Project together with cumulative development would exceed the current growth projections for the City of Inglewood, though when the broader southern California region is considered, the projected cumulative growth is within growth expectations for the region. Nonetheless, given the technical inconsistency and the fact that the Proposed Project and the Equivalency Program would result in a significant VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub> impact during operations after mitigation, the Proposed Project and the Equivalency Program would result in a significant regional cumulative operations impact.

### Greenhouse Gas Emissions

For the purpose of this analysis, greenhouse gas emissions under the operational control of the Project Applicant associated with the Proposed Project have been identified, quantified and analyzed under the cumulative impacts discussion. These emissions are associated with increased electricity consumption, natural gas combustion and mobile source emissions due to project-generated traffic. The Proposed Project would emit an estimated additional 53,227 tons per year of CO<sub>2</sub> equivalent emissions above the existing development levels. It should be noted that although public transportation exists near the project site, no reduction was taken in the determination of the Proposed Project's vehicular trip generation forecasts and the corresponding traffic impacts. As such, it can be assumed that there would be some reduction in vehicle trips due to public transit ridership, as well as locating retail centers, civic, entertainment and recreational uses near housing; therefore, the additional estimated CO<sub>2</sub> equivalent

emissions associated with the Proposed Project would be less than estimated additional 53,227 tons per year.

Nonetheless, the Proposed Project would be a mixed-use, infill development project that is intended to minimize vehicle trips between residential and commercial uses as well as constructing additional residential units in close proximity to the jobs-rich area of Los Angeles County. The project site is located near major freeways and is well-served by public transit. The Proposed Project also incorporates “smart growth” features including creating walkable neighborhoods, providing housing near mass transit and jobs-rich area, and incorporating energy efficient appliances into the building design. Moreover, infill development reduces pressure to develop green fields such as open spaces and parkland by reclaiming under utilized sites. Infill development allows funds to be used for maintaining or upgrading existing services rather than diverting funds for expansion to new areas.

Improving energy efficiency and using renewable energy sources are effective ways to improve air quality and reduce energy consumption costs. In addition to the “smart growth” features discussed above, the Proposed Project proposes to incorporate other sustainable elements listed below as Project Design Features. Many of the sustainable Project Design Features are also provided as examples of measures to reduce GHG emissions in the OPR Technical Advisory. As discussed in Table IV.B-15, the design of the Proposed Project is generally consistent with the OPR Guidance on measures to reduce GHGs.

It is not possible at this time to quantify the exact reductions in greenhouse gas emissions anticipated from the smart growth and sustainability design features of the Proposed Project. By incorporating energy and VMT reducing project features such as designing, constructing, and operating the project to comply with Title 24, installing appliances, fixtures, and infrastructure that use less energy and water, creating approximately 25 acres of recreation/open space, and by locating housing near to mass transit and employment centers, the Proposed Project will result in lower GHG emission rates compared to current standards and practices. Given the lack of standards and the Proposed Project’s consistency with the State and City’s goals and GHG reduction measures, the contribution to the cumulative impact of global climate change is considered less than significant.

**Table IV. B-15  
Comparison of Project Characteristics to Examples of GHG Reduction Measures in OPR  
Technical Guidance**

GHG Reduction Measure	Consistency of the Proposed Project
<i>Land Use and Transportation:</i>	
Implement land use strategies to encourage jobs/housing proximity, promote transit-oriented development, and encourage high density development along transit corridors. Encourage compact, mixed-use projects, forming urban villages designed to maximize affordable housing and encourage walking, bicycling and the use of public transit systems.	The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As such, it is an infill redevelopment project and would thus be consistent with this measure. The Project Site is located near well served public transit routes, including bus lines along Century Boulevard, Prairie Avenue and Crenshaw Boulevard, in addition to Metro Green Line stations at the Hawthorn Station and Crenshaw Station. The Proposed Project, as a mixed-use community, will reduce the number of auto trips and vehicle miles traveled by placing housing

**Table IV. B-15  
Comparison of Project Characteristics to Examples of GHG Reduction Measures in OPR  
Technical Guidance**

	opportunities in close proximity to transit and jobs. The Proposed Project will also create open space, retail, entertainment, casino/gaming and civic opportunities for residents to walk and bike.
Encourage infill, redevelopment, and higher density development, whether in incorporated or unincorporated settings.	The Proposed Project is an in-fill redevelopment project, which includes higher density development, and thus is consistent with this measure.
Encourage new developments to integrate housing, civic and retail amenities (jobs, schools, parks, shopping opportunities) to help reduce VMT resulting from discretionary automobile trips.	The Proposed Project, as a mixed-use community, will reduce the number of auto trips and vehicle miles traveled by placing housing opportunities in close proximity to transit and jobs. The Proposed Project will also create open space, retail, entertainment, casino/gaming and civic opportunities for residents to walk and bike.
Apply advanced technology systems and management strategies to improve operational efficiency of transportation systems and movement of people, goods and services.	The Proposed Project proposes, as its primary mitigation strategy for impacts to traffic and transportation, a funding contribution to continue development and enhancement of the City's Intelligent Transportation System (ITS). The ITS system will enhance the ability of the traffic signal controller to adjust traffic signal timing and intersections on a real-time basis and synchronize traffic signals along key roadways in response to changing traffic volume patterns. The ITS system has been shown to increase the effective intersection capacity by at least 10% and will improve the operational efficiency of the movement of people, goods and services.
Incorporate features into project design that would accommodate the supply of frequent, reliable and convenient public transit.	The Proposed Project intends to make bus shelter improvements along its Century Boulevard frontage to better accommodate the existing public transit available near the Project Site.
Implement street improvements that are designed to relieve pressure on a region's most congested roadways and intersections.	As noted above, the Proposed Project proposes a funding contribution to the City's ITS system to help relieve pressure on some of the City's most congested roadways and intersections.
Limit idling time for commercial vehicles, including delivery and construction vehicles.	With adherence to Mitigation Measure B-12, the Proposed Project would be consistent with this GHG reduction measure.
<b>Urban Forestry:</b>	
Plant trees and vegetation near structures to shade buildings and reduce energy requirements for heating/cooling.	As provided in the Hollywood Park Specific Plan, the Proposed Project includes an urban forest concept by allowing for the extensive planting of street trees, parkway and landscape setbacks. A majority of the tree species have been carefully selected from the City's approved tree list, and the other selected trees were based on recommendations from local arborists to create a palette of horticultural successful, low maintenance and climate-appropriate tree species.
<b>Green Buildings:</b>	

**Table IV. B-15  
Comparison of Project Characteristics to Examples of GHG Reduction Measures in OPR  
Technical Guidance**

Encourage public and private construction of LEED (Leadership in Energy and Environmental Design) certified (or equivalent) buildings.	The buildings that are part of the Proposed Project are not currently proposed to be LEED certified. However, as part of the Proposed Project Plot Plan Review process, each builder would incorporate energy efficiency and other conservation measures from the Hollywood Park Sustainability Checklist contained in the Specific Plan. See PDF B-1.
<b><i>Energy Conservation Policies and Actions:</i></b>	
Recognize and promote energy saving measures beyond Title 24 requirements for residential and commercial projects.	As discussed above, as part of the Proposed Project Plot Plan Review process, each builder would incorporate energy efficiency and other conservation measures from the Hollywood Park Sustainability Checklist contained in the Specific Plan. See PDF B-1.
Where feasible, include in new buildings facilities to support the use of low/zero carbon fueled vehicles, such as the charging of electric vehicles from green electricity sources.	The Proposed Project does not propose this GHG reduction measure.
Educate the public, schools, other jurisdictions, professional associations, business and industry about reducing GHG emissions.	This GHG reduction measure is not applicable to the Proposed Project.
Replace traffic lights, street lights, and other electrical uses to energy efficient bulbs and appliances.	The Proposed Project would use energy efficient bulbs and appliances where applicable as feasible.
Purchase Energy Star equipment and appliances for public agency use.	This GHG reduction measure is not applicable to the Proposed Project. However, the Proposed Project would include Energy Star appliances for the residential dwelling units.
Incorporate on-site renewable energy production, including installation of photovoltaic cells or other solar options.	This GHG reduction measure is not applicable to the Proposed Project.
Execute an Energy Savings Performance Contract with a private entity to retrofit public buildings. This type of contract allows the private entity to fund all energy improvements in exchange for a share of the energy savings over a period of time.	This GHG reduction measure is not applicable to the Proposed Project.
Design, build, and operate schools that meet the Collaborative for High Performance Schools (CHPS) best practices.	This GHG reduction measure is not applicable to the Proposed Project.
Retrofit municipal water and wastewater systems with energy efficient motors, pumps and other equipment, and recover wastewater treatment methane for energy production.	This GHG reduction measure is not applicable to the Proposed Project.
Convert landfill gas into energy sources for use in fueling vehicles, operating equipment, and heating buildings.	This GHG reduction measure is not applicable to the Proposed Project.

**Table IV. B-15  
Comparison of Project Characteristics to Examples of GHG Reduction Measures in OPR  
Technical Guidance**

Purchase government vehicles and buses that use alternatives fuels or technology, such as electric hybrids, biodiesel, and ethanol. Where feasible, require fleet vehicles to be low emission vehicles. Promote the use of these vehicles in the general community.	This GHG reduction measure is not applicable to the Proposed Project.
Offer government incentives to private businesses for developing buildings with energy and water efficient features and recycled materials. The incentives can include expedited plan checks and reduced permit fees.	This GHG reduction measure is not applicable to the Proposed Project.
Offer rebates and low-interest loans to residents that make energy-saving improvements on their homes.	This GHG reduction measure is not applicable to the Proposed Project.
Create bicycle lanes and walking paths directed to the location of schools, parks and other destination points.	The Hollywood Park Specific Plan provides a safe and efficient network of roadways, providing for pedestrian trail systems and bicycle circulation in conjunction with the street network. A hierarchy of bicycle connections is incorporated throughout the development to encourage the use of walking, jogging and bicycling as a means of accessing the various land uses on the Project Site, including the civic site, parks, retail, office/commercial, entertainment and casino/gaming.
<b><i>Programs to Reduce Vehicle Miles Traveled:</i></b>	
Offer government employees financial incentives to carpool, use public transportation, or use other modes of travel for daily commutes.	This GHG reduction measure is not applicable to the Proposed Project. However, as part of the proposed circulation plan, the Proposed Project will incorporate a Transportation Demand (TDM) Strategy to be implemented as part of the Mitigation and Monitoring Reporting Program. The TDM would provide incentives for those visiting the site to use alternative modes of transportation or use of carpools to reduce VMT. (See Section IV. L. Traffic and Transportation).
Encourage large businesses to develop commute trip reduction plans that encourage employees who commute alone to consider alternative transportation modes.	As discussed above, the Proposed Project will incorporate a TDM Strategy to help reduce VMT to the Project Site. The TDM will be finalized in conjunction with the project approval process.
Develop shuttle systems around business district parking garages to reduce congestion and create shorter commutes.	As discussed above, the Proposed Project will incorporate a TDM Strategy to help reduce VMT to the Project Site. The TDM will be finalized in conjunction with the project approval process.
Create an online ridesharing program that matches potential carpoolers immediately through email.	As discussed above, the Proposed Project will incorporate a TDM Strategy to help reduce VMT to the Project Site. The TDM will be finalized in conjunction with the project approval process.
Develop a Safe Routes to School program that allows and promotes bicycling and walking to school.	As discussed above, the Proposed Project will incorporate a TDM Strategy to help reduce VMT to the Project Site. The TDM will be finalized in conjunction with the project approval process.



**Table IV. B-15**  
**Comparison of Project Characteristics to Examples of GHG Reduction Measures in OPR**  
**Technical Guidance**

<i>Programs to Reduce Solid Waste:</i>	
Create incentives to increase recycling and reduce generation of solid waste by residential users.	The Proposed Project shall follow all applicable City of Inglewood policies related to curbside collection and recycling programs.
Implement a Construction and Demolition Waste Recycling Ordinance to reduce the solid waste created by new development.	This GHG reduction measure is not applicable to the Proposed Project. However, 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. (See PDF J.4-1)
Add residential/commercial food waste collection to existing greenwaste collection programs.	The Proposed Project shall follow all applicable City of Inglewood policies related to curbside collection and recycling programs.
<i>Source: Christopher A. Joseph &amp; Associates.</i>	

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### C. GEOLOGY/SOILS

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Unless otherwise noted, the following section summarizes the findings and conclusions as presented in the following:

- Final Report – Geologic Investigation of The Potrero Fault, Hollywood Park, Inglewood, California, Geomatrix Consultants, Inc., dated November 2005 (“Geomatrix 2005 Final Report”), and is included as Appendix C-1 to this Draft EIR;
- Memorandum re: Clarification of Points on Final Report – Geologic Investigation of the Portero Fault for Hollywood Park (Inglewood, CA) Project No. 10834, Geomatrix Consultants, Inc., dated July 5, 2007 (“Geomatrix 2007 Memorandum re Final Report”), and is included as Appendix C-1 to this Draft EIR;
- Geotechnical Evaluation for Environmental Impact Report, Proposed Residential and Commercial Development, Hollywood Park Redevelopment, Inglewood, California, Group Delta Consultants, dated March 29, 2007 (the “Geotechnical Report”), and is included as Appendix C-2 to this Draft EIR.

#### ENVIRONMENTAL SETTING

The Project Site is the Hollywood Park Racetrack and Casino property located at 1050 South Prairie Avenue in Inglewood California. The approximate 238-acre Project Site is bounded on the north by a parking lot, vacant commercial/recreational property, the recent Renaissance residential development and Darby Park. One-story and two-story residential structures are located across 90<sup>th</sup> Street, to the north. One and two-story residential uses are to the east. Century Boulevard is to the south, with one- and two-story commercial retail and restaurant uses along this frontage. One- and two-story commercial retail and restaurant uses are located immediately west of the Project Site across Prairie Avenue.

#### Geologic Conditions and Topography

The Project Site is located within the Rosecrans Hills physiographic region of Los Angeles County. It is located within the west Los Angeles shelf and is underlain by older alluvial deposits derived from the highlands to the north, generally consisting of interbedded layers of sands, gravels, silts and clays. To the north and to the west of the site, the subsurface soils consist of elevated terrace deposits, dominated by reddish-brown continental derived sands. The site is located north of the Baldwin Hills and on the west flanks of the Potrero Hills. These hills are the result of folding along the Newport Inglewood Fault Zone (NIFZ) during seismic and/or aseismic events, which formed domes that have trapped large accumulations of oil and gas. In general, the average surface topography of the Project Site rises across

the property from the southwest Parking Area (approximately 106 feet above mean sea level [msl]) to the northeast Stables Area (approximately 150 feet above msl).<sup>1</sup> (See Figure IV.C-1, U.S.G.S Quadrangle Vicinity Map).

### Subsurface Soil Conditions

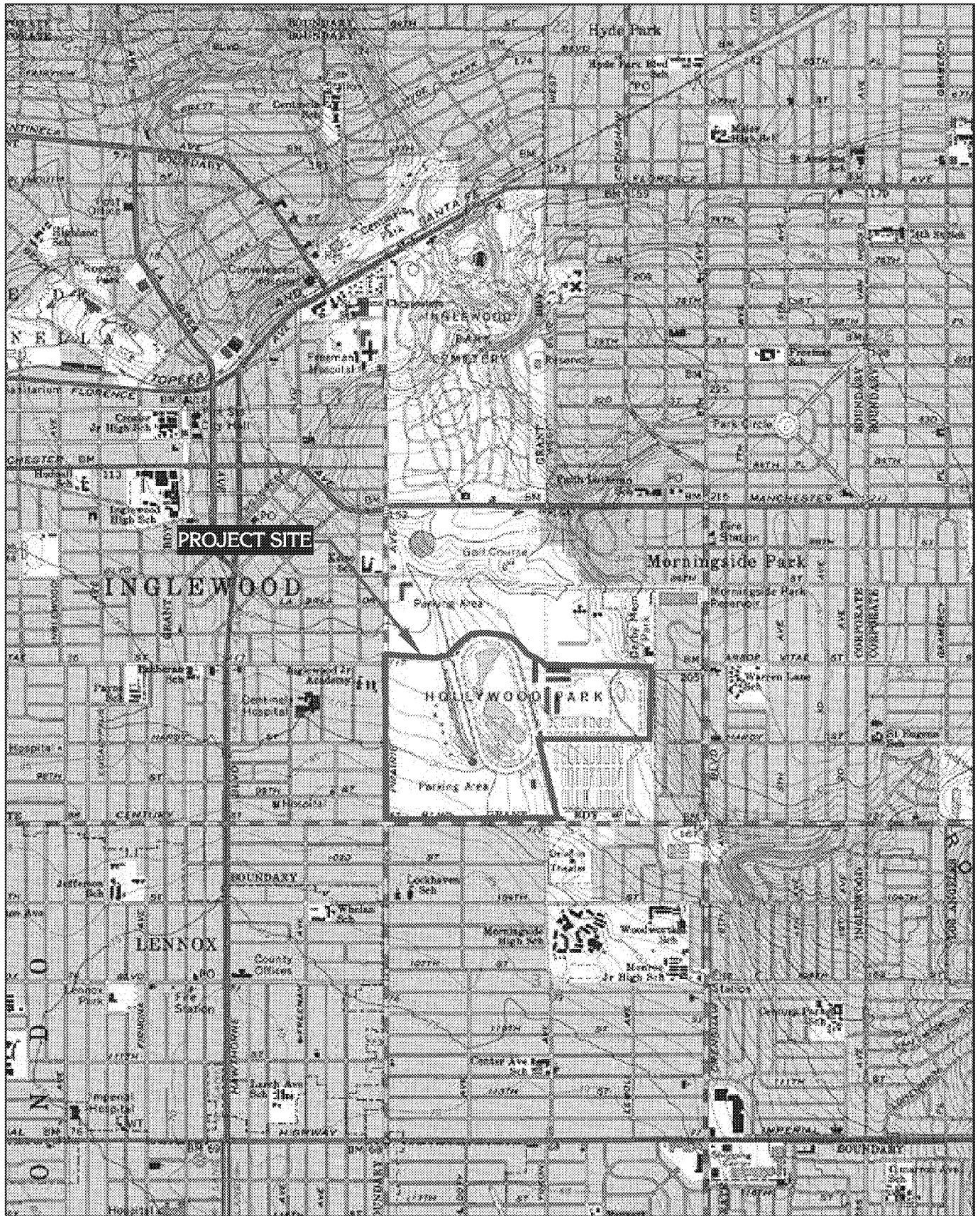
The Project Site is located north of the Baldwin Hills on the west flanks of the Potrero Hills. Ground surface and subsurface conditions on the site are characterized as follows. The west portion of the Project Site is currently used as asphalt paved parking lots. The surface elevation within the west portion of the Project Site ranges from 120 to 92 feet above msl (north to south). The middle portion of the Project Site is currently improved with the Grandstands and the horse racing track (i.e. "Main Track"). The surface elevation within this middle portion of the site ranges from 120 to 125 feet above msl. Previous soils reports reviewed by Group Delta Consultants revealed that the south portion of the Main Track was extended to its current limits by placing 24-foot of compacted fill (90% of relative compaction). However, the exact division of the extended track could not be delineated. The east portion of the site is currently used as stables. The Training Track is located to the east of the Main Track close to the east property line. The surface elevation of the east portion of the Project Site ranges from 137 to 152 feet above msl. A 10- to 20-foot high cut slope exists between the Main Track and the stable area, running north to south. An artificial lake exists in the middle of the Main Track. A 7-story high grandstand, a club house and a Casino are located west of the Main Track. These structures are supported on 20- to 40-foot deep reinforced concrete caisson foundations.

Subsurface conditions were evaluated by Group Delta Consultants, Inc., between September 18, 2006 and October 5, 2006 by drilling 11 borings on the Project Site to depths of 51.0 to 76.5 feet below ground surface (bgs).<sup>2</sup> Figure IV.C-2 on page IV.C-4 shows the locations of borings B-1 through B-11. Based on past site usage, current site grade, and soil condition encountered during field explorations, the Project Site was divided into three areas: (1) the "Parking Area" on the west; (2) the "Track Area" in the middle; and, (3) the "Barn Area" on the east side. In general, the subject site is underlain by interbedded silty clay

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<sup>1</sup> Group Delta Consultants, Geotechnical Evaluation for Environmental Impact Report, Proposed Residential and Commercial Development, Hollywood Park Redevelopment, Inglewood, California, March 29, 2007 (See Table 5).

<sup>2</sup> Borings were drilled to depths ranging from 51.0 to 76.5 feet bgs. The Cone Penetration Test (CPT) soundings were advanced to depths ranging from 22.5 to 75.5 feet bgs. A summary of field exploration data is provided in Table A-1 of Appendix A to Appendix C-1 of this EIR. Both relatively undisturbed samples and Standard Penetration Tests (SPT) samples were taken in the borings. The explorations were performed under the continuous technical supervision of Group Delta's field engineer, who also maintained detailed logs of the soil encountered, classified the materials, and assisted in obtaining soil samples. Details of the field exploration program, including copies of the boring logs and CPT interpretations, are presented in Appendix A to Appendix C-1 of this EIR.

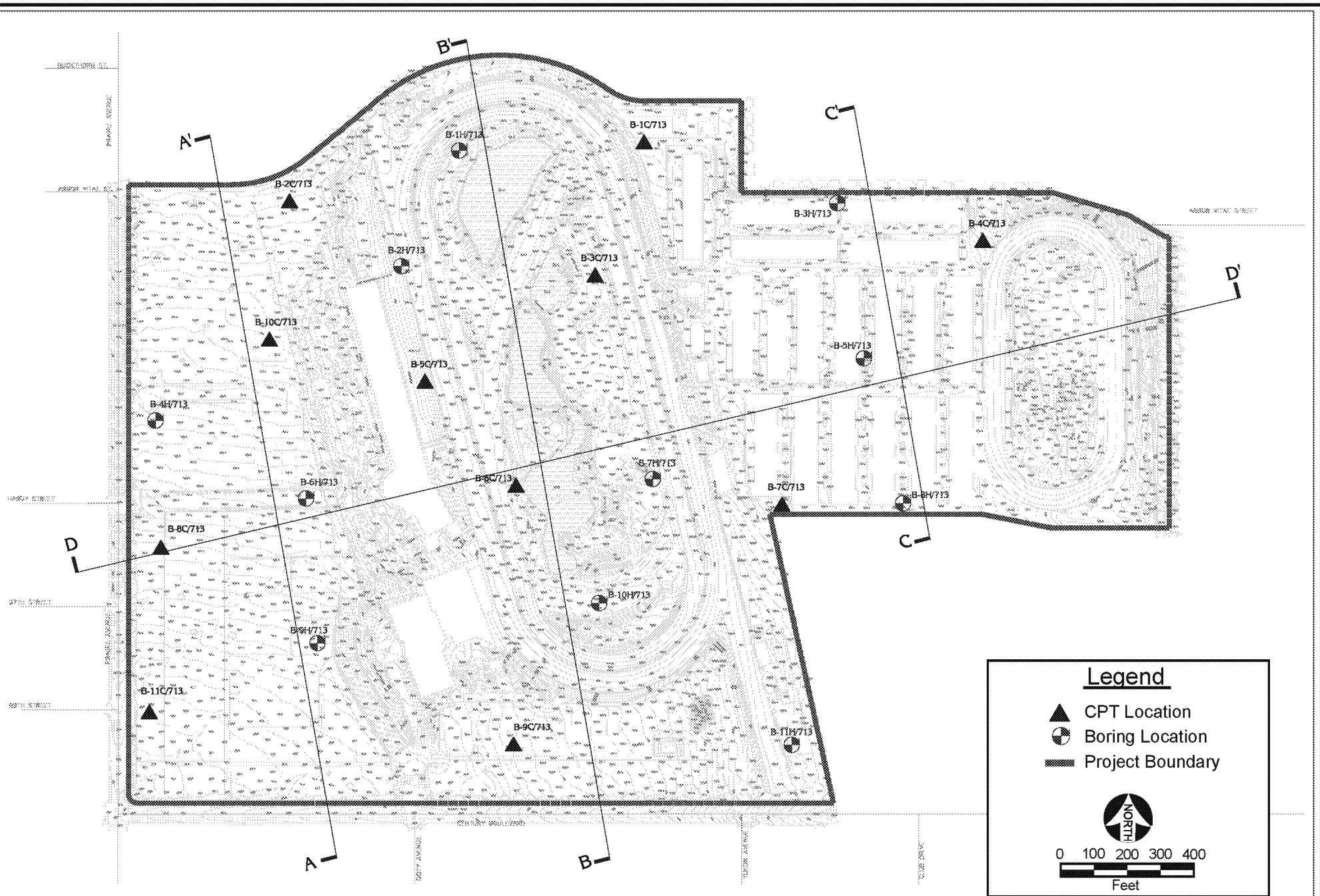


Source: Group Delta Consultants Inc., 11/30/06.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
 Environmental Planning and Research

Figure IV.C-1  
 USGS Quadrangle Vicinity Map



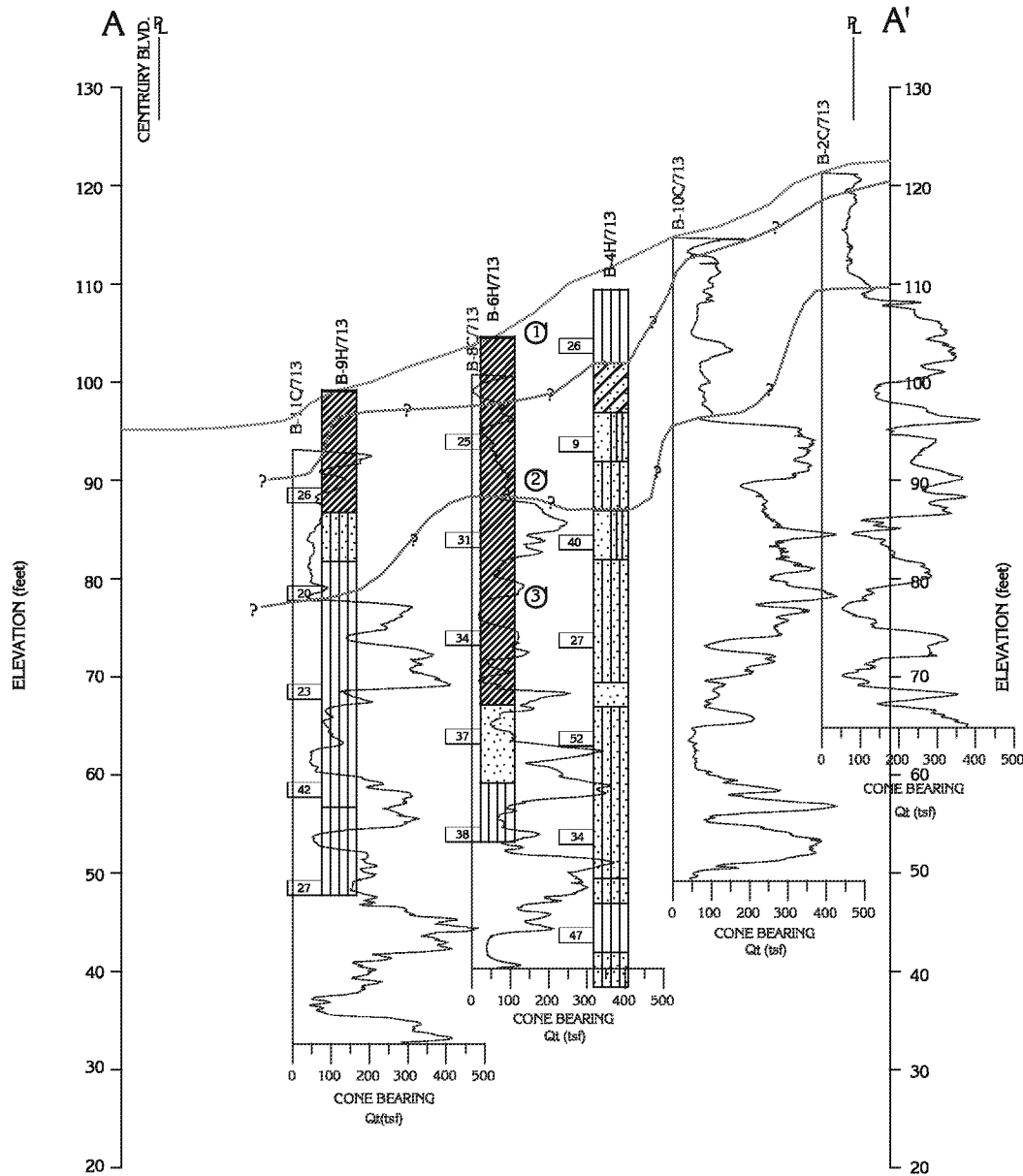
Source: Group Delta Consultants, Inc., 12/11/06.

and fine grained silty sand. Generalized geotechnical cross-sections through the existing site (Cross-Section A-A' through C-C') are presented in Figure IV.C-3 through Figure IV.C-5. Detailed soil layering for these three areas is discussed below.

The subsurface soils at the Parking Area consist of materials that are presumed to be fill, as well as stiff clay and dense sand. As depicted in Figure IV.C-3, Cross-Section of Geologic/Hydrologic Boring A-A', soils encountered during borings drilled within the Parking Area are characterized in three distinct layers. The first of the three layers is presumed to be fill, and was encountered during the field exploration at depths of 3 to 7 feet bgs. The fill consists predominantly of clay and silt with sand. Based on the spacing distance between exploration locations (approximately 600 feet), Group Delta Consultants concluded that old fill could exist anywhere on the site, and could be locally deeper. The second of the three soil layers encountered at the Parking Area is stiff clay and silt with sand. This layer is about 10- to 15-feet thick, extending from the bottom of the fill layer to depths between approximately 78 and 108 feet above msl (south to north across Parking Area ). The third of the three soil layers is dense sand, stiff clay and silt. This layer extends to the maximum depth of 75 feet bgs explored. The soils in this layer consist predominantly of interbedded layers of sand, silty clay and silts. The sand is in general described as dense and very dense.

The subsurface soils at the Main Track and adjacent areas consist of materials that are presumed to be fill, soft clay, underlain by stiff clay and dense sand. As depicted in Figure IV.C-4, Cross-Section of Geologic/Hydrologic Boring B-B', soils encountered during borings drilled within the Main Track are also characterized in three distinct layers. The first of the three layers is presumed to be fill, and was encountered during the field exploration at depths up to 7.5 feet bgs. The fill consists predominantly of clay, silt and clayey sand. The south portion of the Main Track was extended to its present limit in the early 1980's. At that time, 24 feet of fill was placed for the track extension. Based on research, fill materials were also noted by Group Delta Consultants to have been encountered during the 1983 field exploration completed for the Grandstand and Casino to a maximum depth of 28 feet bgs. As such, Group Delta Consultants noted the possibility of old fill to exist anywhere on the site, and that it could be locally deeper. The second of the three soil layers encountered at the Main Track is soft clay and silt with sand. This layer is about 15- to 20-foot thick, extending from the bottom of uncertified fill, to depths between approximately 98 and 105 feet above msl (south to north). This layer is in general described as soft and firm. The third of the three soil layers is dense sand, stiff clay and silt. This layer extends from the bottom of the second layer to the maximum explored depth of 75 feet bgs. The soils in this third layer consist predominantly of interbedded layers of sand, silty clay and silts. The sand is in general described as dense and very dense. The silty clay and silts are in general described as stiff and very stiff.

The subsurface soils at the Barn Area consist predominantly of material presumed to be fill, as well as stiff clay and dense sand. As depicted in Figure IV.C-5, Cross-Section of Geologic/Hydrologic Boring C-C', soils encountered during borings drilled within the Barn Area are characterized in two distinct layers. The first is presumed to be fill, and was encountered during the field exploration at depths of up to 4.5 feet bgs. The fill consists predominantly of silty clay and clayey silt with sand. Based on research, fill materials



## Legend

18 Standard Penetration Test (SPT) N-Value

Interpreted Layer Boundary

## NOTES:

1. Refer to Figure 2 for location of cross sections.

2. The discussion in the text of the report is necessary for a proper understanding of the nature of subsurface conditions.

3. The cross section is based on geologic interpretation of conditions encountered at exploration locations.

Actual conditions may vary between explorations.

## SOIL LAYERS

- ① Likely Fill
- ② Stiff Clay with Sand
- ③ Interbedded dense Sand with stiff Clay

## SCALE (feet)

V: 1" = 20'

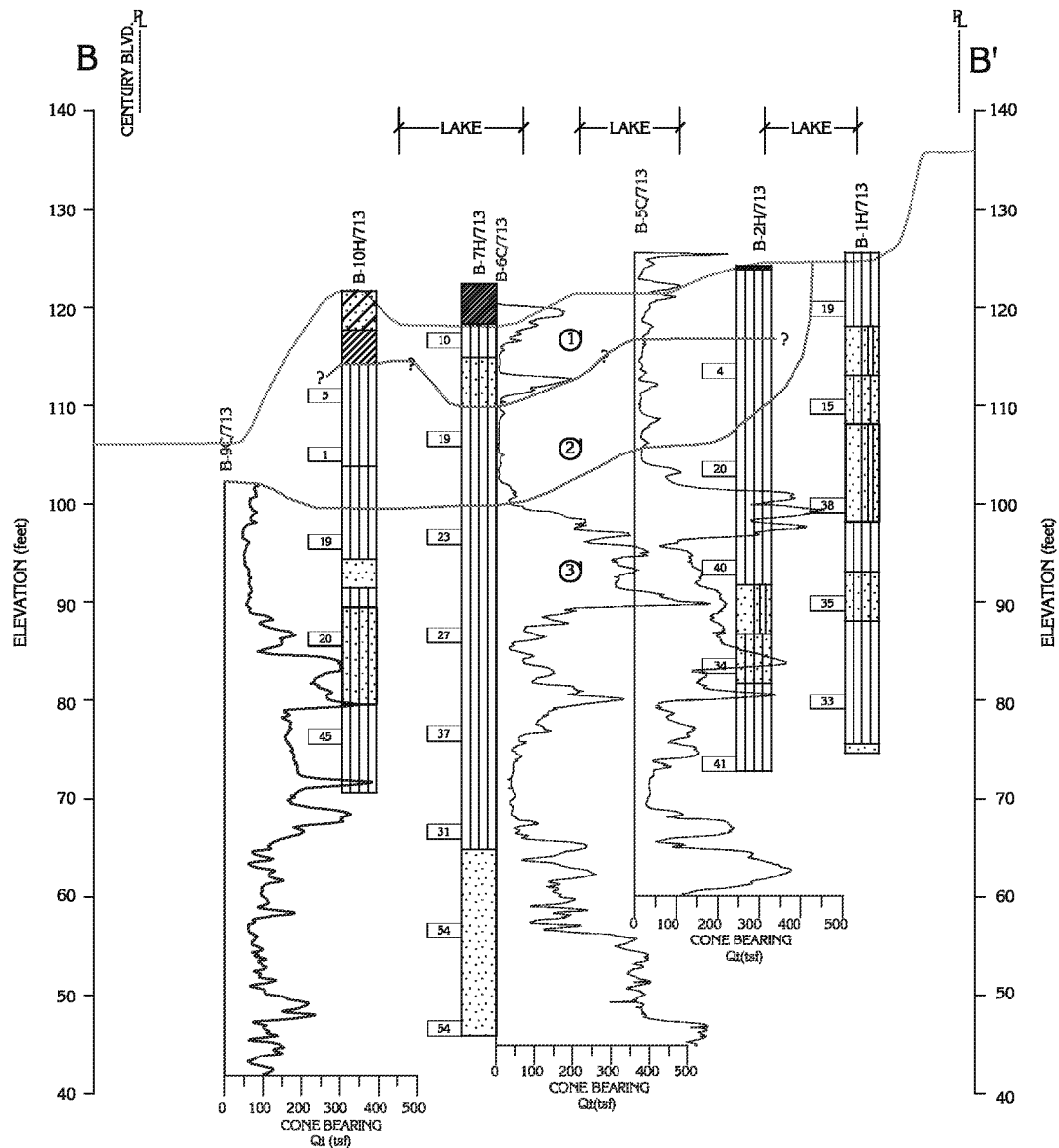
H: 1" = Approx. 760'

Source: Group Delta Consultants Inc., 12/04/06.



CHRISTOPHER A. JOSEPH & ASSOCIATES  
Environmental Planning and Research

Figure IV.C-3  
Cross-Section of Geologic/Hydrologic Boring A-A'



### Legend

18 Standard Penetration Test (SPT) N-Value

### NOTES:

1. Refer to Fig. 2 for location of cross sections.
2. The discussion in the text of the report is necessary for a proper understanding of the nature of subsurface conditions.
3. The cross section is based on geologic interpretation of conditions encountered at exploration locations. Actual conditions may vary between explorations.

### SOIL LAYERS

- ① Likely Fill
- ② Soft Clay
- ③ Interbedded dense Sand with Clay

### SCALE (feet)

V: 1" = 20'

H: 1" = Approx. 760'

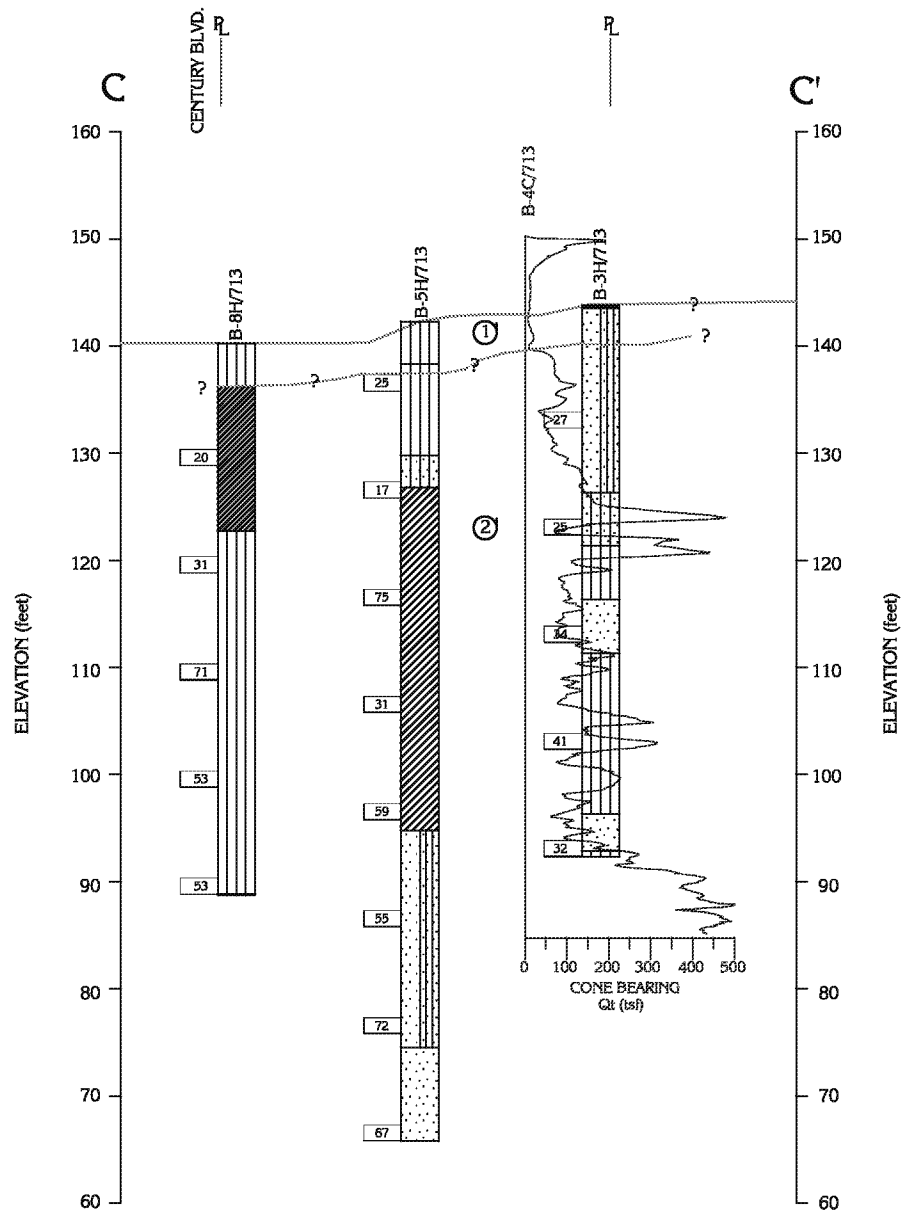
Source: Group Delta Consultants Inc., 12/04/06.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

Figure IV.C-4  
Cross-Section of Geologic/Hydrologic Boring B-B'





### Legend

18 Standard Penetration Test (SPT) N-Value

### NOTES:

1. Refer to Figure 2 for location of cross sections.
2. The discussion in the text of the report is necessary for a proper understanding of the nature of subsurface conditions.
3. The cross section is based on geologic interpretation of conditions encountered at exploration locations. Actual conditions may vary between explorations.

### SOIL LAYERS

- ① Likely Fill
- ② Stiff Clay interbedded with Sand

### SCALE (feet)

V: 1" = 20'

H: 1" = Approx. 760'

Source: Group Delta Consultants Inc., 12/04/06.

were noted by Group Delta Consultants to have been encountered at depths between approximately 4 to 7 feet bgs during the 1974 and 1991 field explorations for individual stables. As such, Group Delta Consultants noted the possibility of old fill to exist anywhere on the site, and that it could be locally deeper. The second layer of soil at the Barn Area is silty clay and clayey silts with sand. This layer extends from the bottom of the second layer to the maximum explored depth of 75 feet bgs. The clay is generally described as very stiff to hard. At a depth of 50 feet bgs, a very dense sand layer was encountered in some of the exploration locations. Porous material was also encountered in Group Delta Consultants field exploration in the Barn Area. Soil samples taken at depths between 0 and 5 feet bgs showed a collapse potential of up to 5%. One sample at 9 to 10 feet bgs showed a collapse potential of 3%. Group Delta Consultants noted that a collapse potential could exist in the Barn Area soils, which would need to be evaluated in building specific site investigations.

Representative samples of the near surface soils were collected and tested to identify their expansive characteristics and soil corrosivity. The testing results indicated that the near surface soils have low to medium expansion potential. Consolidation tests at 30 and 40 feet in B-5H/713, 5 feet in B-6H/713, 40 feet in B-7H/713, and 5 feet in B-10H/713, as shown in Figure IV.C-2, show signs of expansion (0.2 to 1.4 percent). These shallow on site soils will be mixed during grading activity. On the basis of the laboratory testing, the samples are classified as having a moderate to severe corrosion potential for buried metals.

## Groundwater

The Project Site is located within the West Coast Groundwater Basin. Groundwater was not encountered during Group Delta Consultants field explorations to the maximum depth of 75 feet explored. According to reports published by the State of California Division of Mines and Geology, the shallowest historic groundwater level is deeper than 50 feet below existing grade. However, it is possible that locally perched groundwater could be encountered near and beneath the existing lake in the center of the Main Track. Groundwater level information reported by Group Delta Consultants is supplemented by the EKI, Inc.'s investigations in 2006, as presented in Section IV.D. Hazardous Materials/Risk of Upset, which encountered groundwater at depths ranging from approximately 70 bgs in the southwestern corner of the Property to approximately 115 to 180 bgs in the remainder of the Property. Other averaged groundwater elevations observed during July 2005 investigations by EKI, Inc. on the Project Site ranged between 95 feet bgs in the Parking Area, to 123 feet bgs in the Main Track Area, to 170 feet bgs in the Stables Area.<sup>3</sup> (See also Section IV.F, Hydrology/Water Quality).

The abrupt change in groundwater elevations on the Project Site may be due to the occurrence of faults in the subsurface that influence groundwater flow. In the northeast portion of the Project Site, the calculated groundwater gradient appears to trend to the southwest, which is not consistent with the previously

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<sup>3</sup> EKI, 2007. *Soil Management Plan, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., July 3, 2007.*

reported predominant southeasterly groundwater gradient direction for this area. It is possible that the estimated southwesterly groundwater gradient direction is limited in extent (i.e., the gradient shifts to a more southeasterly direction south of the stables) or is not generally representative of groundwater gradient directions measured at other times of the year. (EKI, 2007).

### **Liquefaction**

Liquefaction involves the sudden loss in strength of a saturated, cohesionless soil (predominantly sand) caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in pore water pressure can temporarily transform the soil into a fluid mass, resulting in vertical settlement, and can also cause lateral ground deformations. Typically, liquefaction occurs in areas where there are loose sands and the depth to groundwater is less than 50 feet from the surface. Seismic shaking can also cause soil compaction and ground settlement without liquefaction occurring, including settlement of dry sands above the water table.

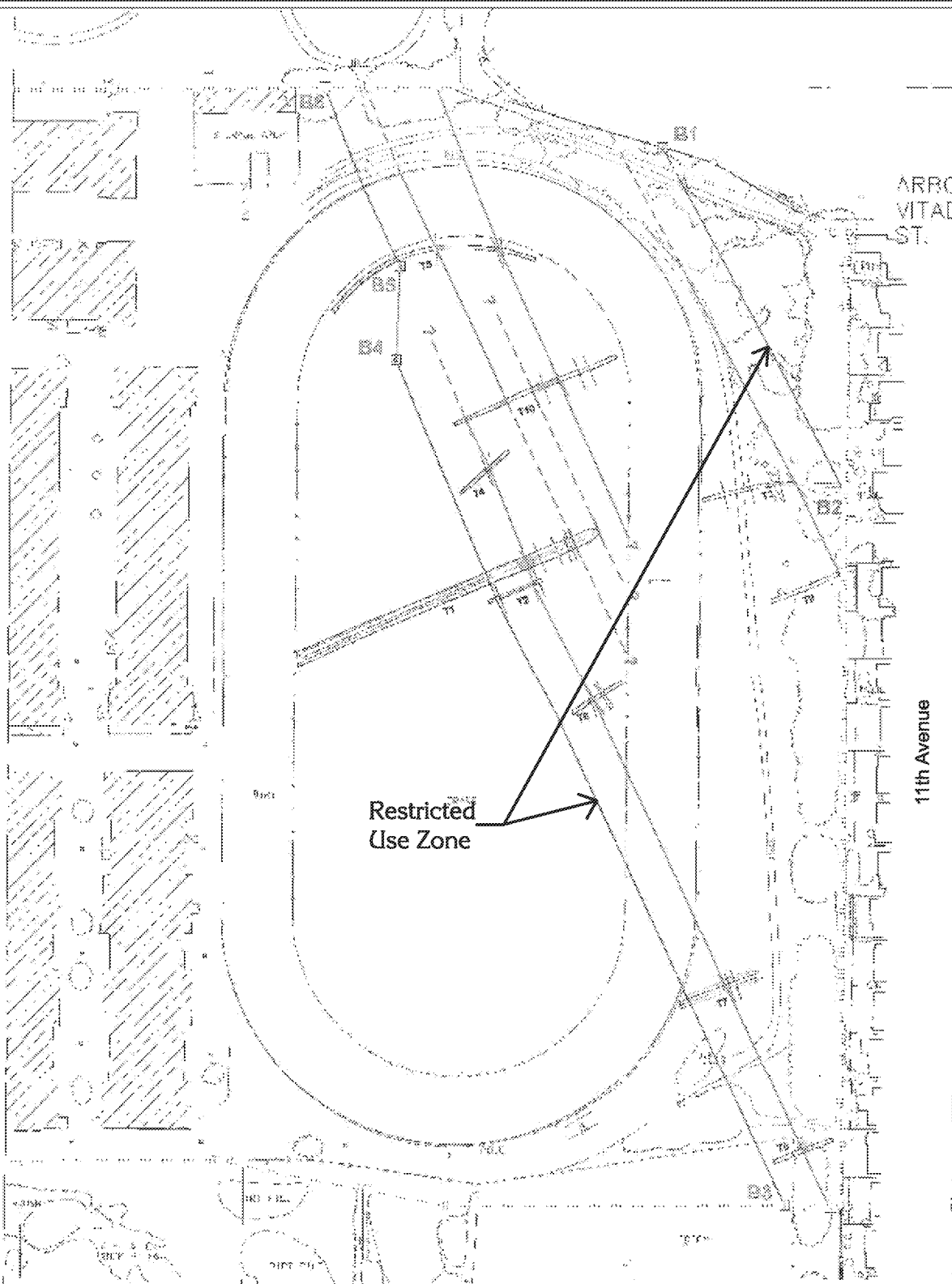
The Project Site is not located within a State of California Liquefaction Hazard Zone (CDMG 1998). As stated above, groundwater was not encountered in any of the borings, which extended to a maximum depth of 75 feet. However, groundwater was encountered at depths ranging from approximately 70 to 180 feet below ground surface (bgs) by EKI Inc., during their groundwater and soils investigations discussed in Section IV.D, Hazardous Materials/Risk of Upset. The historical shallow ground water level at the site is deeper than 50 feet. Therefore, the potential for liquefaction, lateral spreading, and seismic compaction to occur at the site is considered to be remote.

### **Seismic Conditions**

The entire Southern California area is considered to be a seismically active region. The region has numerous active, potentially active, and inactive faults based on criteria developed by California Geological Survey. An active fault is defined as a fault that has had a surface displacement within Holocene times (about the last 11,000 years). A potentially active fault is a fault that has demonstrated surface displacement of Quaternary age deposits (within the last 1.6 million years). Potentially active faults and their associated Special Study Zones have been mapped by the state of California Department of Conservation (California Geologic Survey - formerly the California Division of Mines and Geology). Published maps indicated that the northeast portion of the Project Site is traversed by an Alquist-Priolo Special Studies Zone (See Figure IV.C-6).

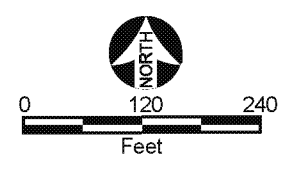
The Potrero fault, a strand of the Newport-Inglewood fault zone, crosses a portion of the Project Site and is considered to be an active fault. A fault trenching program was conducted by Geomatrix (2005) to investigate the boundaries of the Potrero Fault within the Project Site. To identify the boundaries of the Potrero fault across the Project Site, Geomatrix delineated a Restricted Use Zone (RUZ) based on the conclusions of the fault trenching program. This RUZ is located across the northeastern portion of the Training Track, as shown in Figure IV.C-7. The alignment of the RUZ is located approximately 300 feet further to the northeast than the alignment of the fault zone boundary shown on the Alquist-Priolo Special Studies Zone Maps (Inglewood Quadrangle). This finding of a northeasterly shift in the alignment of the





**EXPLANATION**

	Main faults		Trench 10
	Minor faults and fractures		50 ft. of trench
	Zone of closely spaced faults and fractures		Restricted Use Zone (RUZ) Area = 110,500 sq. ft.
			B1 / Boundary Control, per AS See Table 1



Source: Group Delta Consultants Inc., 12/20/06.

fault zone boundary was also concluded by Kenneth Osborne and Associates in their 1989 geotechnical report prepared for the Renaissance residential project (located immediately to the north of the Training Track). Specifically, Osborne concluded on page 9 of this report that “(t)he fault zone... occurs about 120 feet northeast of previously mapped traces (Poland and others, 1959; and Bryant, 1988).”<sup>4</sup>

Published historical records suggested that a second unnamed fault, the inferred Inglewood (Townsite) trace, crossed the southwest portion of the Project Site. The Inglewood (Townsite) trace near the Hollywood Park property was identified as a fault requiring investigation in the original zoning map in 1976 (as mapped by the California Geological Survey).<sup>5</sup> In 1985, the California Geological Survey reevaluated published and unpublished data on the trace. The Fault Evaluation Report 173 (FER 173) concluded that the most current available geological and geophysical evidence did not support the designation of the Inglewood (Townsite) trace as "sufficiently active" to be included on the zoning map. Therefore, the Townsite trace is not included on the current Alquist-Priolo Earthquake Fault Zone Map (Official Revised Map; CGS, 1986), and is not the subject of a Restricted Use Zone. For further discussion see the Geomatrix 2007 Memorandum re Final Report, included in Appendix C-1 to this Draft EIR.

## ENVIRONMENTAL IMPACTS

### Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact to geology and soils may occur if the Proposed Project would result in any of the following conditions:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or based on other substantial evidence of a known fault?
  - ii) Strong seismic ground shaking?
  - iii) Seismic-related ground failure, including liquefaction?
  - iv) Landslides?
- b) Result in substantial soil erosion or the loss of topsoil?

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<sup>4</sup> *Kenneth G. Osborne & Associates, Fault Location Investigation 37.5 Acre Site South of 90<sup>th</sup> Street and west of Darby Park, Inglewood, California, March 13, 1989.*

<sup>5</sup> *Formerly known as the “California Division of Mines and Geology.”*

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

### **Impacts Determined to be Less Than Significant**

As discussed in the Initial Study (see Appendix A), the Proposed Project would have no impact with respect to Threshold (e) listed above. As such, no further analysis of this topic is required.

### **Project Impacts**

Based on a review of available information, results of on-site explorations, and laboratory testing and analyses, the Geotechnical Report concluded that the Proposed Project is feasible from a geotechnical perspective. At this stage, architectural and structural details of the proposed construction are not known. When detailed building plans have been developed, additional explorations, testing, and analyses will be required in order to develop building-specific foundation recommendations. Following is a discussion of the Proposed Project's impacts during construction and operation with respect to Geology/Soils. Specific areas that are discussed include seismic hazards, erosion and topsoil, geologic hazards, and groundwater.

### ***Seismic Hazards***

#### ***Fault Rupture***

The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Inglewood. The Potrero Fault is an active surface fault trace that crosses a portion of the Proposed Project Site. It has been identified by the State and delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. The fault trenching program conducted by Geomatrix included mapping a RUZ for the Potrero Fault, which crosses the northeastern most portion of the Proposed Project. Therefore, the possibility of surface fault rupture affecting the proposed development exists. However, the Proposed Project would include development of open space and recreational areas within the RUZ, consistent with the recommendations of the Geomatrix report which identify the RUZ area as unsuitable for the construction of most structures for human occupancy, but useable for construction of recreational type development (e.g., storage facilities, recreational facilities, greenbelts, parking areas and roads). Structures intended for human occupancy, as further explained in the Geomatrix 2007 Memorandum re Final Report included in Appendix C-1 to this Draft EIR, are not proposed within the

mapped RUZ area. In the Geomatrix 2007 Memorandum re Final Report, Geomatrix stated that the following uses/facilities/structures are suitable in the RUZ:

- Swimming pool and Jacuzzi
- Tot lots
- Picnic facilities
- Meditation gardens
- Children's playground
- Fireplace and lounge areas
- Dog parks
- Exercise stations (parcourse)
- Parking spaces at ground level (including covered parking)
- Utility routes, both above and below ground
- Tennis courts, basketball courts, soccer fields and other open sports fields (volleyball courts, football play areas, etc.)
- Game tables and seating areas in the open
- Restrooms, locker rooms, changing rooms (e.g., pool cabana)
- Pool equipment rooms
- Storage lockers
- Covered walkways (e.g. pergola and trellis)
- Fences
- Retaining walls

Any suitable structures placed within the RUZ would be required to incorporate appropriate engineering design to mitigate movement resulting from potential future displacement related to the Potrero Fault. In addition, the Geomatrix 2005 Final Report concluded that the western part of the RUZ is outside the zone of deformation associated with the Potrero Fault Zone, and that the potential for surface fault rupture to the west of the RUZ is considered to be negligible. No land use restrictions were identified for the Proposed Project Site outside of the RUZ. Thus, impacts on the Proposed Project Site from any surface fault rupture would be less than significant.



### *Seismic-Induced Ground Shaking*

The Project Site is located in a seismically active region and could be subjected to strong ground shaking in the event of an earthquake. In this respect, development of the Proposed Project would expose new residents, employees and visitors to the proposed dwelling units and commercial establishments, and could result in potentially significant adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. However, such hazards are inherent to the region and the effects of ground shaking can be mitigated to a less-than-significant level by incorporating proper design and construction methods in conformance with current building codes and engineering practices.

Modern, well-constructed buildings are designed to resist ground shaking through the use of shear walls and reinforcements. The proposed construction would be consistent with all applicable provisions of the City of Inglewood Building Code, as well as the seismic design criteria contained within the Uniform Building Code. Although the Project Site is located within the Special Studies Zone for the Potrero Fault, and close to many other faults within the region, the potential for seismic hazards would not be higher than in other areas of the City of Inglewood or elsewhere in the region. Such risks have also been incorporated into the project specific seismic design and engineering plans for the Proposed Project and impacts would be less than significant.

### *Seismic-Induced Settlement and Liquefaction*

The Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-induced ground failure associated with settlement and/or liquefaction. Based on the information presented previously in this Section, soils on the Project Site would not be susceptible to liquefaction. The site is not located within a State of California Liquefaction Hazard Zone (CDMG 1998). Groundwater was not encountered in any of the borings, which extended to a maximum depth of 75 feet. The historical shallow ground water level at the site is deeper than 50 feet. Below the depths of proposed soil excavation, the soils consist predominantly of dense sand and stiff clay. Therefore, the potential for liquefaction, lateral spreading, and seismic compaction to occur at the site is considered to be remote and impacts are less than significant.

### *Landslides*

The Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As discussed above, the Project Site ranges from an average elevation of approximately 150 feet above msl to 106 feet above msl (from north to south). The Project site is not located within a City-designated landslide area or an area identified as subject to seismic slope instability. Due to the relatively flat topography of the Project Site and surrounding area, potential impacts associated with landslides would be less than significant.

### ***Erosion and Topsoil***

The Proposed Project would not result in substantial soil erosion or the loss of topsoil. Although construction of the Proposed Project has the potential to result in the erosion of soil during site preparation and construction activities, erosion would be reduced by implementation of appropriate erosion controls during grading. Minor amounts of erosion and siltation could occur during project grading, which would be minimized through adherence to construction Best Management Practices (BMPs) identified in Section IV.F, Hydrology and Water Quality. The potential for soil erosion during the ongoing operation of the Proposed Project is relatively low due to the generally level topography of the area to be developed within the Project Site. Operational erosion would be reduced through adherence to the mitigation measures prescribed in Section IV.F, Hydrology and Water Quality. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all onsite grading and site preparation would comply with applicable provisions of Chapter 11 (Building Regulations), Article 2 (Building Code) of the Inglewood Municipal Code which addresses grading, excavations, and fills. With implementation of the applicable grading and building permit requirements and the application of construction BMPs, a less than significant impact would occur with respect to erosion or loss of topsoil.

### ***Expansive Soils***

The upper clayey soils on the Project Site are expansive and should not be used within two feet of the bottom of pavement or other flatwork. Nonetheless, with adherence to the geotechnical engineering recommendations provided in the Geotechnical Report and the mitigation measures identified in this Section, impacts with respect to expansive soils would be less than significant.

### ***Site Preparation/Grading/Earth Removal***

The proposed maximum limit of soils removal across the Project site is shown in Figure IV.C-8, Estimated Bottom Elevation of Removal. This Figure identifies the estimated bottom elevation of soils removal at the exploration locations (soil boring sites), as overlaid on the preliminary rough grading plan (subject to change). It is anticipated that the amount of cut and fill will balance on-site and no export or import of soils will be required.

Prior to the start of grading, demolition will be required to remove any existing improvements, including pavement and structures. The Grandstand and Club house are supported by 22 to 40 feet deep reinforced caisson foundations. There are 6 known oil wells on the subject site. Discussion of abandonment of existing oil wells is presented in Section IV.D, Hazardous Materials/Risk of Upset. It should be anticipated that the buried remnants of previous construction could be encountered anywhere on the site, including foundations, walls, slabs, basements, mud pits, cesspools, tanks and utilities. As shown in Table IV.C-1, the estimated soil removals will involve excavating 3 to 7.5 feet bgs of on-site soils within the Parking Area, 3 to 22.5 feet bgs of on-site soils within the Main Track area, and 3 to 16



← 5 ft. Interval contours form 1923 topo before the track was built.

**Legend**

- ▲ CPT Location
- Boring Location
- 127 Estimated bottom elevation of removal at exploration locations
- Project Boundary



Reference: Plans obtained from Cooper, Robertson, and Partners, titled Existing Site Plan, dated 7-06.  
 Source: Group Delta Consultants Inc., 07/28/08.

**Table IV.C-1  
Parameters for Grading, Pavement and Infiltration Structure Design**

Area	BH No.	Existing Grade (ft)	Depth of Removal (ft)	Bottom Elevation Removal (ft)	Average Insitu Dry Density (pcf)	Maximum Dry Density (pcf)	Shrinkage Factor (%) (0.92 RC)	R-Value (0-5 ft)	Hydraulic Soil Grouping
Parking Area	B-4H/713	109	7.5	101.5	112.9	132.5	7	15	D
	B-8C/713	102	3	99					
	B-11C/713	93	3	90					
	B-2C/713	121	3	118					
	B-10C/713	115	3	112					
	B-6H/713	106	3	103					
	B-9H/713	98	3	95					
B-9C/713	102	3	99						
Track Area	B-1H/713	125	7	118	104.6	126	10	5 or less	
	B-2H/713	125	17.5	107.5					
	B-5C/713	124	21.5	102.5					
	B-6C/713	120	19.5	100.5					
	B-10H/713	122	22.5	99.5					
	B-3C/713	125	3	122					
B-7H/713	122	22.5	99.5						
Bam Area	B-1C/713	149	3	146	108.9	133.5	11	26	
	B-7C/713	137	10	127					
	B-11H/713	130	3	127					
	B-3H/713	144	3	141					
	B-5H/713	141	4	137					
	B-8H/713	140	3	137					
	B-4C/713	150	16	134					

*Note: Insitu dry density is averaged over the depth range of proposed removal. Maximum dry density in the Table has 95 percent of relative compaction (ASTM D-1557). Shrinkage factor  $SF = 1 - (rd)E / (rd)C$ , where  $(rd)E$  is the insitu dry density of excavated material;  $(rd)C$  is taken as 92% of the maximum dry density of specified relative compaction. Field exploration and laboratory test results indicated that the near surface on site soils consist predominantly of silty clay and clayey silt, which have low permeability. Table Source: Geotechnical Evaluation For Environmental Impact Report, Proposed Residential And Commercial Development, Hollywood Park Redevelopment, Inglewood, California (Table 5), Group Delta Consultants, Inc., March 29, 2007.*

feet bgs of on-site soils within the Barn Area. It should be recognized that removals could be locally deeper depending on the actual conditions encountered in grading and the actual finished grade. Based upon soil conditions, grading conditions could go deeper without any significant impacts.

All temporary excavations and grading will be conducted in accordance with the requirements of the City of Inglewood and the grading recommendations outlined in the Geotechnical Report. Any void created from the demolition would be properly backfilled to the limits determined by the project geotechnical engineer, and as specified in the geotechnical reports for site specific detailed building plans required as mitigation at the end of this section. In general, temporary excavations up to 3 feet may strand in vertical cuts. However, Project area soils with sandier layers are prone to sloughing as they dry out and therefore should be sloped. Any soils loosened or disturbed during the demolition would also be removed. Any existing old wells would require re-abandoning or venting, in accordance with applicable regulations. With adherence to the geotechnical engineering recommendations in the Geotechnical Report, and the mitigation measures identified in this Section, impacts with respect to site preparation, grading and earth removals would be less than significant.

### ***Geologic Hazards***

A potentially significant adverse impact could occur with respect to causing or accelerating geologic hazards associated with the accidental discovery of undocumented and/or abandoned oil wells which could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Potentially adverse impacts associated with this hazard could be reduced to a less-than-significant level by abandoning accidentally encountered wells according to the current requirements of the California Division of Oil and Gas.

### ***Groundwater***

Groundwater was not encountered during GDC's field exploration, to the maximum of 75 feet explored. However, groundwater was encountered by EKI, Inc. during subsurface investigations on the Project site between 70 to 170 feet below ground surface (bgs). Specifically, averaged recorded data by EKI Inc. suggest that groundwater on the Project site ranges between 95 feet bgs in the Parking Area, to 123 feet bgs in the Main Track Area, to 180 feet bgs in the Stables Area. As shown in Table IV.C-1, the proposed soils removal in the Parking Area ranges between 3 and 7.5 feet bgs. In the Track Area, proposed soils removal ranges between 3 and 22.5 feet bgs, and in the Barn Area, proposed soils removal ranges between 3 and 16 feet bgs. Thus, the maximum proposed depth of soils removal is 22.5 feet bgs, well above the shallowest recorded depth to groundwater of 72.45 feet bgs<sup>6</sup> encountered by EKI Inc. during groundwater investigations conducted on the Project site. Therefore, groundwater is not likely to be encountered within the depth of proposed excavation.

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<sup>6</sup> Erler and Kalinowski, (Grab Groundwater Sampling Location PS-GW-4, Figure 5), October 2006.

While the recorded groundwater depth is well below the proposed maximum depth of soils removal, it is possible that locally perched groundwater could be encountered near and beneath the existing lake in the center of the Main Track and has the potential to impact the proposed development during construction. During construction, it may be necessary to provide temporary groundwater control provisions in order to allow for the proposed excavation. In addition, there is the potential for shallow perched water to exist anywhere on the property where the water perches in sandy layers underlain by clay. Should groundwater be encountered, it is anticipated that it can be controlled in several ways. One method which is typically practical for the type of conditions encountered at this site would include the installation of perimeter well points that are connected to collector pipes, which convey water to a suitable holding area. Another method is using shallow trenches, sumps and pumps. Compliance with the geotechnical recommendations provided by the project engineer would effectively mitigate any adverse impacts associated with groundwater to less than significant levels.

### **Land Use Equivalency Program**

The preceding analysis addressed impacts associated with construction and operation of the Proposed Project relative to the following issues: (1) seismic hazards, including fault rupture, (2) landslides, (3) erosion and topsoil, (4) expansive soils, (5) site preparation/grading/earth removal, (6) geologic hazards, and (7) groundwater. The proposed Equivalency Program allows for specific limited exchanges in types of land uses occurring on the Project Site.

The exchange of retail, office/commercial and hotel development for residential, retail, office/commercial and hotel development would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project Site. Under the Equivalency Program, there would be no substantial variation in the Project's street configurations, building pad elevations, or the depth of excavation. Potential changes in land use under the Equivalency Program would therefore have no substantial effect on the proposed earth moving activities, including impacts from seismic hazards, landslides, erosion and topsoil, expansive soils, site preparation, grading and earth removal and their associated impacts because only the use of the land is changing. Specifically, the grading, dewatering, and slope stabilization required for the Proposed Project would be the same under the Equivalency Program, as well as the on-site exposure to seismic hazards. Very minor variations regarding foundation types or in the preparation of landscaping areas could occur, however, such variation would be within the range of construction procedures anticipated to occur with the Proposed Project. In addition, development under the Equivalency Program would not cause or exacerbate any impacts that would occur under the Proposed Project.

The Project Design Feature, discussed below, and recommended Mitigation Measures to minimize impacts to geology and soils under the Proposed Project would be implemented, as appropriate, under the Equivalency Program. Therefore, with implementation of the applicable mitigation measures, geologic and soil impacts attributable to the Equivalency Program, as is the case with the Proposed Project, would be less than significant.

## **CUMULATIVE IMPACTS**

Geotechnical impacts related to future development in the City of Inglewood would involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. These impacts would be site-specific and would not be common to (nor shared with, in an additive sense) the impacts on other sites. Cumulative development in the area would increase the overall population for exposure to seismic hazards by increasing the number of people potentially exposed. However, with adherence to applicable State and Federal regulations, building codes and sound engineering practices, geologic hazards could be reduced to less-than-significant levels. Furthermore, development of each of the related projects and the Proposed Project, including the proposed Land Use Equivalency Program, would be subject to uniform site development and construction review standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts would be less than significant.

## **PROJECT DESIGN FEATURES**

The following PDFs are incorporated in to the Proposed Project, including the Land Use Equivalency Program and were used in the basis for formulating portions of the environmental analysis with respect to geotechnical hazards. As such, it is recommended that the lead agency incorporate the following project design features as conditions of project approval.

PDF C-1. Development of open space and recreational areas within the RUZ, as delineated in the Geomatrix 2007 Memorandum re Final Report (included in Appendix C-1 to this Draft EIR), shall be consistent with the recommendations of the Geomatrix report which identify the RUZ area as unsuitable for the construction of most structures for human occupancy, but useable for construction of recreational type development (e.g., storage facilities, recreational facilities, greenbelts, parking areas and roads). Structures intended for human occupancy shall not be constructed within the mapped RUZ area. The following uses/facilities/structures are suitable in the RUZ: swimming pool and jacuzzi, tot lots, picnic facilities, meditation gardens, children's playground, fireplace and lounge areas, dog parks, exercise stations (parcourse), parking spaces at ground level (including covered parking), utility routes, both above and below ground, tennis courts, basketball courts, soccer fields and other open sports fields (volleyball courts, football play areas, etc.), game tables and seating areas in the open, restrooms, locker rooms, changing rooms (e.g., pool cabana), pool equipment rooms, storage lockers, entry pavilions, covered walkways (e.g. pergola and trellis), fences, and retaining walls.

## **MITIGATION MEASURES**

### *Code-Required Measure*

MM C-1. All buildings and structures shall be designed and constructed in conformance with the applicable regulations and standards of the latest edition of the Inglewood Building Division pursuant to the latest edition of the California Building Code, Los Angeles County Fire Code,

seismic design standards, and applicable state requirements which are in effect at the time of building permit issuance.

### *Project-Specific Mitigation Measures*

In accordance with the Geotechnical Evaluation for Environmental Impact Report, Proposed Residential and Commercial Development, Hollywood Park Redevelopment, Inglewood, California (the "Geotechnical Report") prepared by Group Delta Consultants, dated March 29, 2007, specific mitigation measures are enumerated as follows, and shall be completed to the satisfaction of the City of Inglewood Department of Building and Safety:

- MM C-2. Prior to the start of grading, demolition will be required to remove any existing improvements, including pavement and structures. Any void created from the demolition should be properly backfilled to the limits determined by the project geotechnical engineer. Any soils loosened or disturbed during the demolition should also be removed. The existing old wells may also need to be re-abandoned or vented in accordance with applicable regulations. The presence and location of all existing utilities on the property should be identified. Precautions should be taken to remove, relocate or protect existing utilities, as appropriate.
- MM C-3. Prior to the start of grading, all vegetation and topsoil should be stripped. The vegetation should be removed from the site. The topsoil may be stockpiled and reused in planned landscape areas. In addition, any trees and shrubs should be cleared, so that no roots larger than 1-inch in diameter remain. Any soils loosened during removal of tree/shrubs should also be removed.
- MM C-4. Uncertified fill and soft native clayey soils cannot be used for foundation support, and therefore, need to be removed and replaced with structural fill, consistent with the findings of site-specific geotechnical evaluation.
- MM C-5. Prior to construction, field infiltration testing shall be conducted at locations where infiltration structures are planned.
- MM C-6. All grading should conform to the requirements of the City of Inglewood. The grading contractor is responsible for notifying the project Geotechnical Engineer of a pre-grading meeting prior to the start of grading operations and anytime that the operations are resumed after an interruption.
- MM C-7. Prior to site grading, uncertified fill and soft native soils should be removed and replaced with structural fill. It should be anticipated that unsuitable oversized debris may be present in the existing fill on-site. The actual limits for removals should be determined by the project Geotechnical Engineer depending on the actual conditions encountered, consistent with the findings of a site-specific geotechnical evaluation.



- MM C-8. During earthwork activities, the bottoms of completed excavations shall be observed by the project Geotechnical Engineer, while it is proof-rolled with loaded equipment. Any loose or yielding soils shall be over-excavated and recompacted to the limits determined by the project Geotechnical Engineer.
- MM C-9. Structural fill should consist of predominantly sandy soils, and should be free of expansive clay, rock greater than 3 inches in maximum size, debris and other deleterious materials. All structural fill should be compacted to at least 95 percent of the maximum dry density determined by ASTM D 1557-91. Fill placed in nonstructural and landscape areas should be compacted to at least 90 percent.
- MM C-10. All earthwork and grading shall be performed under the observation of the project Geotechnical Engineer. Compaction testing of the fill soils shall be performed at the discretion of the project Geotechnical Engineer. Testing shall be performed for approximately every 2 feet in fill thickness or 500 cubic yards of fill placed, whichever occurs first. If specified compaction is not achieved, additional compactive effort, moisture conditioning, and/or removal and recompaction of the fill soils will be required.
- MM C-11. All materials used for asphalt, concrete and base shall conform to the 2000 “Green Book” or the equivalent, and shall be compacted to at least 95 percent relative compaction.
- MM C-12. If, in the opinion of the Geotechnical Engineer, Contractor, or Owner, an unsafe condition is created or encountered during grading, all work in the area shall be stopped until measures can be taken to mitigate the unsafe condition. An unsafe condition shall be considered any condition that creates a danger to workers, on-site structures, on-site construction, or any off-site properties or persons.
- MM C-13. Groundwater encountered during temporary excavations shall be controlled using shallow trenches, sumps and pumps. In general, temporary excavations up to 3 feet deep may stand in vertical cuts; sandier layers should be sloped. Construction slopes in the parking Area and Barn Area should be made with an inclination of 1(H) to 1(V). Construction slopes in the Track Area should be made with an inclination of 1.5(H) to 1(V). If the above-recommended slopes are not feasible due to site restrictions, or if surcharge loads other than a nominal value of 240 psf due to traffic loads exist adjacent to the excavation, a flatter slope or temporary shoring may be needed. Earth pressure can be provided if temporary shoring is to be used.
- MM C-14. Surcharge loads, such as vehicular traffic, heavy construction equipment, and stockpiled materials should be kept away from the top of temporary excavations of a horizontal distance at least equal to the depth of excavation. Surface drainage should be controlled and prevented from running down the slope face. Pondered water should not be allowed within the excavation. Workmen should be adequately protected within temporary excavations. Construction equipment and foot traffic should be kept off excavation slopes to minimize sloughing.

- MM C-15. All excavation slopes and shoring systems should meet the minimum requirements of the Occupational Safety and Health Association (OSHA) Standards. Maintaining safe and stable slopes on excavations is the responsibility of the contractor and will depend on the nature of the soils and groundwater conditions encountered and his method of excavation. Excavations during construction should be carried out in such a manner that failure or ground movement will not occur. The contractor should perform any additional studies deemed necessary to supplement the information contained in this report for the purpose of planning and executing his excavation plan.
- MM C-16. It should be anticipated that a site-specific design-level geotechnical report for each new project within the tract will be required. Specifically, after detailed building plans have been developed for each area of the Project Site, additional geotechnical explorations, testing, and analyses shall be performed, as warranted, in order to develop building-specific foundation recommendations. The Project shall be designed and constructed in accordance with the recommendations provided in these additional site specific geotechnical reports.
- MM C-17. The expansion potential of subgrade soils within foundation depth under building pads should be tested in building specific site investigations, and recommendations regarding expansive soils should be presented in site-specific geotechnical reports.
- MM C-18. Soil corrosivity should be tested in building specific site investigations. This potential should be considered in the design and protection of underground metal utilities.
- MM C-19. Assuming R-values of 15 after grading, the following pavement sections for Traffic Index (TI) values of 5, 6, and 7 are recommended:

<u>Traffic Index (TI)</u>	<u>Section Thickness (Feet) AC Over AB</u>
5	0.25 AC/0.65 AB
6	0.30 AC/0.85 AB
7	0.35 AC/1.05 AB

Traffic Index value 5 is recommended for car parking and non-truck driveways. Traffic index of 6 or higher may be used for truck areas or for the streets. The upper 24 inches of subgrade supporting pavements should be compacted to at least 95 percent relative compaction (ASTM D1557-1990). For PCC pavements in areas of some truck traffic, a pavement section of 6 in PCC over 12 inch of aggregate base is recommended. Actual pavement section thickness is subject to verification based on the “R” values of on-site soils, which are expected to be tested after grading.

MM C-20. Proper quality control of grading is required. The Project Applicant shall ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the Project Geotechnical Report are implemented where applicable.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With implementation of the mitigation measures recommended above, the Proposed Project's and the Land Use Equivalency Program's potential adverse impacts associated with geology and soils would be reduced to less than significant levels.

With respect to threshold question (a)(i), the Proposed Project and the proposed Land Use Equivalency Program has the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of the Potrero Fault. Implementation of the Project Design Feature above (see PDF C-1), would restrict development in the delineated RUZ area to non-habitable structures and thus would mitigate this hazard to a less than significant level.

With respect to threshold question (a)(ii), the Proposed Project and the Land Use Equivalency Program has the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. However, implementation of mitigation measures MM C-1 through MM C-20, above, would mitigate such hazards to a less than significant level.

With respect to threshold questions (a)(iii) and (iv), the Proposed Project Site is not prone to liquefiable soils or landslides and thus would not expose people or structures to potential substantial adverse effects associated with such features.

With respect to threshold question (b), construction of the Proposed Project and the Land Use Equivalency Program has the potential to result in the erosion of soil during site preparation and construction activities. Implementation of the applicable grading and building permit requirements and the application of construction BMPs would mitigate the effects of erosion or the loss of topsoil to a less than significant level.

With respect to threshold question (c), with implementation of the mitigation measures, development of the Proposed Project would mitigate the risk of on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse to less than significant levels.

With respect to threshold question (d), with adherence to the geotechnical engineering recommendations provided in the Geotechnical Report and the mitigation measures identified in this Section, impacts with respect to expansive soils would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### D. HAZARDOUS MATERIALS/RISK OF UPSET

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This section describes the environmental setting of the Project related to soil, soil gas, and groundwater conditions and provides an assessment of environmental and cumulative impacts, mitigation measures, and the level of significance after mitigation measures are implemented.

#### ENVIRONMENTAL SETTING

A Phase I Environmental Site Assessment and Limited Compliance Assessment (“the Phase I ESA”) (Appendix D-2) was prepared for the Hollywood Park Racetrack and Casino located at 1050 South Prairie Avenue in Inglewood, California (the “Property”) in 2005, by ENVIRON International Corporation.<sup>1</sup> The tasks completed as part of the Phase I ESA included a site reconnaissance, a review of available records regarding environmental compliance in the possession of the Project Applicant’s predecessor, a review of previous site assessment reports<sup>2</sup>, and a review of existing records on file with certain public agencies including the California Regional Water Quality Control Board, Los Angeles Region (“RWQCB”).

As part of the Project Applicant’s environmental due diligence when it purchased the property, Erler & Kalinowski, Inc. (“EKI”) performed a general review of environmental documents, available records regarding history and use of the Property, and the Phase I ESA prepared by ENVIRON. In June and July 2005, EKI conducted focused screening-level subsurface investigations at the Property to evaluate subsurface environmental conditions and to screen for the presence of chemicals of potential concern (“COPCs”) in soil, soil gas, and groundwater in selected areas on the Property that were identified during the Phase I ESA process.<sup>3</sup>

On behalf of the Project Applicant, EKI submitted to the RWQCB an Application for Oversight Agency Selection, dated 21 July 2006<sup>4</sup> seeking designation of an environmental regulatory agency to provide oversight of soil management and redevelopment of the Property in accordance with the *Memorandum of Agreement Between the Department of Toxic Substances Control and the State Water Resources Control*

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<sup>1</sup> *Environ 2005 a. Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, California, ENVIRON International Corporation, 11 April 2005.*

<sup>2</sup> *D&M, 1999 b. Phase I Environmental Site Assessment and Limited Environmental Compliance Assessment, Hollywood Park Racetrack, 1050 South Prairie Avenue, Inglewood, California, by Dames & Moore, 10 August 1999.*

<sup>3</sup> *EKI, 2006 b. Property-Wide Subsurface Investigation Report and Soil Vapor Extraction Work Plan for Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 30 October 2006.*

<sup>4</sup> *EKI 2006 a. Application for Oversight Agency Selection, Hollywood Park, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 21 July 2006.*

Board and the Regional Water Quality Control Boards and the California Environmental Protection Agency for the Oversight and Investigation and Cleanup Activities of Brownfields Sites, dated 1 March 2005 (“MOA”).<sup>5</sup> The RWQCB was selected, in accordance with the established MOA procedures, as the environmental regulatory oversight agency for the Proposed Project.<sup>6</sup>

A Soil Management Plan (“SMP”) (Appendix D-1), summarizing prior screening-level subsurface investigations, was prepared by EKI to address localized areas found to contain or suspected to contain chemicals of potential concern on the Property. The SMP has been submitted to the RWQCB and approved in subsequent correspondence with the RWQCB.<sup>7,8</sup> The SMP will be implemented as part of the overall development Project under RWQCB oversight. As described in the SMP, areas where COPCs are encountered during the Project at the Property will be investigated, and concentrations of COPCs determined to be above the Property-specific criteria will be remediated in accordance with the SMP approved by the RWQCB prior to or during Property grading, as described below.

The vast majority of the Property has no indications of historical land uses that would have resulted in releases of COPCs to soil and is believed to be un-impacted. A few, relatively localized areas of the Property were identified where chemicals in soil or soil gas were detected at concentrations above the Property-specific environmental criteria listed in the SMP.<sup>9</sup> In the SMP, EKI categorized these areas of potential concern on the Property with respect to subsurface soil and soil gas conditions as follows:

#### **Areas Currently Being Addressed Under Regulatory Agency Oversight or Previously Closed**

- (1) Areas currently being addressed with regulatory oversight:
  - (A) Former Dry Cleaning Area;

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<sup>5</sup> *DTSC 2005 a. Memorandum of Agreement Between the Department of Toxic Substances Control and the State Water Resources Control Board and the Regional Water Quality Control Boards and the California Environmental Protection Agency for the Oversight and Investigation and Cleanup Activities of Brownfields Sites, 1 March 2005.*

<sup>6</sup> *RWQCB 2006. Spills, Leaks, Investigations, and Cleanups (SLIC) Oversight Cost Reimbursement Account – Hollywood Park Racetrack at 1050 South Prairie Avenue, Inglewood, California 90305 (SLIC No. 1207), California Regional Water Quality Control Board, Los Angeles Region, 8 September 2006.*

<sup>7</sup> *Soil Management Plan, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 3 July 2007.*

<sup>8</sup> *RWQCB 2008. Conditional Approval of Work Plan for Installation of Groundwater Monitoring Wells and Work Plan for Proposed Soil Sampling in Western and Southern Parking Lot Areas – Hollywood Park and Casino, 1050 South Prairie Avenue, Inglewood, California (Site ID No. 2040271, SLIC No. 1207), California Regional Water Quality Control Board, Los Angeles Region, 13 August 2008.*

<sup>9</sup> *Soil Management Plan, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 3 July 2007.*

- (B) Former Cypress Fee Site Groundwater Plumes (originating off-site).
- (2) Areas further evaluated and addressed by Hollywood Park Land Company:
  - (A) Methane and Benzene in Soil Vapor Samples near Buried Natural Gas Lines;
  - (B) Former Storm Water Sediment Area.
- (3) Areas previously closed by a regulatory agency:
  - (A) Former Diesel Storage Tank for Emergency Generator.

#### **Areas to be Addressed Prior to or During Property Grading as Part of the Proposed Project**

- (1) Current Vehicle Maintenance Area;
- (2) Former Track Maintenance Area;
- (3) Former Potrero Oil Field Areas (Former Oil Wells and Oil Field Impoundment Area);
- (4) Print Room.

#### **Miscellaneous Areas to be Addressed During Demolition as Part of the Proposed Project**

- (1) Main Track Infield Pond;
- (2) Buried Asbestos Containing Pipe;
- (3) Asbestos Containing Materials and Lead-Based Paint in Structures.

Each of the areas identified above is a localized area of the Project Site that would be addressed prior to or during soil grading activities on the Property as described in the SMP. The Project Site, including the areas listed above, would be subject to the general environmental risk management protocols described in the SMP regarding prudent precautions and general observations and evaluations of soil conditions to be implemented throughout earthwork, grading, excavation, or other soil disturbance activities on the Property. The SMP requires the preparedness of the earthwork and grading contractors to respond to potentially contaminated materials, if any are encountered during the Project.

#### **Approval of the SMP by the RWQCB and the Proposed Groundwater Quality Investigation and Soil Screening Sampling**

In December 2007, the RWQCB conditionally approved the SMP but asked for additional information on certain site conditions including, among other issues, the anticipated quality of the fill used during the original development of the site, arsenic levels found in certain soil samples, and further site assessment

work, including a groundwater quality assessment for the Property and a soil screening sampling plan for certain areas of the Property including the large parking lot.

On April 24, 2008, the Project Applicant submitted a Technical Report and Work Plan (“April 2008 Technical Report and Work Plan”) prepared by EKI in response to the December 2007 conditional approval of the SMP. That 2008 Technical Report and Work Plan responded to the December 2007 RWQCB requests that were the conditional approval of the SMP. In the 2008 Technical Report and Work Plan EKI addressed the RWQCB’s request for additional information on the quality of the fill used during the original development of the site, concluding that the fill had come from other locations on site, as opposed to off site, and therefore did not pose any risk of historic contamination. In addition, EKI analyzed the levels of arsenic found in certain soil samples taken from the Property and confirmed that the majority of the arsenic levels found at the site represented naturally occurring levels of arsenic similar to those found in soils throughout the State of California. The SMP provides a program to address arsenic levels in soil that are discovered during redevelopment and that exceed the naturally occurring levels.

The April 2008 Technical Report and Work Plan also provided a detailed summary of the regional groundwater quality based upon groundwater sampling results from groundwater monitoring wells both on and off the Property. The summary concluded that there are low levels of various chemicals, including nitrate, perchlorate, tetrachloroethene (“PCE”), and total petroleum hydrocarbons (“TPH”) in the groundwater surrounding the Property. EKI concluded that the ubiquitous and low levels of these chemicals in the regional groundwater are consistent with historical industrial, commercial and agricultural uses of the surrounding communities and do not pose risks to the current property uses or future redevelopment. The Work Plan proposed the placement of four groundwater monitoring wells primarily on the western and southern boundaries of the Property in response to the December 2007 request from the RWQCB. Those proposed groundwater monitoring wells will be used to sample groundwater quality for screening purposes and to confirm the groundwater flow gradient and direction along the western and southern boundaries of the Property. There are already groundwater monitoring wells near the northeastern boundary of the Property that are operated by Chevron-Texaco, discussed further below.

The April 2008 Technical Report and Work Plan also proposed taking sixteen shallow soil samples for soil quality screening purposes in the parking lot area in response to the December 2007 request from the RWQCB. These soil samples will be analyzed for various constituents to confirm the overall quality of the shallow soils on the Property.

In response to the April 2008 Technical Report and Work Plan, in letters dated August 13 and 22, 2008, the RWQCB approved the work plans for installation of groundwater monitoring wells and soil sampling in the western and southern parking lot areas provided certain conditions are strictly met, including (i) installing at least four more groundwater monitoring wells near the Grandstand Building, at the Former Dry Cleaning Area, in the Former Maintenance Area and in the northern sections of the main racetrack infield area, east of the Townsite fault, and (ii) conducting quarterly groundwater monitoring at least four

quarters to adequately assess groundwater gradient and/or plume changes beneath the Property. The August 22, 2008 letter includes deadlines for completing the additional reports and activities requested.

The process of approval of the April 2008 Technical Report and Work Plan is ongoing and there may be additional changes made to the work plan during this process. However, it is anticipated that the substantive issues raised in the August 13 and 22, 2008 letters will be resolved and a final work plan will be approved.

Except where noted otherwise, this Section is based upon a comprehensive review of the following site-specific investigations, including analysis and conclusions contained therein:

- Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, California, prepared by ENVIRON International Corporation, 11 April 2005;
- Property-Wide Subsurface Investigation Report And Soil Vapor Extraction Work Plan For Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, prepared by EKI, 30 October 2006;
- Soil Management Plan, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, prepared by EKI, dated 3 July 2007; and
- Technical Report and Work Plan, prepared by EKI and dated 24 April 2008 (EKI, 2008).

The Phase I ESA and the SMP are incorporated into Appendix D-1 and D-2, respectively, of this Draft EIR. Due to the size of the document, the 30 October 2006 report and the 24 April 2008 Technical Report and Work Plan prepared by EKI are available as references, but are not included in the Appendix.

### **Existing Project Site**

The Property was developed as a racetrack in 1938. Currently, it is developed with two main structures: the Racetrack Grandstand and the Pavilion/Casino. (See Figure II-3, Existing Site Plan, in Section II. Project Description.) The Racetrack Grandstand is an approximately 594,000 square foot building which houses 200 general offices, a maintenance department, print shop, laundry, television department, and two gift shops. There are also several concession stands including two full-service restaurants, five kitchens, and approximately 50 bar areas. The second main structure on the Project Site is the Pavilion/Casino, a six-story, approximately 400,000 square foot building. This building houses a casino, restaurants, sports bar, health club, and area for parties and banquets. Existing facilities and structures associated with ongoing racetrack operations include the Main Racetrack, which is a one and one-eighth mile horse racing track, a Training Track, 18 barns suitable for stabling 2,000 horses, an equine hospital, and 10 small buildings that house repair and maintenance facilities for the Racetrack's fleet of tractors, trucks, buses, and other support equipment. The front of the Grandstand building is landscaped and includes a paddock area where horses can be viewed before each race. Large paved surface parking lots front along both



Prairie Avenue and Century Boulevard, extending the length of the property frontage along these two streets.

The general topography of Hollywood Park is relatively flat with a slight slope from north to south. The race track facilities are raised slightly on building pads and to the east an escarpment borders Darby Memorial Park. Existing landscaping at Hollywood Park includes mature palm trees surrounding the Grandstand and Casino buildings and landscaping around the patron entrance to the racetrack and paddock area. The Project Site consists of landscaping and eucalyptus trees located throughout the parking areas and behind the Main Racetrack. The Hollywood Park property line along Century Boulevard and Prairie Avenue is planted with a combination of pine trees, shrubs, and groundcover.

### **Historical Uses of Project Site**

The Phase I ESA included a review of historical photographs and maps, as well as information provided by personal interview to determine the historical uses on the Project site. Based on this review, the Phase I ESA indicated that prior to 1938, the Property was undeveloped land, the western portion of the Project site was used for agriculture (row crops), and several rural roads crossed the property.

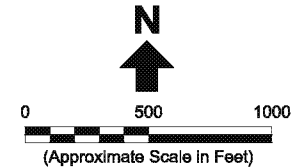
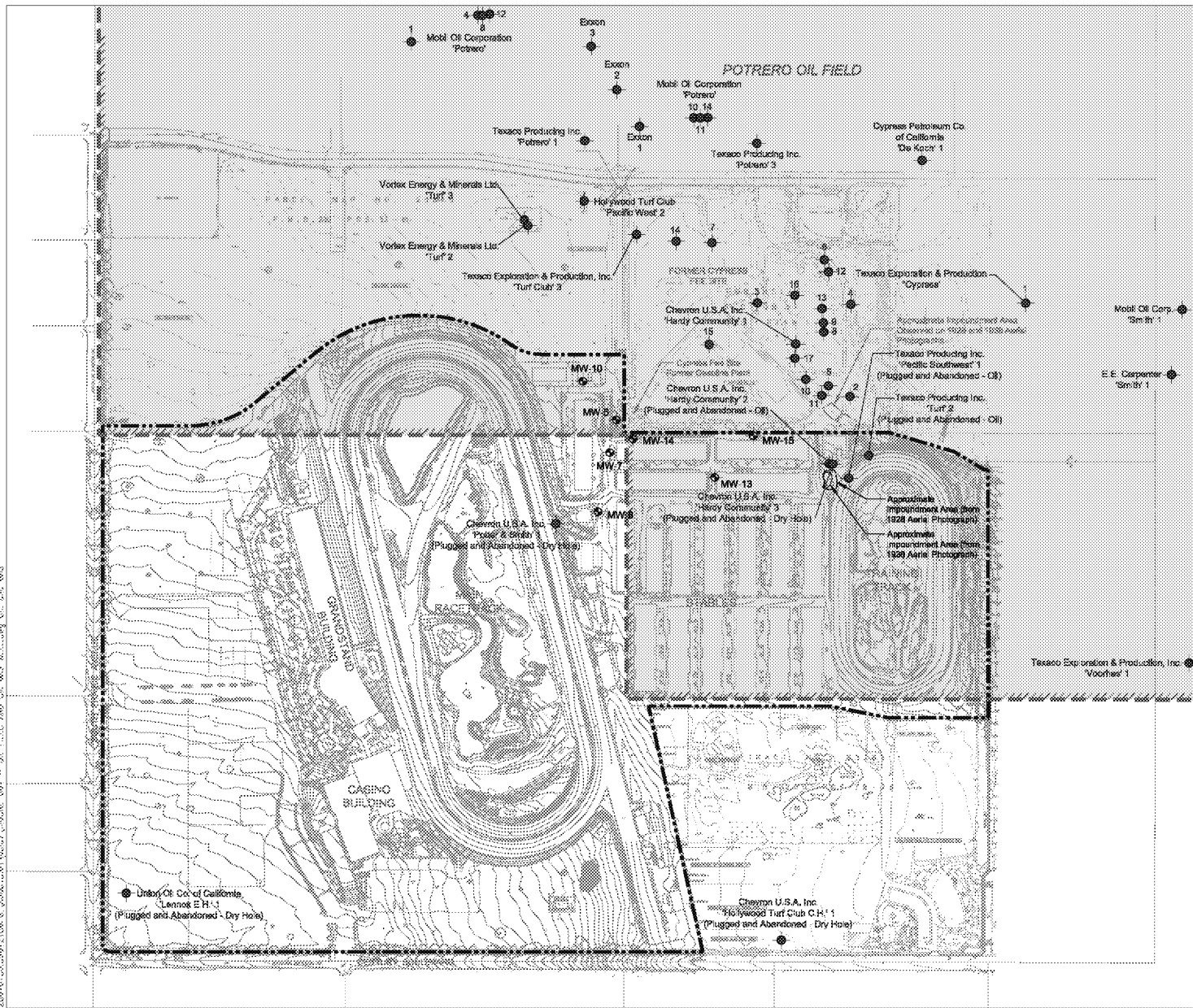
The northern and eastern portions of the Project site were used for oil production including exploratory wells, oil producing wells, and related facilities.<sup>10,11</sup> These previous oil production operations are located within the mapped boundaries of the former Potrero Oil Field (See Figure IV.D-1, Former Oil Field and Oil and Gas Well Location Map). Historically, six oil wells were drilled on the Property at locations within and outside the boundary of this former oil field. Of the six, three are abandoned former oil producing/exploratory wells, and three are identified as plugged and abandoned/dry. These former oil producing and exploratory wells remain on the site. Other oil field related facilities were historically located on the Project site, including a possible former oil field impoundment area near the northwest corner of the Training Track.

In 1938, the site was developed as a horse racing track. The original racetrack facility reportedly included the Grandstand Building, a training track, stable areas, and maintenance facilities. A maintenance shop, including a vehicle repair facility, was reported to be located on the Property from the late 1930s to the mid 1980s. The Pavilion Building was constructed in 1984, and the Casino Building was constructed in

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<sup>10</sup> *EKI, 2006 b. Property-Wide Subsurface Investigation Report and Soil Vapor Extraction Work Plan for Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 30 October 2006.*

<sup>11</sup> *Environ 2005 a. Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, California, ENVIRON International Corporation, 11 April 2005.*



**Legend:**

- Approximate Property Boundary
- Former Potrero Oil Field Boundary
- Former Oil and Gas Well Location (DOGGR, 2003)
- ⊕ Existing Chevron Monitoring Well

**Notes:**

1. All locations are approximate.
2. Basemap source: ALTA/ACSM Land Title Survey for Hollywood Park, Inc. prepared by PSOMAS, West Los Angeles, California, updated 20 July 2005 and Hall & Foreman, Woodland Hills, California, updated 13 April 2007.
3. Potrero Oil Field boundary and oil and gas well locations from State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Map 123, dated 14 November 2003.
4. Lennox E.H. 1 location surveyed by Hall & Foreman, Inc., Woodland Hills, California, 23 March 2007.

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Source: Erler & Kalinowski, Inc., July 2007.

1995.<sup>12</sup> In 2005, the current owner of the property purchased the Property and is continuing the existing commercial Hollywood Park Racetrack and Casino operations on the Project site.<sup>13</sup>

### Existing Surrounding Properties

The area surrounding the Project site is dominated by commercial-recreational, urban residential, commercial, and light industrial uses, as described in Section II, Project Description. To the north, the Property is bounded by paved parking areas, including a fenced-off area previously used for oil extraction, and the former Cypress Fee Site (which included a former oil field and gasoline manufacturing plant).<sup>14</sup>

The former Cypress Fee Site has been redeveloped and is now the Renaissance residential site, redeveloped by Watt Communities. Darby Memorial Park abuts the Project site in the northeast corner. The Forum, previously known as the Great Western Forum, is located just north of West 90<sup>th</sup> Street at Prairie Avenue. This sports arena is approximately 100-feet tall and can hold approximately 18,000 people for concerts and services. Since professional sports teams such as the Los Angeles Kings, the Los Angeles Lakers, and the Sparks have moved out of the Forum, the site has continued to be used for large concerts and weekly church services.<sup>15</sup>

Just beyond West 90<sup>th</sup> street and east of the Forum are Carlton Square and Briarwood, two gated residential communities. Older two-story residential uses are located immediately east of the Project site. A commercial retail center is located immediately south of the Project, including Home Depot, Staples, and Target, as well as numerous other commercial retail uses. One- and two-story commercial retail and restaurant uses are located immediately south of the Project site across Century Boulevard. Generalized land uses along Century Boulevard include highway oriented commercial, airport-related warehouse distributions, older low-rise apartment structures and several vacant properties. Immediately to the west of the Project site across Prairie Avenue are one- and two-story commercial retail and restaurant uses. Older multi-family residential uses lie to the west, beyond Prairie Avenue.

To the northwest is Kelso Elementary School, located at the intersection of Kelso and Prairie Avenues. Centinela Hospital lies approximately 0.25 miles to the west of the Project site at 555 East Hardy Street, between South Myrtle and Flower Streets.

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<sup>12</sup> *Ibid.*

<sup>13</sup> *Ibid.*

<sup>14</sup> DOGGR 2003. *Map 123, California Department of Conservation, Division of Oil, Gas, and Geothermal Resources*, 14 November 2003, and HartCrowser 2003a. *Phase I Environmental Site Assessment, Former Texaco Cypress Fee Facility and Inglewood Gasoline Company Property, Inglewood, California*, HartCrowser, 5 March 2003.

<sup>15</sup> City of Inglewood General Plan Update Technical Background Report, 2006.

## Historical Uses of Surrounding Properties

As described above, the Renaissance residential development located adjacent to, and directly north of the Property was formerly the Texaco Cypress Fee site, which was part of the former Potrero Oil Field and was used for oil production from approximately the 1920s through the 1980s (see Figure IV.D-1). The Cypress Fee site was used for various oil field-related activities including petroleum extraction, storage, and separation by Getty Oil, Chevron, and Texaco for approximately 60 years, between approximately 1930 and 1985. The site was, at one time, improved with 18 oil well production sites, associated oil storage tanks, buried and aboveground pipelines, four oil field impoundment areas, the Inglewood Gasoline Plant, a tank battery area where natural gas tanks, compressors, and separators were stored and operated, and four oil sumps. By 1985, all oil and gas related infrastructure had been removed, including 18 documented oil wells, which were abandoned in accordance with the then-current State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (“DOGGR”) requirements.<sup>16</sup> Gasoline and oil impacted soils associated with this historical land use were remediated to the satisfaction of the RWQCB<sup>17,18</sup> consistent with its Waste Discharge Requirement Order (WDR 88-049),<sup>19</sup> which was rescinded on 22 April 1999 (RWQCB 2001). The RWQCB still oversees impacts to groundwater from the former Cypress Fee site as discussed below.

Gasoline and oil impacted groundwater remediation efforts for the former Cypress Fee site have required ongoing groundwater monitoring in the southwestern corner of the former Cypress Fee site, where the adjacent, off-site former Inglewood Gasoline Plant was located (RWQCB, 1988), and in down gradient areas on the Property<sup>20,21</sup> (see below regarding information on local groundwater conditions). Groundwater monitoring wells were first installed to monitor contamination at the former Cypress Fee site as a requirement of WDR 88-049 (RWQCB, 1988), and the RWQCB required groundwater monitoring to continue in accordance with monitoring program CI No. 6820 after closure was issued for the completion of soil remediation. In 1991, the RWQCB required Texaco (now Chevron) to design a

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<sup>16</sup> HartCrowser 2003b. Subsurface Investigation Report, Former Texaco Cypress Fee Facility and Inglewood Gasoline Company Property, Inglewood, California, HartCrowser, 4 April 2003.

<sup>17</sup> RWQCB 2001. Results of Soil Vapor Extraction Testing, Groundwater Monitoring, and Sampling, and Request for Site Closure – Texaco Cypress Fee, Inglewood, California (File No. 100.315); SLIC #084, California Regional Water Quality Control Board, Los Angeles Region, 25 April 2001.

<sup>18</sup> RWQCB 2003b. No Further Action for Soil – Texaco Cypress Fee, 3000 90<sup>th</sup> Street, Inglewood, California (SLIC No. 084, Site ID 2040200), California Regional Water Quality Control Board, Los Angeles Region, 14 October 2003.

<sup>19</sup> RWQCB 1988. Waste Discharge Requirements – Land Treatment Project at Texaco, Inc. Cypress Fee Oil Field, Inglewood, (File No. 87-14; CI 6820), California Regional Water Quality Control Board, Los Angeles Region, 4 May 1988.

<sup>20</sup> BBL, 2003a. Groundwater Investigation Work Plan, Cypress Fee Property, Inglewood, California, Blasland, Bouck & Lee, Inc., 14 November 2003.

<sup>21</sup> Arcadis BBL, 2007. 2006 Annual Groundwater Monitoring Report, Cypress Fee Property, Inglewood, California, Arcadis/BBL, 24 January 2007.

groundwater remediation program,<sup>22</sup> and groundwater remediation was performed from 1995 through January 1998. Order WDR 88-049 was rescinded on 22 April 1999; however, the RWQCB has required submittal of subsequent work plans for groundwater investigation, monitoring, and sampling in 1999 and 2003.<sup>23,24</sup> Between 1992 and March 2005 (BBL, 2006<sup>25</sup>), seven groundwater monitoring wells were installed by Chevron, at the request of the RWQCB, on the Hollywood Park Property (see Figure IV.D-2, Groundwater Sampling Locations), and all of the monitoring wells on the former Cypress Fee site were abandoned prior to the Watt development. The seven monitoring wells on the Hollywood Park Property are currently used by Chevron for monitoring of benzene and tertiary butyl alcohol (“TBA”) plumes that are migrating in groundwater from the former Cypress Fee site onto the Property. Groundwater monitoring of these wells is performed on a semi-annual basis by consultants for Chevron (formerly Texaco), in accordance with the 2003 groundwater investigation work plan, and results are reported to the RWQCB.

In December 2006, the depth to groundwater in these seven monitoring wells ranged from approximately 162 to 174 feet below the ground surface (bgs). According to the RWQCB, the current remedial plan for these Cypress Fee site petroleum constituent plumes in groundwater is monitored natural attenuation (i.e., no active remediation is currently in place nor is active remediation expected to be required by the RWQCB in the near future). The Chevron monitoring wells on the Property may require abandonment prior to general Property grading as part of the Project. The RWQCB will make a determination in the future as to whether continued monitoring is necessary.

The groundwater monitoring wells are owned by Chevron, are not in public service, are covered with steel lids and are only used for groundwater sampling and monitoring purposes contracted by Chevron. Groundwater pumping for potable or non-potable uses is not occurring at the Project site, and there is no known current access by the public to groundwater below the Project Site.

### **Database Review of Project Site and Surrounding Properties**

The Phase I ESA (ENVIRON, 2005a) included a database search of hazardous material sites that are listed on current federal, State, and local environmental regulatory agency databases. As a part of this search, the Phase I ESA identified several database listings for sites located within the American Society

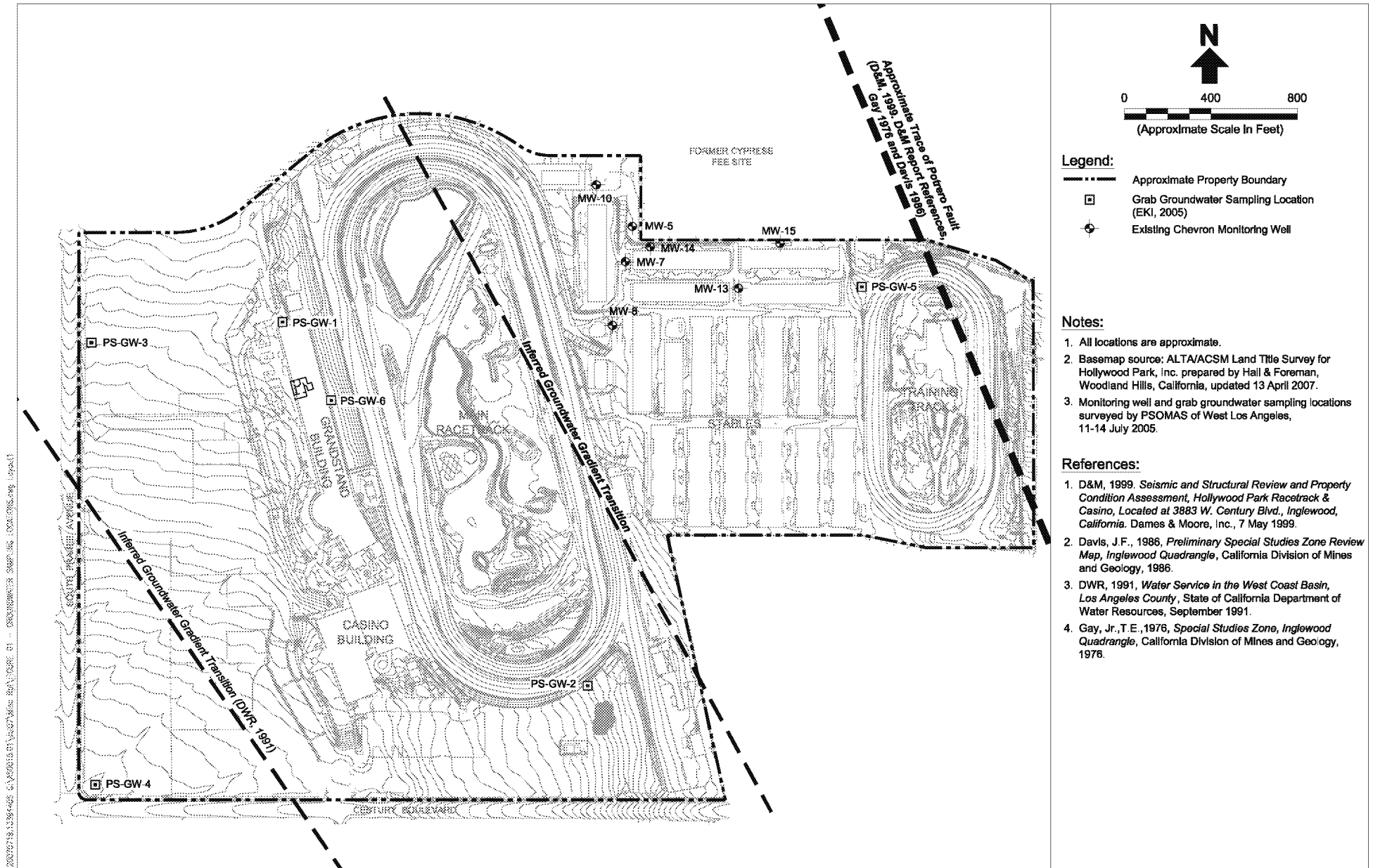
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<sup>22</sup> *Earth Tech, 1991. Scope of Work for Design of a Groundwater Remediation Program, Inglewood, California, The Earth Technology Corporation, 8 February 1991.*

<sup>23</sup> *AET, 1999. Workplan for Groundwater Monitoring and Sampling, Texaco E&P Cypress Fee Facility, Inglewood, California, Applied Environmental Technologies, Inc., 1 June 1999.*

<sup>24</sup> *RWQCB, 2003a. Semi-Annual Groundwater Monitoring – Texaco Cypress Fee, 3000 90th Street, Inglewood, California (SLIC No. 084, Site ID 2040200), California Regional Water Quality Control Board, Los Angeles Region, 17 September 2003.*

<sup>25</sup> *BBL, 2006. 2005 Annual Groundwater Monitoring Report, Cypress Fee Property, Inglewood, California, Blasland, Bouck & Lee, Inc., 23 January 2006.*



Source: Erler & Kalinowski, Inc., July 2007.

for Testing and Materials (“ASTM”) designated search radius (i.e., generally one, one-half, or one-quarter mile radius) of the Project site, discussed below (see Phase I ESA in Appendix D-1).

Other than the former Cypress Fee site, which was specifically discussed in the Phase I ESA, ENVIRON concluded that none of the off-site properties included in the databases listed above were determined likely to impact soil or groundwater conditions on the Property or to pose a significant hazard or risk to future occupants residing or working on the Project Site.

The EKI Technical Report and Work Plan, referenced above, included a more detailed review of the surrounding property uses and focused on a number of gasoline service stations and a car wash that operate or were operated on properties near the Property and that have had recorded leaks of petroleum products, in some cases to groundwater. While none of those sites appears to have experienced a release of petroleum products that would have any significant or material impact on the groundwater quality under the Property, the four groundwater monitoring wells discussed in the Work Plan will assist in making that evaluation.

### **Sensitive Receptors**

Appendix G to the State CEQA Guidelines considers a significant impact to occur if a proposed project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school. Furthermore, the South Coast Air Quality Management District (“SCAQMD”) generally considers the following land uses to be sensitive receptors with respect to air quality impacts: long-term health care facilities; rehabilitation centers; convalescent centers; retirement homes; residences; schools; playgrounds; child care centers; and athletic facilities.<sup>26</sup> Therefore, for purposes of this analysis, the following land uses surrounding the Project Site are identified as sensitive receptors with respect to hazardous material exposure:<sup>27</sup>

- Sensitive Receptor No. 1 – William H. Kelso Elementary School (approximately 1,300 feet northwest);
- Sensitive Receptor No. 2 – Carlton Square and Briarwood, gated residential communities across 90<sup>th</sup> Street (approximately 950 feet north);
- Sensitive Receptor No. 3 – Renaissance residential townhomes, immediately adjacent (approximately 20 feet north);

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<sup>26</sup> South Coast Air Quality Management District, *Air Quality Analysis Guidance Handbook*, Figure 4-2, July 1999.

<sup>27</sup> All distances reflect the distance from the sensitive receptor to the closest point of the Project Site boundary.

- Sensitive Receptor No. 4 – Darby Memorial Park/Martin Luther King Community Center, immediately adjacent (approximately 120 feet northeast);
- Sensitive Receptor No. 5 – Residential, immediately adjacent (approximately 100 feet east);
- Sensitive Receptor No. 6 – Lockhaven School, across Century Blvd. (approximately 1,300 feet southwest);
- Sensitive Receptor No. 7 – Centinela Hospital, across Prairie Avenue (approximately 1,000 feet west);
- Sensitive Receptor No. 8 – Holy Trinity Child Care Center, across Crenshaw Blvd. (approximately 1,000 feet east);
- Sensitive Receptor No. 9 – K. Anthony Middle School, across Prairie Ave (approximately 100 feet to the west);
- Sensitive Receptor No. 10 – Morningside High School, south of property, (approximately 1,200 feet to the south).

Other than the residential, school, day care, and hospital uses discussed above within ¼ mile of the Proposed Project, there are no other sensitive receptors in the immediate project vicinity. It should be noted that while there are additional Inglewood School District schools proximate to the Project site, they are all located greater than ¼ mile from the Project site.

### **Soils and Hydrology**

The Project Site's average topographic elevation ranges approximately (north to south) from 150 feet above mean sea level (msl) in the Stables Area, to 121 feet above msl in the Main Track Area, to 106 feet above msl in the Parking Area. The average elevation change across the Project site (north to south) is 43 feet. These data generally agree with those reported in Section IV.C, Geology/Soils, with regard to average site elevations.<sup>28</sup> The Project site and surrounding properties are generally topographically flat with a slight southwesterly slope.

The Property is located in the Rosecrans Hills physiographic region of Los Angeles County. The shallow sediments that underlie the Property consist of the Pleistocene Lakewood Formation. Regionally, these

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<sup>28</sup> *The location of soil borings for the preparation of the Geotechnical Report discussed in the Geology/Soils Section of this Draft EIR were not identical to the location of soil borings for the environmental site investigations as presented in this Section of the Draft EIR. Thus, the average site elevation data reported in this Section of the Draft EIR are not identical to the average site elevation data reported in the Geology/Soils Section.*



sediments are comprised of sand, silt, silty sand, and sandy clay with occasional gravel lenses. Sediments observed by EKI during soil and groundwater sampling at the Property were generally consistent with descriptions of the Lakewood Formation. Generally, fill material up to 15 feet thick was observed to be underlain by sand, silty sand, sandy silt, and clayey sand that were generally encountered to depths of 70 to 90 feet bgs. Below 70 to 90 feet bgs, well-graded sand, gravelly sand, sandy clay, and minor gravel were encountered to maximum drilling depths of 180 feet bgs. However, EKI's soil characterizations for the Property are intended only for purposes of environmental assessment and are not intended for geotechnical purposes.

Published historical records suggest that one fault zone currently crosses the Property. The Potrero Fault is a well-mapped fault zone that crosses the northeastern portion of the Property in the vicinity of the Training Track. The Inglewood (Townsite) trace that is reported to cross the southwestern portion of the Property,<sup>29,30,31</sup> together with the Potrero Fault may be influencing groundwater conditions (e.g., groundwater depth and gradient) in different areas of the Property. These conditions are described here with regard to their potential influence on groundwater only; the significance of these conditions with regard to seismic activity is evaluated in Section IV.C, Geology /Soils.

The Property is located within the West Coast Groundwater Basin.<sup>32</sup> During groundwater investigations by EKI and others on the Property, groundwater was encountered at depths ranging from approximately 70 feet bgs in the southwestern corner of the Property to approximately 115 to 180 feet bgs in the remainder of the Property. In general, depth to groundwater across the Property is approximately 100 feet or greater, except in the southwestern corner.

Local topography lends itself to the pattern of shallower groundwater in the southwest and deeper groundwater in the northeast given the general rise in surface topography across the Project site from the southwest to the northeast.

### **Identified Impacts to Soil and Groundwater by COPCs from Project Site**

The SMP prepared for the Project Site addresses the potential for chemicals of potential concern to be present in soil and soil vapor at the Property from past or present activities on the Property and describes

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<sup>29</sup> Davis, 1986. *Preliminary Special Studies Zone Review Map, Inglewood Quadrangle, California Division of Mines and Geology*, by J.F. Davis, 1986.

<sup>30</sup> Gay, 1976. *Special Studies Zone, Inglewood Quadrangle, California Division of Mines and Geology*, by T.E. Gay Jr., 1976.

<sup>31</sup> Geomatrix, 2007. *Clarification of Points on Final Report – Geologic Investigation of the Potrero Fault for Hollywood Park (Inglewood, CA), Project No. 10834, November 2005, dated 5 July 2007.*

<sup>32</sup> WRD 2001. *Regional Groundwater Monitoring Report, Central and West Coast Basins, Los Angeles County, California, Water Year 1999-2000, Water Replenishment District of Southern California, February 2001.*

procedures and protocols for environmental risk management that will occur during planned redevelopment activities at the Project Site. The SMP presents selected Property-specific environmental risk-based criteria for soil and soil gas (see Table 1 in the SMP found in Appendix D-1). These Property-specific, numerical soil and soil gas criteria have been selected for use during implementation of the SMP at the Property based on consideration of:

- Published screening criteria for protection of human health and groundwater quality that are (a) generally applied for initial evaluation of analytical data to facilitate rapid, preliminary decisions regarding the potential need for remediation for protection of human health and groundwater quality, as described above, and (b) determined by the respective regulatory agencies to be protective of human health for unrestricted residential land use at a lifetime incremental cancer risk of  $10^{-6}$  or less (i.e., 1 in a million) and a hazard index (“HI”) of 1 or less for non-carcinogenic health risks for each COPC;
- Potentially exposed populations given the currently planned land uses of the Property; and
- Potentially complete exposure pathways that are relevant to the potentially exposed populations.

Thus, the criteria provided in the SMP are considered protective of human health and the environment for planned land uses of the Property. Comparable criteria for commercial land uses, for use if determined to be appropriate in consultation with the RWQCB, are also provided in the SMP.

During the environmental due diligence process conducted by EKI between 2005 and 2007 on behalf of Hollywood Park Land Company (HPLC), EKI identified localized areas of potential environmental concern on the Property and performed subsurface investigations to evaluate the potential presence of COPCs in soil and soil gas. Based on the available data and as described in the SMP, the following areas are now categorized as follows.

### **Areas Addressed Under Regulatory Agency Oversight or Previously Closed**

#### ***1. Areas currently being addressed with regulatory oversight:***

Former Dry Cleaning Area - The Former Dry Cleaning Area is located inside the northern end of the Grandstand Building. Dry cleaning operations reportedly were discontinued in approximately 1999, and the duration of dry cleaning operations at Hollywood Park is unknown, according to Hollywood Park personnel. Tetrachloroethene (also known as perchloroethene – or PCE) was detected in soil and soil gas at concentrations above the Property-specific criteria. The Property owner is currently working with the RWQCB to implement soil vapor extraction (“SVE”) remediation in this area to remove the PCE from

soil and soil gas.<sup>33</sup> In a letter dated August 20, 2008, the RWQCB approved the work plan for the SVE rebound testing and confirmation of soil sampling in the Former Dry Cleaning Area subject to certain conditions such as including additional intermediate and lateral confirmation soil sample locations to assess the remaining PCE soil contaminations in the areas that are distant from SVE well locations, and advancing an initial soil confirmation boring to the water table in the identified PCE source area to determine the vertical extent of PCE soil contamination. The Project Applicant will continue to discuss these items with RWQCB staff as rebound testing and confirmation of soil sampling in the Former Dry Cleaning Area progresses. Remediation of soil and soil gas is expected to be complete, and PCE concentrations are expected to be largely remediated to the Property-specific soil and soil gas criteria with RWQCB oversight before any construction at the site would begin. Any residual PCE occurrences in soil, soil gas, or groundwater would be addressed under RWQCB oversight following demolition of the Grandstand Building or otherwise during development.

Former Cypress Fee Site Groundwater Plumes (originating off-site) – According to RWQCB staff, the current remedial plan for these Cypress Fee site petroleum constituent plumes in groundwater is monitored natural attenuation (i.e., no active remediation is currently in place nor is active remediation expected to be required by the RWQCB in the near future). The Chevron monitoring wells on the Property may require abandonment prior to general Property grading as part of redevelopment. Replacement of any of the Chevron monitoring wells will be dependent on the completed development (i.e., access for placement of new monitoring wells in public or non-intrusive areas of the Project) and specific monitoring or well design requirements, if any, from the RWQCB.

As described in the “Historical Uses of Surrounding Properties” section, groundwater migrating onto the Project site from the former Cypress Fee site is impacted with benzene and TBA, which are considered volatile organic compounds (“VOCs”). During the focused screening-level subsurface investigations at the Property conducted by EKI in June and July 2005, and further sampling in April 2007, several shallow soil gas samples (i.e., at 7 feet bgs) were collected directly above and in the vicinity of these Cypress Fee site groundwater plumes. These data indicated that benzene and TBA are not migrating upward from the groundwater table into shallow soil gas at concentrations above the Property-specific soil gas criteria provided in the SMP. Benzene was detected at concentrations above the Property-specific soil gas criteria in two shallow soil gas samples in the general vicinity of the Cypress Fee benzene plume and outside the specific “Areas to be Addressed Prior to or during Project Grading” discussed below; however, detection of benzene at these two locations is potentially related to natural gas line leaks (discussed in the paragraph below). In accordance with the SMP, confirmation soil gas samples will be collected at these two locations following Project grading activities.

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<sup>33</sup> RWQCB, 2007. *Conditional Approval of Soil Vapor Extraction Work Plan – Former Dry Cleaning Area in Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California (Site ID No. 2040271, SLIC No. 1207)*, California Regional Water Quality Control Board, Los Angeles Region, 8 May 2007.

## ***2. Areas to be further evaluated and addressed as part of project implementation:***

Methane and Benzene in Soil Vapor Samples near Buried Natural Gas Lines – In 2005, methane and benzene were detected in certain soil gas samples collected in the eastern portion of the stable area, near the locations of suspected leaking buried natural gas lines. Samples of gas collected directly from the natural gas pipeline by ENVIRON on 19 August 2005 confirmed that natural gas conveyed in these lines contained benzene in concentrations of up to 58 µg/L.

In 2006 and 2007, Hollywood Park personnel repaired the natural gas lines. In follow-up soil gas samples collected during April 2007, methane gas was detected in soil gas at PS-SGM-52 up to 24,000 parts per million by volume (“ppmv”), above the DTSC hazard level of 5,000 ppmv, and at the PS-SGM-51 location up to 2,000 ppmv, above the DTSC screening level of 1,000 ppmv. Benzene was detected at two sampled locations, SG-4 (0.17 µg/L) and PS-SGM-27 (0.13 µg/L), at concentrations above the Property-specific soil gas criterion listed in the SMP. The PS-SGM-51, PS-SGM-52, and SG-4 sample locations are in areas where ongoing natural gas pipeline leaks are still suspected. Thus, the presence of methane and benzene in soil gas at these sampling locations may be related to ongoing natural gas pipeline leaks in these areas. The source for the benzene in soil gas at the PS-SGM-27 location is not known, but may also result from buried natural gas pipeline leaks. Little is known about utility lines that may be present at the PS-SGM-27 location because this sampling point is on the edge of the northern Property boundary.

Prior to or during Property grading, the existing buried natural gas lines will be removed from the ground and disconnected, purged, or abandoned in place as permitted by Project redevelopment plans. The discontinuation of natural gas service to these pipelines during demolition and grading should be effective at reducing the concentrations of methane and benzene detected in soil gas in these areas. Following completion of Property grading, soil gas samples will be collected from prior sample locations SG-4 and PS-SGM-27, in accordance with the protocols described in the SMP, to confirm benzene concentrations in soil gas at these locations are below the Property-specific soil gas criterion listed in the SMP.

Former Storm Water Sediment Area - Storm water discharges at Hollywood Park are currently permitted under National Pollutant Discharge Elimination System (“NPDES”) Permit No. CA0064211, Order No. R4-2006-0062, and Monitoring and Reporting Program No. CI-8100, adopted by the RWQCB on 13 July 2006. In 2001, as part of the storm water system upgrades required by RWQCB, two buried Jensen boxes (storm water sediment traps) were installed as part of the permitted, upgraded storm water management system. Since installation of these boxes, until late 2005, sediments collected in the boxes were removed periodically by Hollywood Park personnel and deposited in shallow pits dug in the ground northeast of the Training Track. This area was identified as the Storm Water Sediment Area in EKI’s 30 October 2006 report.<sup>34</sup> Methane gas was detected in soil gas samples collected in 2005 in this area at a maximum

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<sup>34</sup> EKI, 2006 b. *Property-Wide Subsurface Investigation Report and Soil Vapor Extraction Work Plan for Former Dry Cleaning Area, Hollywood Park Racetrack and Casino, 1050 South Prairie Avenue, Inglewood, California, Erler & Kalinowski, Inc., 30 October 2006.*

concentration of 460,000 ppmv. The presence of methane gas appeared to be the result of decomposition of buried organic materials (i.e., storm water sediments) in that area.

In 2007, HPLC voluntarily excavated approximately 1,750 tons (estimated 1,100 cubic yards) of buried storm water sediments and soil from the former Storm Water Sediment Area and disposed of these materials at an off-site facility. Confirmation soil samples did not contain chemical concentrations above the Property-specific soil criteria listed in the SMP. The results of analyses of the eight soil confirmation samples indicate that the buried storm water sediments in the former Storm Water Sediment Area were adequately removed. Methane gas was detected at a maximum post-excavation concentration of 600 ppmv (PS-SGM-65), thereby confirming that methane gas concentrations in the former Storm Water Sediment Area were reduced below levels of concern following the excavation in this area.

### **3. Areas previously closed by a regulatory agency:**

Former Diesel Storage Tank for Emergency Generator - the Casino Building at the Property is equipped with emergency generators that provide backup power. Beginning in 1984, the generators were fueled by a 6,000 gallon, single-walled, fiberglass underground storage tank ("UST") for diesel fuel located south of the Casino Building. In February 2007, the diesel fuel UST and associated piping were removed by the Property owner under oversight from the Los Angeles County Fire Department ("LAFD"), the Environmental Programs Division of the Los Angeles County Department of Public Works ("LADPW"), the City of Inglewood Division of Building and Safety, and SCAQMD. Seven post-excavation confirmation soil samples were collected during the UST removal at the direction of a LADPW inspector (Clean Fuels, 2007). Diesel-range petroleum hydrocarbons were detected in the soil sample collected below the locations of the former UST and associated piping at a maximum concentration of 49 milligrams per kilogram ("mg/kg"), which is below the Property-specific soil criterion listed in the SMP. No VOCs; benzene, toluene, ethylbenzene, and xylenes ("BTEX") compounds; or fuel oxygenates were detected in any of the soil samples analyzed. A closure report was submitted to the LADPW (Clean Fuels, 2007). LADPW issued a closure certification letter to HPLC, dated 14 June 2007, stating that all closure requirements have been completed and no further action is required at this time, based on LADPW's review. Thus, no further response actions are planned regarding the former UST in this area, other than implementation of general SMP protocols during the Project as needed.

### **Areas to be Addressed Prior to or During Project Grading**

Current Vehicle Maintenance Area - the Current Vehicle Maintenance Area, located southeast of the Main Track (see Figure II-3 in Section II, Project Description), has been in use by Hollywood Park since approximately 1984. Chemicals reportedly used and stored at this facility include fuel in below ground tanks, new and used oil storage, and miscellaneous solvent storage (i.e., degreasers, water-based parts washers). Vehicle maintenance and repairs are performed in service bays located along the eastern side of the building. A hazardous waste storage area and an above-ground waste oil storage tank ("AST") are located on the south side of the maintenance building. To support ongoing racetrack operations, the Current Vehicle Maintenance Area currently utilizes an 8,000-gallon diesel fuel UST and a 5,000-gallon

gasoline UST located below the small fuel pump island south of the Current Vehicle Maintenance Area building. Soil samples collected in this area by EKI did not contain chemicals above the Property-specific criteria listed in the SMP. Soil gas samples collected at two locations in the service bays and one location near the hazardous waste storage area contained benzene and PCE, respectively, at concentrations above their Property-specific soil gas criteria (EKI, 2007). Following shut down of current operations at the Property, the two USTs would be removed and closed in accordance with LADPW, LAFD, City of Inglewood, and SCAQMD requirements. Impacted soil, if encountered during the UST removal process, will be managed in accordance with applicable laws and regulations as needed to obtain closure of the USTs from the LADPW. During the Project, this area will be managed as described in the SMP.

Former Track Maintenance Area - a track maintenance area previously existed in the area that is currently within the southern portion of the infield of the Main Track; a grassy area with no visible signs of the former structures. The Former Track Maintenance Area reportedly was used for equipment and vehicle maintenance and repair, and at least one fuel UST may have formerly existed in this area, based on available historical drawings (i.e., Sanborn fire insurance maps). There is no record of the existence or closure of this UST in regulatory agency files reviewed by EKI; thus, the status of this reported fuel UST is unknown. Soil samples collected in this area did not contain chemicals above the Property-specific criteria listed in the SMP. Two soil gas samples collected in this area contained PCE above the Property-specific soil gas criterion listed in the SMP. During the Project, this area would be managed as described in the SMP.

Former Potrero Oil Field Areas (Former Oil Wells and Oil Field Impoundment Area) - The northern and eastern portions of the Property were part of a larger former oil production field defined by DOGGR as the Potrero Oil Field. DOGGR identifies a total of six former oil wells or exploratory wells (of which three of the latter did not produce oil) on the Property. Of these six locations, DOGGR file information shows three former oil producing wells in the northeastern portion of the Property within the former Potrero Oil Field. These three wells are known as: Chevron USA Inc., Hardy Community 2; Texaco Producing Inc., Pacific Southwest 1; and Texaco Producing Inc., Turf 2. DOGGR also identifies three former oil well locations labeled “plugged and abandoned - dry hole”; these are: Chevron USA, Inc., Hardy Community 3; Chevron USA, Inc., Potter & Smith 1; and Union Oil Co. of California, Lennox E.H. 1.

During March and April 2007, the Property owner located, excavated, and surveyed the wellhead of the former Lennox E.H. 1 oil well located in the southwestern corner of the Property (see Figure IV.D-1). As part of Property development (i.e., following shut down and demolition of current HP facilities and prior to general Property grading), each of the five remaining oil wells would be located. All six wells of the former oil wellheads would be assessed for the presence of petroleum hydrocarbon residuals in soil and for methane gas, and, if deemed necessary in accordance with current DOGGR guidance and inspections by DOGGR staff, well re-abandonment will be performed. Former oil wells that are expected to be covered with new buildings as part of the Project would require appropriate protective measures, e.g.,

vent cones placed over the wellhead, in accordance with requirements specified by DOGGR and City of Inglewood based on the encountered conditions at each wellhead.

Based on the review of available historical Property use information, an apparent oil field-related, former impoundment area (i.e., potentially used for the collection of oil, wastewater, and/or drilling fluids from former producing wells in this area) existed near the northwestern entrance to the Training Track (see Figure IV.D-1). However, in 2005, soil samples collected in this area did not contain chemicals above the Property-specific criteria listed in the SMP, except for one sample. One soil sample (PS-SB-8-4.5) at a depth of 4.5 feet bgs contained arsenic at a concentration of 18.7 mg/kg, which is slightly above the Property-specific soil criterion of 15 mg/kg. Benzene was also detected in one soil gas sample (PS-SGM-48) from this area above the Property-specific soil gas criterion listed in the SMP. During the Project, this area will be managed as described in the SMP.

Print Room - The Print Room, located adjacent to Tunnel 4 in the Grandstand Building, has been used for decades for in-house printing of materials, race programs, and photo processing. Soil samples collected in this area did not contain chemicals above the Property-specific criteria listed in the SMP other than one sample. A soil sample collected below the floor in an area of visible floor surface staining (PS-SG-2) contained arsenic at a concentration of 21.6 mg/kg, which is above the Property-specific soil criterion of 15 mg/kg listed in the SMP. Soil gas samples from this area did not contain chemicals above the Property-specific criteria listed in the SMP. During the Project, this area will be managed as described in the SMP.

#### **Miscellaneous Areas to be Addressed During Demolition**

Main Track Infield Pond - The existing ponds in the Main Track infield are part of the storm water management system currently permitted under NPDES Permit No. CA0064211, Order No. R4-2006-0062, and Monitoring and Reporting Program No. CI-8100, adopted by the RWQCB on 13 July 2006. The Property owner does not plan to use the pond water during demolition or grading operations (i.e., pond water will not be used for dust control). Water present in these ponds will be managed and discharged in accordance with the existing NPDES permit for the Property. Organic materials may be present in any sludge or sediments found at the bottom of the current infield pond, and the pond sediments and lining materials will be removed and disposed at an appropriately permitted off-site facility prior to general Property grading in accordance with the protocols described in the SMP for off-site disposal. According to the preliminary grading plan and land use plan, the pond area would be filled with up to 25 feet of fill material within the former infield pond area to achieve the design grade prior to development for residential land use.

Asbestos Containing Materials in Structures – Asbestos-containing materials (ACM) are materials that contain asbestos, a naturally-occurring fibrous mineral that has been mined for its useful thermal properties and tensile strength. ACM is generally defined as either friable or non-friable. ACM is defined as any material containing more than one percent asbestos. Friable ACM is more likely to produce airborne fibers than non-friable ACM, and can be crumpled, pulverized, or reduced to powder by

hand pressure. Non-friable ACM is defined as any material containing one percent or more asbestos that cannot be crumpled, pulverized, or reduced to powder by hand pressure. When left intact and undisturbed, ACM does not pose a health risk to building occupants. Potential for human exposure only occurs when ACM becomes damaged or actively worked (e.g., drilled, sanded, scraped, etc.) to the extent that asbestos fibers become airborne and can be inhaled. These airborne asbestos fibers are carcinogenic and can cause lung disease.<sup>35</sup>

The principal federal government agencies regulating asbestos are the Occupational Safety and Health Administration (OSHA) and the United States Environmental Protection Agency (USEPA). The age of a building is directly related to its potential for containing elevated levels of ACM. Generally, all untested materials are presumed to contain asbestos in buildings constructed prior to 1981. The USEPA recommends a proactive in-place management program be implemented wherever undamaged ACM are found in a building. The U.S. EPA recommends that damaged ACM be removed, repaired, encapsulated, or enclosed. Prior to demolition activities, the USEPA recommends that all ACM be removed.<sup>36</sup>

Asbestos-containing building materials are present on the Property, as reported in a Phase I report prepared in 1999 by Dames & Moore, the Phase I report prepared by ENVIRON, and the Limited Asbestos and Lead Materials Survey Report prepared for the Property by Citadel Environmental Services, Inc.<sup>37</sup> ACM in Property structures will be addressed as part of the Project work by demolition and abatement contractors, in accordance with laws and regulations and City of Inglewood requirements.

### *Asbestos Cement Pipe*

According to Hollywood Park personnel, buried asbestos cement (“AC”) or “transite” pipe may be located below grade in the Stable Area of the property. The locations of the AC pipe are not specifically known. If AC pipe is encountered during property demolition, grading, over-excavating or earthworks operations, it will be managed as described in the SMP.

### *Lead-Based Paint in Structures*

Lead-based paint (LBP), which can result in lead poisoning when consumed or inhaled, was widely used in the past to coat and decorate buildings. Lead poisoning can cause anemia and damage to the brain and nervous system, particularly in children. Like ACM, LBP generally does not pose a health risk to building occupants when left undisturbed; however, deterioration, damage, or disturbance can result in hazardous exposure. In 1978, the use of LBP was federally banned by the Consumer Product Safety

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<sup>35</sup> U.S. Environmental Protection Agency, <http://www.epa.gov/asbestos/pubs/ashome.html>, July 2007.

<sup>36</sup> *Ibid.*

<sup>37</sup> *Limited Asbestos and Lead Materials Survey Report, Hollywood Park, 1050 South Prairie Avenue, Inglewood, California, Citadel Environmental Services, Inc., 13 January 2006.*



Commission. Therefore, only buildings built before 1978 are presumed to contain LBP, as well as buildings built shortly thereafter, as the phase-out of LBP was gradual.<sup>38</sup>

LBP is present on the Property, as reported in a Phase I report prepared in 1999 by Dames & Moore, the Phase I report prepared by ENVIRON in 2005, and the Limited Asbestos and Lead Materials Survey Report prepared for the Property by Citadel Environmental Services, Inc.<sup>39</sup> LBP in Property structures would be addressed as part of the work by demolition and abatement contractors, in accordance with laws and regulations and City of Inglewood requirements.

### **Status of RWQCB Evaluation of Certain Areas to be Addressed**

As stated above, in response to the April 2008 Technical Report and Work Plan, in letters dated August 13 and 22, 2008, the RWQCB approved the work plans for installation of groundwater monitoring wells and soil sampling in the western and southern parking lot areas provided certain conditions are strictly met, including (i) installing at least four more groundwater monitoring wells near the Grandstand Building, at the former dry cleaning area, in the former maintenance area and in the northern sections of the main racetrack infield area, east of the Townsite fault, and (ii) conducting quarterly groundwater monitoring at least four quarters to adequately assess groundwater gradient and/or plume changes beneath the Property. Since the process of approval is ongoing, additional changes to work plan may be adopted, including revising requests for additional work, reports and surveys.

### **Identified Impacts to Soil and Groundwater by COPCs from Surrounding Properties**

Seven groundwater monitoring wells located on the Hollywood Park Property, primarily in the eastern area of the Property, are currently used by Chevron for monitoring of benzene and TBA plumes that are migrating in groundwater from the former Cypress Fee site onto the Property. This groundwater contamination is described further in the "Historical Uses of Surrounding Properties" section above.

The Project Applicant has proposed an additional four groundwater monitoring wells to be located on the Hollywood Park Property primarily in the western and southern portions of the Property for the purpose of confirming groundwater quality and flow direction in those locations. The proposed groundwater monitoring wells are further described above in the section entitled Approval of the SMP by the RWQCB and the Proposed Groundwater Quality Investigation and Soil Screening Sampling. The four groundwater monitoring wells will allow for groundwater quality sampling. In approving the April 2008 Technical Work Plan, the RWQCB conditioned its approval on requiring the installation of at least four additional groundwater monitoring wells near the Grandstand Building, at the former dry cleaning area, in

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<sup>38</sup> U.S. Environmental Protection Agency, <http://www.epa.gov/lead/>, July 2007.

<sup>39</sup> Citadel, 2006. *Limited Asbestos and Lead Materials Survey Report, Hollywood Park, 1050 South Prairie Avenue, Inglewood, California, Citadel Environmental Services, Inc., 13 January 2006.*

the former maintenance area and in the northern sections of the main racetrack infield area, east of the Townsite fault.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

In accordance with Appendix G to the State CEQA Guidelines, a significant impact with regard to hazards and hazardous materials would occur if the Project were to result in any of the following conditions:

- (a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- (b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- (c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- (d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment;
- (e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area;
- (f) For a project located within the vicinity of a private airport strip, result in a safety hazard for people residing or working in the project area;
- (g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and
- (h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residence are intermixed with wildlands.

### **Impacts Determined to be Less Than Significant**

With respect to threshold (h), the Project site is not located within proximity to open space, brush, or forested properties and is not susceptible to wildland fire hazards. With respect to threshold (f), the project is not located within the vicinity of a private airport strip and is pose a safety hazard for people

residing or working in the project area. Therefore, no further analysis of these topics is required. Topics (a) through (e) and (g) are discussed below.

### **Project Impacts**

Following is a discussion of the Project's impacts during construction and operation with respect to hazardous materials and risk of upset. Specific areas that are discussed include routine transport, use, and disposal of hazardous materials; accidental release of hazardous materials; hazardous emissions and acutely hazardous materials/substances handling proximate to schools; listed hazardous materials sites; public airport safety hazard; and, emergency response plans.

#### *Construction*

Implementation of the Proposed Project would require demolition of most of the existing Hollywood Park Racetrack facilities and associated structures on the Project Site. The two racetrack infield lakes currently existing on the Project Site will be removed and recreated on the Project Site as an integral component of the Specific Plan for the Proposed Project (see Section II, Project Description for a detailed description of the Project). Water present in these ponds will be managed and discharged in accordance with the existing NPDES permit for the Property, and the pond sediments and lining materials will be removed and disposed at an appropriately permitted off-site facility prior to general Property grading in accordance with the protocols described in the SMP.

#### *Routine Transport, Use, or Disposal of Potentially Hazardous Materials*

During implementation of the SMP and during the demolition of existing structures and grading/excavation phases, the Project may involve the routine transport and disposal of potentially hazardous materials, including asbestos containing materials, lead-based paint, debris containing these materials, and potentially hazardous materials identified in the Phase I ESA as associated with daily operation of the Hollywood Park facility (i.e., lubricants, oils, hydraulic fluids, various degreasers, x-ray equipment and photographic chemicals (including fixer/replenisher and developer), janitorial supplies, paints and paint-related products, hypochlorite solution, inks and isopropyl alcohol, a silver recovery unit in the equine hospital, a potential polychlorinated biphenyl ("PCB")-containing electrical transformer, waste oil, spent solvents, and oily rags. Materials to be appropriately managed in accordance with the SMP include soils containing COPCs at concentrations above the environmental criteria for the Project from areas known, suspected or found to contain COPCs during implementation of the SMP as part of the Project (see below). Furthermore, during the construction phase, the Proposed Project is anticipated to require the routine transport, use, and disposal of cleaning solvents, fuels, and other hazardous materials commonly associated with construction projects. All hazardous materials encountered or used during demolition, grading/excavation, and construction activities would be handled in accordance with all applicable local, State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste, based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. As compliance with existing regulations is mandatory for all development projects, adherence to all applicable rules and regulations would reduce

potentially significant impacts with respect to routine transport, use, and disposal of hazardous materials during construction to less than significant levels.

#### *Accidental Release of Hazardous Materials*

As described in the SMP and summarized above, there are four areas at the Project site that will be addressed prior to, or during, grading with RWQCB oversight and approval, and three general areas at the Project site that will be addressed during demolition. These seven areas are discussed below.

#### *Areas to be Addressed Prior to or During Property Grading*

- (1) Current Vehicle Maintenance Area
- (2) Former Track Maintenance Area
- (3) Former Potrero Oil Field Areas (Former Oil Wells and Oil Field Impoundment Area)
- (4) Print Room

Within these four areas, hazardous materials were detected in soil gas and soil at concentrations above the Property-specific criteria defined in the SMP, as described above. Remediation of these small, localized areas of soil impact will be performed prior to or during Property grading, likely by excavation and off-site disposal of soil identified to contain COPCs above the criteria. Air monitoring in accordance with SCAQMD requirements will be performed during excavation of these areas, as described in the SMP. The SMP also contains protocols to require various contractor's plans, e.g., dust control plans, storm water pollution prevention plans, and stockpile management and testing plans, when needed. Confirmation soil and/or soil gas sampling will be conducted as described in the SMP to document that post-construction conditions meet the Property-specific soil and soil gas criteria summarized in the SMP. These four areas will be addressed as part of the Project with oversight and approval from the RWQCB. Accidental releases of hazardous materials associated with these activities could occur during transportation of soil off site, as described in the "Routine Transport, Use, or Disposal of Potentially Hazardous Materials" paragraph above. Remaining fuel USTs used during Hollywood Park operations will be emptied and removed in accordance with the closure requirements of local agencies, including LAFD, LADPW, SCAQMD, and City of Inglewood.

#### *Miscellaneous Areas to be Addressed during Demolition*

- (1) Main Track Infield Pond
- (2) Buried Asbestos Containing Pipe
- (3) Asbestos Containing Materials and Lead-Based Paint in Structures

These materials will be removed during the demolition phase of the Project, as described above. Accidental releases of hazardous materials associated with these activities could occur during their transportation off site, as described in the “*Routine Transport, Use, or Disposal of Potentially Hazardous Materials*” paragraph above.

#### *Sensitive Receptors, Including Schools*

The Project Site is located near the William H. Kelso Elementary School (approximately 1,300 feet to the northwest); Residential across 90<sup>th</sup> Street, to the north (approximately 950 feet to the north); Renaissance residential community (approximately 20 feet to the north); Darby Memorial Park/Martin Luther King Community Center (approximately 120 feet to the northeast); Residential to the east (approximately 100 feet); Lockhaven School (approximately 1,300 feet southwest across Century Blvd.); Centinela Hospital (approximately 1,200 feet west, across Prairie Avenue); Holy Trinity Child Care Center (approximately 1,000 feet east); K. Anthony Middle School (approximately 100 feet to the west across Prairie Avenue), Morningside High School (approximately 1,200 feet to the south), and the Proposed School (on the civic site within the Proposed Project)<sup>40</sup> identified as sensitive receptors with respect to hazardous materials.

As such, prior to mitigation, the Project could result in a potentially significant impact related to exposure of nearby students and neighbors to accidental release of the following hazardous material during demolition, excavation, and construction activities: ACM, LBP, contents of underground storage tanks, soil containing COPCs above Property-specific criteria defined in the SMP, and natural gas, if not properly managed. With the implementation of the mitigation measures described in the SMP and summarized at the end of this Section, risks associated with accidental release of these hazardous materials during construction would be reduced to less than significant levels and such materials would not be expected to endanger sensitive receptors in the project vicinity. In addition, the transport of potentially hazardous materials off-site would be conducted in accordance with all applicable laws and regulations to ensure the health and safety of the general public as well as any sensitive receptors along the haul route, resulting in a less than significant impact.

#### *Listed Hazardous Materials Sites*

As discussed above, the Project Site address is listed on one or more government regulatory database (see Appendix D-2 for a full list of databases and sites). The Phase I ESA described ENVIRON’s review and assessment of these listings, which were further reviewed by EKI.

Potentially hazardous chemicals such as fuels, paints, solvents and oils historically used during Hollywood Park operations on the Property will be removed from the Project site during the demolition phase of the Project, along with ACM and LBP, as required, prior to demolition of structures, as

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<sup>40</sup> For the purpose of analyzing the impacts to Hazardous Materials/Risk of Upset, the 4-acre civic site is assumed to be a school since it could result in more impacts than a library.

described above. Areas to be addressed prior to or during Property grading, as described in the SMP, are summarized above.

#### *Emergency Response Plans*

The Proposed Project is located along Century Boulevard, a designated evacuation route in the City of Inglewood.<sup>41</sup> Development of the Project Site may require temporary and/or partial street closures along Century Boulevard due to construction activities. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans involving the use of Century Boulevard, and they would be conducted in accordance with the City's permitting process. In addition, adjacent collector/local streets could be used to access Century Boulevard on either side of a temporary and/or partial street closure. Therefore, the Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant. (See Section IV.K.2, Fire Protection Services.)

#### *Aircraft Overflight*

The Project is located within 2 miles of Los Angeles International Airport. Portions of the Project Site are located within the designated airport influence area for LAX. As discussed in Section IV.I, Land Use, the Proposed Project would be developed in accordance with the development guidelines of the applicable Airport Land Use Plan and would not negatively impact safe air navigation. Therefore, the Proposed Project would not result in a safety hazard for people residing or working in the project area.

### **Operation**

#### *Routine Transport, Use, or Disposal of Potentially Hazardous Materials*

Under the Project, only minor quantities of potentially hazardous materials will be stored or used on the Property as part of the planned residential, commercial, civic, and recreational land uses; no industrial land uses are planned. For example, cleaning solvents would be used in association with janitorial cleaning and maintenance in the proposed retail and restaurant space, as well as maintenance/landscaping and daily household activities in the proposed residences. As such, no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Proposed Project. Any potential storage of fuels (e.g., for a commercial operation) will comply with current laws and regulations. Those limited quantities of hazardous materials that would be used would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations. Therefore, impacts related to routine transport, use, and disposal of hazardous materials during operation would be less than significant.

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<sup>41</sup> City of Inglewood General Plan Safety Element, July 1995.

### *Accidental Release of Hazardous Materials*

As described in the “Routine Transport, Use, or Disposal of Potentially Hazardous Materials” paragraph above, only minor quantities of potentially hazardous materials commonly associated with commercial and residential uses are expected to be stored or used on the Property as part of the completed Project. No industrial operations are planned, and no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Project once completed. Therefore, accidental releases of hazardous materials, such as janitorial or household chemicals, could occur, but such releases would be minor. As such, potential impacts to the accidental release of hazardous materials would be less than significant.

### *Listed Hazardous Materials Sites*

As described in the SMP, following completion of the activities described above in accordance with the approved SMP, no known areas of the Property should exist that contain COPCs in soil or soil gas at concentrations above their respective Property-specific soil or soil gas criteria listed in the SMP. As such, it is expected that areas where soil and soil gas concentrations meet the criteria for residential land use listed in the SMP would be acceptable for unrestricted land use and potentially significant impacts would be reduced to less than significant levels.

### *Sensitive Receptors, Including Schools*

The Project Site is located adjacent to and in the immediate vicinity of residences and schools that have been identified as sensitive receptors with respect to potential releases of hazardous materials. Implementation of the SMP as part of the Project prior to, and during, site grading and earthwork as part of construction of the Project will reduce the threat of release of identified COPCs in soil to less than significant levels. As discussed above, operation of the Project once constructed would involve the use of solvents typically associated with the cleaning and maintenance of retail and restaurant areas, as well as the maintenance/landscaping and daily household activities in residences. As such, no substantial quantities of hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Proposed Project and such materials would not be expected to endanger sensitive receptors in the project vicinity. Therefore, impacts would be less than significant.

In the event that development of the Civic Site component of the Proposed Project includes a school site, the Inglewood School District (ISD) would be responsible for conducting due diligence tasks/reports necessary to ensure suitability of the site for use as a public school. At that future time, the ISD would be responsible for coordinating with DTSC for all appropriate environmental clearances and approvals for the intended school site, including but not limited to site closure letters, as applicable. Therefore, any potential impacts associated with the risk of exposure of a school site to potentially hazardous materials would be reduced to less-than-significant levels.

### **Land Use Equivalency Program**

The Land Use Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Land Use Equivalency Program, there would be no substantial variation in the Project's Circulation Plan, building pad elevations, or the depth of excavation. Potential changes in land use under the Land Use Equivalency program would therefore have no substantial effect on the proposed construction activities and their associated impacts because only the use is changing. Specifically, the site characterization and associated remediation required for Project development would be the same under the Land Use Equivalency Program as well as the potential risk of exposure to safety and health hazards. Very minor variations regarding foundation types or in the preparation of landscaping areas could occur, however, such variations would be within the range of construction procedures anticipated to occur with the Proposed Project. In addition, development under the Land Use Equivalency Program would not cause or exacerbate any hazardous material/risk of upset impacts that would occur under the Proposed Project.

All Project Design Features and/or recommended mitigation measures to minimize safety/risk of upset impacts under the Proposed Project would be implemented, as appropriate, under the Land Use Equivalency Program. Implementation of the Land Use Equivalency program would therefore not expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. Consequently, with implementation of applicable mitigation measures, hazardous materials/risk of upset impacts attributable to the Land Use Equivalency Program, as in the case with the Proposed Project, would be less than significant.

### **CUMULATIVE IMPACTS**

Development of the Proposed Project in combination with the related projects identified in Section III, Related Projects, would not have the potential to increase the risk for accidental release of hazardous materials. The Related Projects identified in Section III include a list of all past, present, and probable future projects that are located within an approximate 2-mile radius of the Project Site and are thus considered capable of producing related or cumulative impacts with respect to hazardous environmental conditions. Each of the related projects would require evaluation for potential threats to public safety, including those associated with the accidental release of hazardous materials into the environment during construction and operation, emergency response, transport/use/disposal of hazardous materials, and hazards to sensitive receptors (including schools). Because hazardous materials and risk of upset conditions are largely site-specific, this would occur on a case-by-case basis for each individual project affected, in conjunction with development proposals on these properties. Implementation of the recommended Mitigation Measures D-1 through D-8 would reduce the Proposed Project's potential impacts associated with the accidental release of hazardous materials during construction and operation as well as emergency response to less-than-significant levels, such that the Proposed Project would not



combine with any of the related project to cause a cumulatively significant impact. Further, each related project would be required to follow local, State, and federal laws regarding hazardous materials and other hazards. Therefore, with compliance with local, State, and federal laws pertaining to hazards and hazardous materials, cumulative impacts would be less than significant.

## **PROJECT DESIGN FEATURES**

No specific PDFs have been proposed with respect to hazardous materials/risk of upset impacts.

## **MITIGATION MEASURES**

- MM D-1. The Project Applicant shall implement the RWQCB-approved SMP environmental risk management protocols under RWQCB oversight during the Project.
- MM D-2. COPCs encountered at the Property in soil and soil gas during the Project and implementation of the SMP shall be investigated, and concentrations of COPCs determined to be above the Property-specific criteria listed in the SMP will be remediated as part of the Project in accordance with the SMP approved by the RWQCB.
- MM D-3. Groundwater is not expected to be encountered during work activities associated with the Project. Groundwater on the Property, if discovered during the Project to contain COPCs, will be addressed as required by RWQCB.
- MM D-4. Former oil and gas wells at the Property shall be located, inspected, and reabandoned, if necessary, as required by DOGGR consistent with proximate land use.
- MM D-5. Prior to the issuance of the building demolition permit by City of Inglewood, the Project Applicant will submit to the City of Inglewood proof of certification from its selected contractor showing qualification to handle asbestos and lead-based paint. Proper removal and remediation actions will be undertaken in conformance with the regulations of the South Coast Air Quality Management District and the State of California, Division of Occupational Health and Safety.
- MM D-6. Any COPC-containing soil stockpiled at the Project site shall be stored in accordance with the SMP approved by the RWQCB and in such a manner that underlying soils are not cross-contaminated. This could be accomplished by the use of plastic sheeting placed under and on top of the stockpiled materials, or other suitable methods. The management, treatment, or disposal of such material shall comply with all federal, state, and local regulations related to hazardous waste, as applicable. All stockpiled materials shall be protected in order to prevent materials from being washed into storm drains, in accordance with the Project storm water pollution prevention plan ("SWPPP").

MM D-7. Handling and removal of hazardous materials will comply with federal, state and local regulations, which include requirements for disposal of hazardous materials at facilities licensed to accept such waste.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Following implementation of the mitigation measures described above during development, environmental conditions at the Property will meet environmental criteria appropriate for the established land uses in accordance with the SMP approved by the RWQCB. Therefore, potential impacts associated with exposure to potentially hazardous materials would be less than significant.

With respect to threshold question (a), the Proposed Project has the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. During construction, all hazardous materials encountered or used during demolition, grading/excavation, and other construction activities would be handled in accordance with all applicable local, State, and federal regulations. With respect to operation of the Proposed Project, only minor quantities of potentially hazardous materials will be stored or used on the Property as part of the planned residential, commercial and recreational land uses, and as such, no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Proposed Project. Implementation of MM D-7 would reduce this potential hazard to a level that is less than significant.

With respect to threshold question (b), the Proposed Project has the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. During construction, this impact will be addressed through the SMP, with RWQCB oversight. During operation of the Proposed Project, only minor quantities of potentially hazardous materials commonly associated with commercial and residential uses are expected to be stored or used on the Property as part of the completed Project. No industrial operations are planned, and no substantial quantities of hazardous materials would be used, transported, or disposed of in conjunction with the routine day-to-day operations of the Project once completed. Implementation of MM D-1 through MM D-7 would reduce this potential hazard to a level that is less than significant.

With respect to threshold question (c), the Proposed Project has the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The Project Site is located adjacent to and in the immediate vicinity of residences and schools that have been identified as sensitive receptors with respect to potential releases of hazardous materials. With the implementation of the mitigation measures described in the SMP, risks associated with accidental release of these hazardous materials during construction would not be expected to endanger sensitive receptors in the project vicinity. In addition, the transport of potentially hazardous materials off site would be conducted in accordance with all applicable laws and regulations to ensure the health and safety of the general public as well as any sensitive receptors along the haul route. Operation

of the Project once constructed would involve the use of solvents typically associated with the cleaning and maintenance of retail and restaurant areas, as well as the maintenance/landscaping and daily household activities in residences and as such, no substantial quantities of hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Proposed Project and such materials would not be expected to endanger sensitive receptors in the project vicinity. Implementation of MM D-2 and MM D-4 will reduce the threat of release of identified COPCs in soil to less than significant levels.

With respect to threshold question (d), the environmental due diligence process conducted by EKI between 2005 and 2007 identified localized areas of potential environmental concern on the Property in soil and soil gas. Following completion of the activities described above in accordance with the SMP and MM D-1 through MM D-7, potentially significant hazards associated with exposure to localized areas of potential environmental concern would be mitigated to less than significant levels.

With respect to threshold question (e), the Proposed Project would be developed in accordance with the development guidelines of the applicable Airport Land Use Plan and would not negatively impact safe air navigation. Therefore, impacts associated with air navigation safety would be less than significant prior to mitigation and no mitigation measures are required.

With respect to threshold question (g), the Proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Any temporary or partial street closures along Century Boulevard due to construction activities would be conducted in accordance with the City's permitting process. Therefore impacts would be less than significant prior to mitigation and no mitigation measures are required.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### E. CULTURAL RESOURCES

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The following analysis pertaining to historic resources is based on the Historic Resources Technical Report, Historic Resources Survey, Evaluation, and Analysis of Project Impacts, Final, Hollywood Park Project, California, July 24, 2007. This report is included in its entirety as Appendix E-1 of this Draft EIR. The analysis pertaining to archaeological and paleontological resources is based on the results of a Cultural Resources Records Search for the Hollywood Park Redevelopment Project, City of Inglewood, provided by the South Central Coastal Information Center, California Historical Resources Information System, California State University, Fullerton, Department of Anthropology, dated July 24, 2007. The Cultural Resources Records Search is included in its entirety as Appendix E-2 of this Draft EIR.

#### ENVIRONMENTAL SETTING

##### Regulatory Setting

###### *National Register of Historic Places*

The National Register of Historic Places (National Register) is “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” The National Register is administered by the National Park Service, which is part of the U.S. Department of the Interior. Typically, to be eligible for listing in the National Register, a property must be at least fifty years of age and possess significance in American history and culture, architecture, or archaeology. However, properties under fifty years of age can be determined eligible for listing if it can be determined that they are of “exceptional importance,” or if they are contributors to a potential historic district. Properties may qualify for the National Register when they meet any of four basic criteria:

- A. Are associated with events that have made a significant contribution to the broad patterns of history.
- B. Are associated with the lives of persons significant in our past.
- C. Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- D. Have yielded, or may be likely to yield, information important in prehistory or history.

A final critical component of eligibility is integrity. Integrity is the ability of a property to convey its significance and whether the property retains the identity, including physical and visual attributes, for

which it is significant under the four basic criteria. The National Register criteria recognize seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association.

### *California Register of Historical Places*

The California Register of Historical Resources (California Register) is a state version of the National Register of Historic Places program. The California Register of Historical Resources was enacted in 1992, and became official January 1, 1998. The criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. The California Register also requires application of integrity of criteria paralleling National Register criteria, as described above, with one exception. Title 14 of California Code of Regulations §4852 (c) provides, "It is possible that historical resources may not retain sufficient integrity to qualify to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register." OHP has consistently interpreted this provision to require substantial integrity.

### *California State Historical Building Code*

The California State Historical Building Code (SHBC)<sup>1</sup> protects California's architectural heritage by providing alternative building regulations for the rehabilitation, preservation, restoration or relocation of structures designated as historic buildings. SHBC regulations are intended to facilitate restoration or accommodate change of occupancy so as to preserve a historic structure's original or restored architectural elements and features. While the code provides for a cost-effective approach to preservation, it also provides for occupant safety, encourages energy conservation and facilitates access for people with disabilities. To be qualified, designation must come from federal, state or local authority and be given any level of significance other than "not eligible". Listed below are some of the issues the SHBC addresses, with the intent of encouraging sensitive and cost-effective rehabilitation:

- Accessibility - Both the Americans with Disabilities Act and the SHBC make provisions for reasonable levels of equivalency for, and - under special circumstances - exemption from, accessibility mandates.
- Seismic/Structural - SHBC governs these issues, permitting design based on real values of archaic materials, and solutions based on engineering principles and judgment rather than on prescriptive formulas.
- Energy - Qualified historic buildings are exempt from California energy standards, which most vintage structures cannot meet without alteration or loss of historic features.

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<sup>1</sup> Quoted in part from information contained on the State Architect's website, including material available at:  
[http://www.dsa.dgs.ca.gov/SHBSB/shbsb\\_general.asp](http://www.dsa.dgs.ca.gov/SHBSB/shbsb_general.asp) and,  
[http://www.dsa.dgs.ca.gov/SHBSB/shbsb\\_incentives.asp](http://www.dsa.dgs.ca.gov/SHBSB/shbsb_incentives.asp).

- Triggers - The “triggers” for full upgrading to current standards, with respect to length of vacancy, change of occupancy, or percentage of value of the work proposed, and which exist in other codes, are not recognized by the SHBC, which concentrates instead on the sensitive resolution of genuine safety considerations.

## **Architectural Context and Environmental Setting**

### *History of Inglewood*

Prior to the arrival of the Spanish in California, the Los Angeles basin was inhabited by the Gabrielino Indians. The earlier explorers to the region arrived in 1769 with the Gaspar de Portola Expedition. In 1781, Mexican settlers under the direction of Spanish Governor Felipe de Neve founded El Pueblo de La Reina de Los Angeles. The vast acreage surrounding the pueblo in all directions was divided into numerous ranchos of various sizes during the Mexican period (1822 - 1848). The San Francisquito, Potrero Grande, and San Antonio ranchos were established east of the pueblo. Portions of the land to the north of the pueblo became part of Rancho San Rafael. The area in which the City of Inglewood is now located was part of the Rancho Aguahe de la Centinela and the Rancho Sausal Ranando. Of these two ranchos, the former was especially well known for its Centinela Springs, an abundant water source that supported vast pasture lands in the immediate area. Ignacio Machado was one of the first to settle permanently in the Rancho Aguahe de la Centinela, constructing what is today known as the still extant Centinela Adobe in 1834 for his growing family.

In 1850, California was admitted as the 31<sup>st</sup> state in the Union and, in the same year, the City of Los Angeles was formally incorporated. Many Americans flocked to California in hopes of finding gold. During the 1860s and 1870s, land to the west and north of the present-day Harbor Freeway (State Highway 110) was settled as Los Angeles began to expand. By the 1880s, southern California began attracting Midwesterners and Easterners with its new railroad lines. Streetcars also made possible development of residential neighborhoods beyond downtown Los Angeles during the late 1880s and early 1890s.

Ignacio Machado traded the Centinela Rancho to Bruno Avila in exchange for a modest parcel with a three-room house near downtown Los Angeles in the late 1840s. Avila lost the rancho to American Hilliard Dorsey in foreclosure for an unpaid mortgage loan. The property went through a number of hands in the following decades until Daniel Freeman, a young lawyer from Canada, obtained title to the now vast 25,000 acre ranch. Following the severe 1875-76 drought and the loss of a majority of his sheep, Freeman switched to the dry farming of barley and wheat. Freeman’s great success in dry farming and the nationwide export of his crops soon made him wealthy, leading to his prominence as the second president of the Los Angeles Chamber of Commerce and a charter member of the exclusive California Club. With the advent of the 1880s Southern California real estate boom, Freeman established the Inglewood-Centinela Land Company and sold 11,000 of his acres for development. In 1888, despite the recent collapse of the real estate market, the town of Inglewood was established.

For the next twenty years, until Inglewood was incorporated as a City in 1908, the town was known primarily as a rural agricultural community with a small downtown and less than 1,200 residents. However, the events of a few years earlier, in 1905, would have a profound impact on the growth of Inglewood in the coming decades. That year saw the arrival of Henry Huntington's Pacific Electric interurban railway with its famous red cars to Inglewood. As with other Southern California communities through which the red cars traversed, convenient access to Los Angeles and nearby recreational beach areas would make Inglewood a desirable suburban location for residential development. Also in 1905, the sprawling Inglewood Park Cemetery was established within the city limits. At the same time, an unusual Poultry Colony with its newly arrived colonists was established in North Inglewood that would become the City's chief industry for several decades.

During the first quarter of the 20<sup>th</sup> Century, the success of the motion picture business, discovery of oil within the region, a successful citrus industry, and a booming real estate market continued to entice immigrants, particularly Midwesterners, to the Los Angeles region. In 1920, a localized earthquake struck Inglewood that damaged a number of brick masonry buildings in the City. As a result, thousands of curious Angelenos arrived in the following days to witness the damage, which, it is said, led to a two-year doubling of its 3,286 population by visitors who returned to settle in the city. As Inglewood continued to grow economically and in population during the booming 1920s, it still retained its agricultural roots. In 1925, a Chinchilla farm was established that became a highly successful business and tourist attraction, achieving nationwide renown. The City of Los Angeles leased Inglewood's Andrew Bennett Ranch near the Pacific Ocean in 1927 for conversion into Mines Field (later LAX), a modest airport that hosted National Air Races starting in 1928 in which Charles Lindbergh was one of the flyers.

The Great Depression of the 1930s slowed Inglewood's growth, as it did in many communities of the Los Angeles region. Nonetheless, the 1932 Olympic Games, hosted by Los Angeles, saw three Inglewood High School alumni become medal winners (which is the origin of the City's slogan, "The City of Champions"). Following the approval of horse racing by the California State Legislature in 1933, Hollywood Park (the subject property) became the second thoroughbred racing complex to open in Los Angeles County in 1938. The first horse racing complex was Santa Anita in 1934.

Situated just south of the Inglewood city limits, Hollywood Park was a spectacular magnet for bringing attention to the Inglewood area due to the track's Hollywood celebrity connections. World War II served as the final catalyst in transforming the remaining remnants of Inglewood's agricultural past into wartime manufacturing plants and residential housing for thousands of newly arriving defense workers. After the war, Inglewood became a densely populated bedroom community similar to numerous others spread across the Los Angeles region. During the 1960s and 1970s, Inglewood became increasingly racially integrated following the outlawing of racial covenants in 1948. It also became known as the home of the Los Angeles Lakers basketball team following the construction of The Forum sports arena in 1967. A large new Civic Center containing City Hall, police and fire department headquarters, main library, County Courts, and County health facilities was constructed in 1973. Since that time, numerous businesses associated with the rapidly expanding air freight industry have located in Inglewood. Today, the City boasts a population of more than 100,000 residents.

### *California Racetracks*

The Great Depression of the 1930s was the catalyst necessary for the California state legislature to support the 1933 bill to legalize horse racing following a twenty-five year hiatus. The stated purpose of the racing law was the “encouragement of agriculture and breeding of horses,” and included a provision for the continuous funding of California’s County Fairs with a four percent annual allotment of racing revenues to be used for health, safety, and maintenance projects of the fairs and fairgrounds. Additionally, the new law regulated pari-mutuel wagering under the auspices of a newly established California Horse Racing Board. Further, the 1933 law required that four percent of revenues be earmarked for the benefit of California Polytechnic schools and the University of California. One year later, Bay Meadows Race Track in the San Francisco Bay Area became the state’s first thoroughbred pari-mutuel horse track to be completed. Its opening day was November 3, 1934. Santa Anita Racetrack in the San Gabriel Valley quickly followed Bay Meadows’ opening, becoming Southern California’s first thoroughbred pari-mutuel horse racing facility when it opened on Christmas Day in 1934. Santa Anita’s immediate success served as a beacon to other horseracing aficionados in Southern California, such as Bing Crosby, who along with other investors opened Del Mar Racetrack near San Diego in 1936. One of the movie industry’s most powerful moguls, Jack Warner of Warner Brothers Studios, was impressed with the success of the two tracks and proposed that another horse racing plant, to be known as Hollywood Park (the subject property), be built in Southern California. It opened in 1938. The last of the state’s thoroughbred racetracks to open was Golden Gate Fields near San Francisco in 1941. This sudden spur of interest from investors and racing enthusiasts was consistent with the tenor of the time when horse racing ranked second in popularity with Americans, outranked only by Major League Baseball.

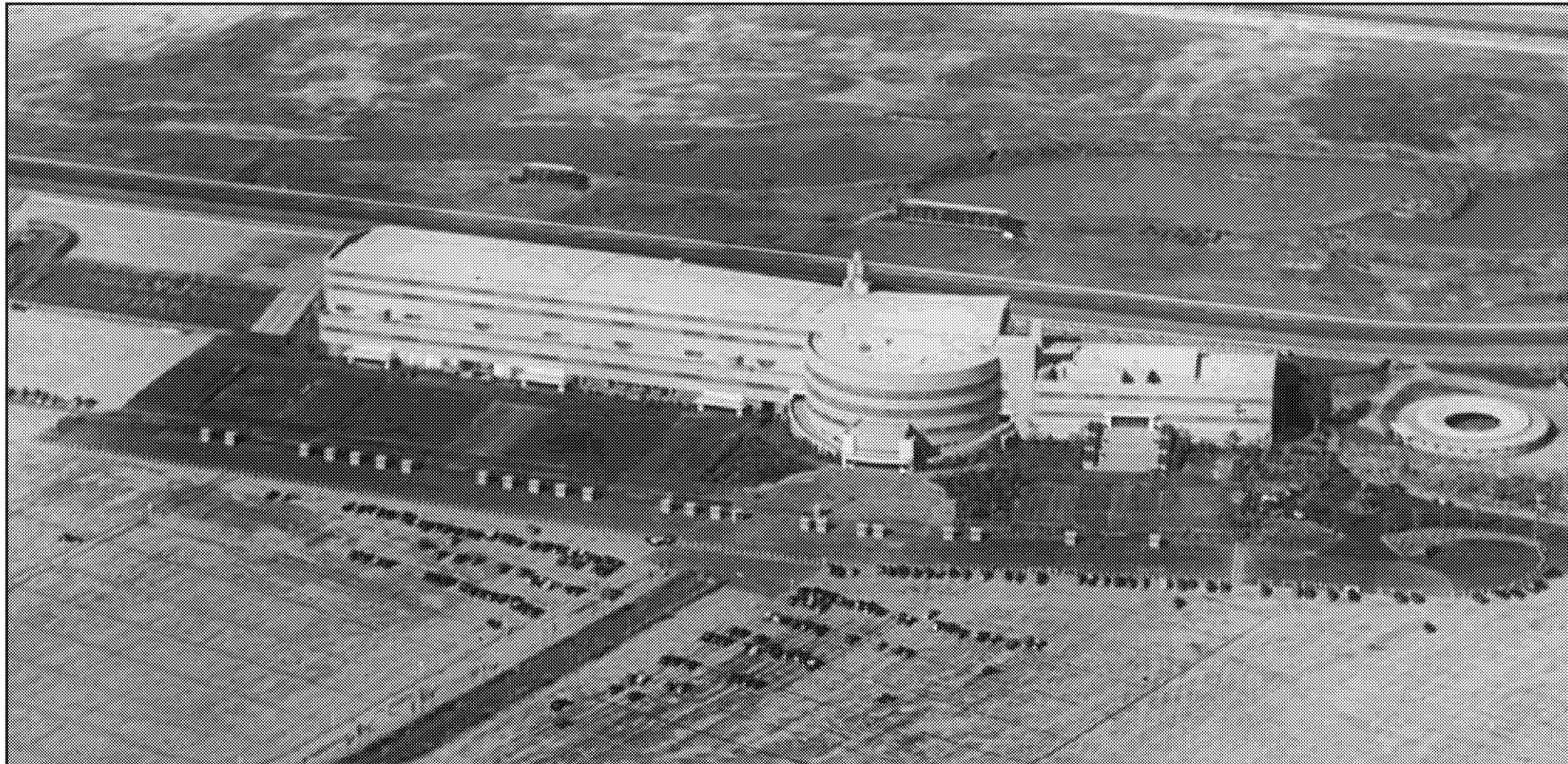
In Southern California, the racing season is currently divided as follows (although there have been modifications to the schedule over the years): Del Mar in summer, Hollywood Park in spring, summer and fall, and Santa Anita in fall and winter.

### *History of Hollywood Park Racetrack and Turf Club*

In 1936, under the leadership of Hollywood’s Jack Warner, the newly formed Hollywood Park Turf Club commenced selling blocks of stock in the venture to stars of the silver screen. Some of the entertainment industry’s most prominent members became investors, including Al Jolson, Ralph Bellamy, Edward G. Robinson, Joe E. Brown, Walt Disney, Daryl Zanuck, Sam Goldwyn, Mervyn LeRoy, and Jack Warner’s brother Harry. In fact, several early investors also started their own stables at this time, including Harry Warner, Mervyn LeRoy (Harry Warner’s son-in-law), Don Ameche, Barbara Stanwyck, and Zeppo Marx. However, the approval of a new track by the California Horse Racing Board was significantly delayed due to a successful lobbying campaign by Santa Anita Racetrack interests. Following several years of protracted struggle, the California Racing Board acquiesced in 1937, and granted a permit for the construction of the Hollywood Park Racetrack. The site chosen was a 315-acre bean field in the semi-rural City of Inglewood located just over the Baldwin Hills from the world’s glamour capital, Hollywood.

The Los Angeles Turf Club commissioned architect Stiles O. Clement to design the new Hollywood Park racetrack (See Figure IV.E-1, Historic Photograph of Hollywood Park, 1938). Opening day at Hollywood





Hollywood Park, 1938.

Source: Huntington Library Photograph Archives.



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Figure IV.E-1  
Historic Photograph of Hollywood Park, 1938

Park took place on June 10, 1938, and Hollywood's royalty turned out in full force, thus setting the tone for Hollywood Park as the racetrack of the stars. During the track's first season perhaps the most significant race was the inaugural \$50,000 Hollywood Gold Cup won by the nationally adored racehorse Seabiscuit and witnessed by over 35,000 fans. When the books were closed on that first successful thirty-four-day season at Hollywood Park, the total attendance was 551,333 with an average of almost \$500,000 in daily wagers, known as daily "handle." The animosity between Santa Anita and Hollywood Park continued through the 1939-1941 racing seasons, with each racetrack lobbying state officials for advantages in the number of racing days and seasonal schedules. Despite the bickering, both tracks provided excellent returns to their investors during these years. (see Figure IV.E-2 Historic Photographs of Hollywood Park, circa 1939-1940)

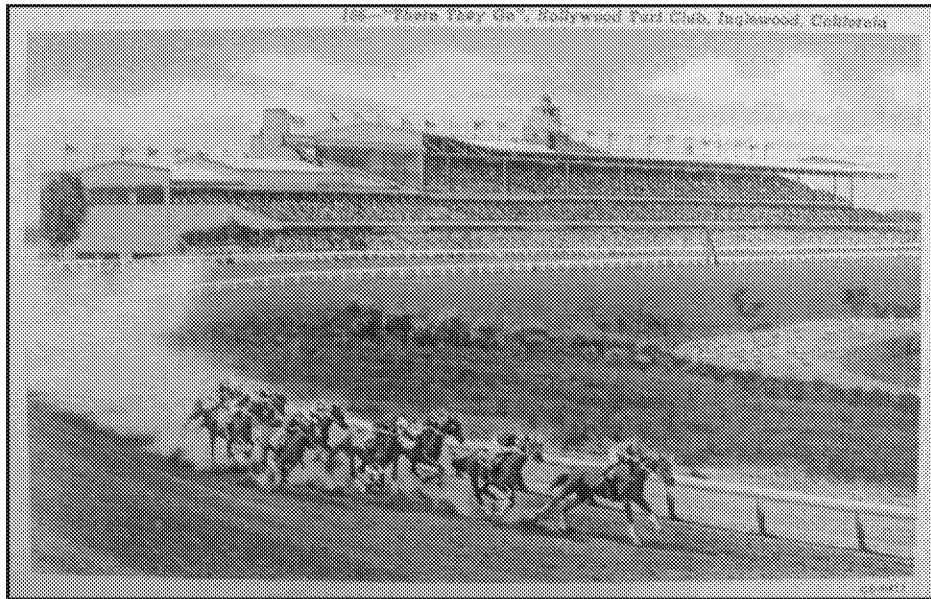
World War II interrupted racing at Hollywood Park. From 1942-44, the park was used as a storage facility in association with the war effort. Of the many jockeys closely associated with Hollywood Park, John Longden was one of the earliest jockeys to become widely regarded for his racing skill and track record of victories. In 1943, he won the Triple Crown with the horse Count Fleet, and then won the Hollywood Park riding title in 1945. He repeated this feat four more times before Willie Shoemaker arrived on the scene. In 1948, Longden won 105 races at the 55-day Hollywood Park meet, a record that stood for twenty-two years until Laffit Pincay broke it with 106 victories in 1971 during a meeting that was twenty days longer than when Longden had set his mark. In all, Longden chalked up 1,038 victories at Hollywood Park, including eighty-nine victories at stakes races. Before he retired in 1966 as history's all-time leading rider with 6,032 winning rides, he had registered success in four Hollywood Park Gold Cup races with the horses Noor, Royal Serenade, Correspondent, and Prince Blessed.

Hollywood Park was also the location of MGM mogul Louis B. Mayer's stable of champion thoroughbreds that produced consistent winners from 1940 until 1946; many of which were ridden by jockey John Longden. Mayer's stud farm in Perris, California was where he bred the famous racehorse Alibhai that produced consistent champions, including Cover Up (Hollywood Cold Cup winner in 1947), Solidarity (winner of the 1948 Hollywood Derby), On Trust (with lifetime winnings of over \$500,000), and Moonrush (Santa Anita Handicap winner), among others. However, in 1947, increasing demands on his time as head of MGM and an expensive divorce convinced Mayer to exit the horse business. He disposed of almost all of his holdings through a series of blockbuster auctions at Hollywood Park with attendance often surpassing 7,000. When the last horse was sold in 1950, a total of 248 thoroughbreds had been sold for \$4.5 million with "each of the half-dozen dispersal sales a production befitting the most powerful man in Hollywood."

During the last half of the 1940s, Hollywood Park continued to set attendance records. In addition to outstanding racing during meets, publicity was generated by Louis B. Mayer's dispersal sales, hosting the International Flower Show or the popular Huck Finn Day, the latter of which involved costumed children fishing in the track's lakes for prizes. Motion picture celebrities continued to frequent Hollywood Park with stars, such as Lana Turner, Hedy Lamarr, and Marlene Dietrich, often making trophy presentations. According to author Biff Lowry, "Weekend after weekend, pictures of twosomes such as Randolph Scott and Dorothy Lamour, Carole Landis and Franchot Tone, Olivia de Haviland and Jimmy Stewart, and Mickey Rooney and Judy Garland would be pictured in the rotogravure sections [of newspapers] enjoying



Racetrack and grandstands, circa 1939. View east from grandstands.  
Source: Los Angeles Public Library Historical Photograph Collection.



"There They Go." Postcard of Hollywood Park, circa 1940.  
Source: Los Angeles Public Library Historical Photograph Collection.



the races” at Hollywood Park. Racing was fun, and Hollywood Park was the place to see and be seen. In no small part, this was due to the influence of people, such as Mervyn LeRoy - one of Hollywood Park’s founding fathers and one of Hollywood’s top directors during this era. He was known to regularly invite stars to the track or to present trophies.

Following the departure of L.B. Mayer from the scene as a major owner and breeder of racehorses, Rex C. Ellsworth took the mantle as the “big man” at Hollywood Park. Ellsworth, along with his business partner and horse trainer Meshach Tenney, produced seventy-five stakes victories at Hollywood Park, which was “more stakes wins than any other owner in the long colorful history of the racetrack.” This remarkable accomplishment was due to Ellsworth’s horses, which were not the product of expensive, well-bred bloodlines; conversely, the Ellsworth’s stable winners were considered to be less than fashionably bred, raised, and trained. Some of Ellsworth’s most successful horses included Silver Cord, Arigotal, Roman In, Flying Choice, Overdrive, Khaled, U-Time, and Swaps. Of these, Swaps with jockey Willie Shoemaker in the saddle was perhaps the most famous, since the team won the Kentucky Derby over the favorite Nashua in 1955. Following the end of his racing career in 1956, Hollywood Park commissioned equine sculptor Albert Stewart to create a statue of Swaps, which was unveiled at the entrance to the Clubhouse where it graces the entrance to this day.

On May 6, 1949, just twelve days before opening day, a disastrous fire destroyed the majority of Hollywood Park’s Main Building. Due to the extensive damage, the 1949 meet was held at Santa Anita’s track in Arcadia. The reconstruction of the damaged portions of Hollywood Park was undertaken by architect Arthur Froehlich. (See photo 1 in Figure IV.E-3.) Froehlich’s work included the reconstruction and redesign of the Main Building (Grandstands, Clubhouse, Turf Club, Concessions, pari-mutuel betting areas, etc.), and the new construction of the Turf Club Entrance Pavilion. (See photos 2 and 3 in Figure IV.E-3.)

It was during the 1949 Hollywood Park/Santa Anita racing season that the great jockey Willie Shoemaker arrived in Southern California. It was the beginning of one of the most remarkable careers in the history of the sport, with Shoemaker becoming perhaps history’s greatest jockey. During his forty year career, Shoemaker won a total of 2,416 races just at Hollywood Park, eclipsed only by Laffit Pincay. Additionally, Shoemaker won five national riding championships, ten national money-winning titles, 250 victories in races worth \$100,000 or more, more than any rider in history. Further, his career wins numbered 8,833, and was considered to be the world record for twenty-nine years until Pincay broke it in 1999 at Hollywood Park.

From its opening in 1938 through the 1960s, the presidency of Hollywood Park passed from Beverly Hills developer Walter McCarty to oilman/real estate mogul Earl Gilmore (famous for his Gilmore Field ballpark in Los Angeles’ Fairfax District), and finally to the renowned film producer-director Mervyn LeRoy. During the 1960s, Hollywood Park continued to break its own attendance records and the park’s fame was stoked by numerous Willie Shoemaker wins and by the remarkable achievements of a horse called Native Driver and his trainer Buster Millerick. Native Driver won three straight Gold Cups, Hollywood Park’s signature race, prior to his premature death in 1967 at the age of eight. An ornate



**Photograph 1:** Hollywood Park, 1954.

Source: Huntington Library Photograph Archives.



**Photograph 2:** Grandstands, 1954.

Source: Huntington Library Photograph Archives.



**Photograph 3:** Turf Club entrance, 1957.

Source: USC Digital Archives.



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Figure IV.E-3  
Historic Photographs of Hollywood Park,  
circa 1954-1957

monument designed by the renowned Southern California-based artist and architect Millard Sheets marked Native Driver's grave near the track.

In the late 1960s, facing competition for the sports dollar from two major league baseball clubs, the Dodgers and Angels, plus the basketball Lakers and the NFL Rams, Hollywood Park and Santa Anita racetracks were desirous of more racing dates, particularly more Saturdays. Meanwhile, the harness racing interests, including Los Alamitos Racetrack in Orange County, were lobbying for a change in the racing law that prohibited racing at night. Starting in 1968, an agreement was reached whereby harness and quarter horse racing would be permitted to have night races.

Under this new agreement, Santa Anita and Hollywood Park obtained additional racing dates. Of the two thoroughbred tracks, Hollywood Park was alone in leasing its track for nighttime harness racing, which commenced in 1969. Two years earlier, in 1967, the Forum Arena became the new home of the Los Angeles Lakers and the National Hockey League Kings with its signature round building, erected directly north of Hollywood Park in Inglewood.

During the 1970s, Hollywood Park continued to have strong attendance and an average handle of \$3,000,000 per day. With jockey Laffit Pincay Jr. leading the field, newcomers appeared, including Chris McCarron who would eventually challenge Pincay for the top spot among jockeys. Equine luminaries, such as Triple Crown winners Affirmed and Seattle Slew, competed at Hollywood Park along with other Horses of the Year. Major renovations to Hollywood Park's Main Building included new exterior paint with a poorly received color scheme, best described as a combination of "Ringling Brothers" meets Ice Cream Parlor. By the end of the decade, Pincay remained Hollywood Park's top jockey.

The decade of the 1980s started well at Hollywood Park with attendance on the rise from a few years earlier. A cantankerous horse named John Henry dominated the field for the first half of the decade winning stakes races at each Hollywood Park meet. The horse drew big crowds to the racetrack, as did superstars such as Spectacular Bid and the ill-fated Landaluce. In contrast, the second half of the decade lacked any notable equine heroes with the charisma to stir the crowds. As a result, business went into a pronounced decline. Perhaps the most significant event of the 1980's for Hollywood Park was its hosting of the inaugural Breeders' Cup in 1984, which became one of the signature horseracing events in the sport; Hollywood Park hosted the event again in 1987 and 1997. Also, in 1984, a substantial investment was made in a new "Pavilion of the Stars" building with luxury suites and seating for 13,000 (now the Casino/Conference Center) located south of the Main Building.

The Pavilion was meant to bring a higher-end crowd back to horse racing at Hollywood Park. Unfortunately, this was not to be the case and by the end of the decade Hollywood Park's financial condition had become dire. In 1991, a new board of directors took over Hollywood Park following a protracted battle for control. The new management team immediately converted the Pavilion of the Stars into a simulcast racetrack and betting facility, and eventually a card club casino. During this time, the infield lakes were restored and an upgraded landscaping plan was implemented.

The last half of the 1990s included jockey Laffit Pincay's monumental accomplishment of eclipsing Willie Shoemaker's career victory record of 8,833 wins, the continued expansion of Hollywood Park into the gaming industry, and a failed attempt to purchase the Santa Anita Racetrack. As the 20<sup>th</sup> century came to a close, Hollywood Park was sold to the Churchill Downs family of tracks for \$140 million. However, attendance has continued to decline since that time. In 2005, the Bay Meadows Land Company purchased Hollywood Park for \$260 million, and one year later, a new 'Polytrack' racing surface was installed prior to the Fall 2006 season.

### *Architectural Description*

The Hollywood Park complex consists of a series of buildings and structures located around a central one-and-one-eighth mile oval-shaped racetrack. This complex includes a multi-story Main Building (inclusive of the grandstands, press box, Clubhouse, Turf Club, food service areas, wagering areas, and restrooms), a large complex of stable buildings (comprised of eighteen barns, dormitories, an equine clinic and research center, horseman's lounge, offices, and a half-mile training track), a large six-story grandstand and casino, and various outbuildings, including guard booths, ticket and wagering pavilions, and service buildings.

Main Building: The Main Building is a five-story building, measuring 1,450 feet in length, with an elongated plan, reinforced concrete foundation, and flat roof. The Main Building's north-south plan features three primary sections: the elongated grandstand area, comprising approximately two-thirds of the building's footprint; a circular tower; and the slightly "doglegged" Clubhouse and Turf Club wing at the south end.

Originally constructed in 1938, the Main Building was largely rebuilt in 1950 after a devastating fire, which destroyed most of the building above the ground floor and much of the original 1938 horse racing complex. Due to the fire, the new building was designed to be entirely fireproof, utilizing steel frame and reinforced concrete construction. The original 1938 Main Building was designed in the Streamline Moderne architectural style; however, the rebuilt 1950 version is stylistically Late Moderne, and has had numerous alterations and additions over the years, which have altered portions of the 1950s design.

The Main Building's primary façade faces west, and consists of the elongated rectangle, which contains the grandstand seating area. (See photo 1 in Figure IV.E-4.) This grandstand, located to the north of the circular tower, features a large, unadorned, horizontal façade that is punctuated by three rows of square window vents. (See photo 2 in Figure IV.E-4.) These vents, now covered by square wood panels decorated with multi-colored painted owners' silks, once provided airflow to the enormous multi-level grandstand seating area on the opposite side. (See photo 3 in Figure IV.E-4.) Interrupting this expanse are two tall projecting elevator shafts with west-facing ground level entrances. An uncovered second floor terrace enclosed by a concrete railing spans the width of this portion of the west façade with entrances to the grandstand seating. Several staircases with steps parallel to the building lead up to the second story terrace. The widest of these staircases is centered on the façade, and contains a row of electronic wagering windows.



**Photograph 1:** Main building, primary (west) facade. View northeast from parking lot. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 2:** Main building, detail of window vents on west facade, December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 3:** Detail of wood vent covers decorated with owners' silks, December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.





Flanking the staircases and elevator shafts beneath the terrace are numerous tunnels buttressed by curved, angled concrete piers leading through the building to the grandstand's lower levels, interior office areas, and the racetrack itself.

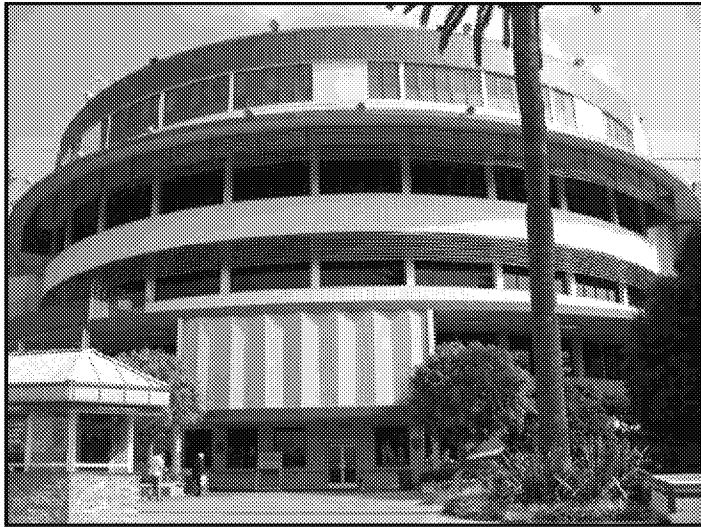
Multi-pane steel-sash casement windows provide light to the west-facing interior office areas adjacent to tunnel entrances. Above the grandstand section of the Main Building is a recessed fifth floor area that is sheltered by a flat roof with a canted, enameled, corrugated-steel fascia.

The circular tower, located south of the elongated grandstand area, is five stories in height and contains a portion of the Clubhouse. (See photo 4 in Figure IV.E-5.) The tower's ground floor level is characterized by a curved concrete ramp and a series of smaller window and door openings.

The upper stories are characterized by bands of steel-framed fixed windows. The curved concrete ramps are enclosed by concrete railings and steel posts, and lead up to the upper Clubhouse entrances. The ramps feature a large, bezeled, zigzag plaster panel that once supported abstract metal horse sculptures. A narrow (non-original) third story terrace is situated near the north end of the circular tower and is defined by a series of metal handrails. On the second and fourth floors is a curved, cantilevered canopy. On the third and fourth floors, the windows feature horizontal slat screens that provide additional shade. The tower's fifth floor was added in 1975, and features unsheltered bands of windows and a corrugated metal parapet with exterior lighting.

Located to the south of the circular tower is the angled Clubhouse and Turf Club wing. (See photo 5 in Figure IV.E-5) This wing is comprised of a series of projecting and recessed spaces and is the building's most architecturally complex façade. The Turf Club is demarcated by a tall enclosed staircase fronted by a non-original exterior elevator mechanism, and a non-original Regency style entrance canopy. To the south of this elevator is a perforated screen wall with a grid of circular openings and a ground floor entrance. (See photo 6 in Figure IV.E-5). Behind the screen wall is the three story elongated Clubhouse section, which is characterized by steel-sash ribbon windows, semi-circular trim on the first floor, and a corrugated metal canopy. The three-story Clubhouse is accessed by a pair of curved concrete steps with non-original pipe handrails, and a pair of non-original escalators. At the base of the stairs and escalators is a series of brick planters. The stair and escalator landing is covered by a flat, tongue-like canopy featuring a decorative oval cutout, a pair of round posts, and two soaring metal flagpoles.

Interconnected into this canopy and above the escalator is an awkward (non-original) ski-jumplike stucco canopy supported by angled metal posts. (See photo 7 in Figure IV.E-6.) Above the three-story Clubhouse is a non-original fourth floor addition that features a windowless rectangular façade and a wide band of metal-frame windows. The east façade of the Main Building (See photo 8 in Figure IV.E-6) is characterized by massive steel posts and an enormous metal-truss flat roof, which covers the Main Building's terraced grandstand seating area. Above the grandstand seating area is a wide, glazed structure containing the press box. Atop the roof in the same area as the press box are several small glazed sheds, which house track officials, the racetrack announcer, and other functions. Large floodlights span the width of the roof to illuminate the track during night races.



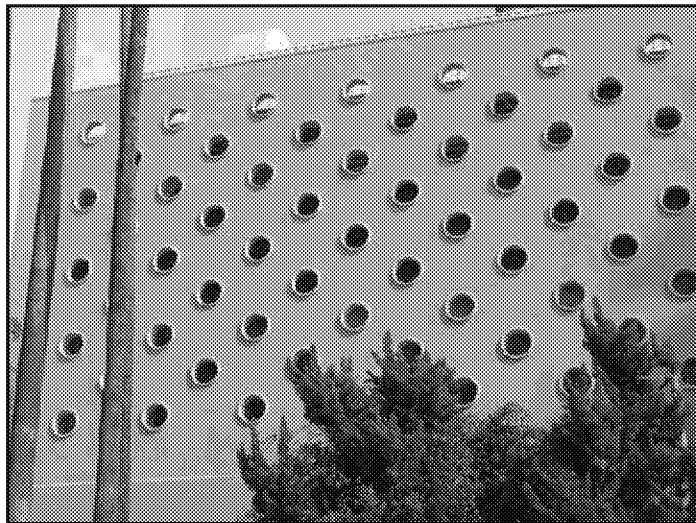
**Photograph 4:** Main building, circular Clubhouse tower. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 5:** Main building, Turf Club and Clubhouse wing. December 2006.

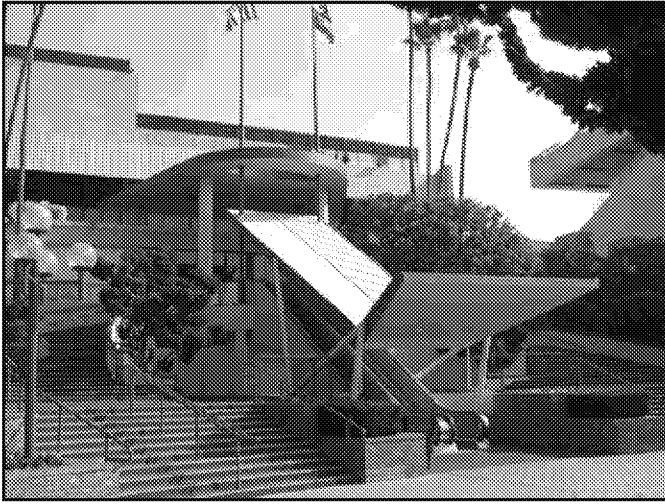
Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 6:** Detail of perforated screen wall of Turf Club. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.





**Photograph 7:** Main building, Clubhouse entrance. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 8:** Main building, grandstands. View northwest from racetrack. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 9:** Main building, north elevation. View southwest from racetrack. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 10:** Main building, Clubhouse wagering windows. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



The north façade of the Main Building reveals the wedge-shaped profile of the grandstand seating crowned by the building's corrugated steel roof (See photo 9 in Figure IV.E-6) The south façade is similar except for the incorporation of a glazed steel grid that protects Turf Club seats from coastal breezes.

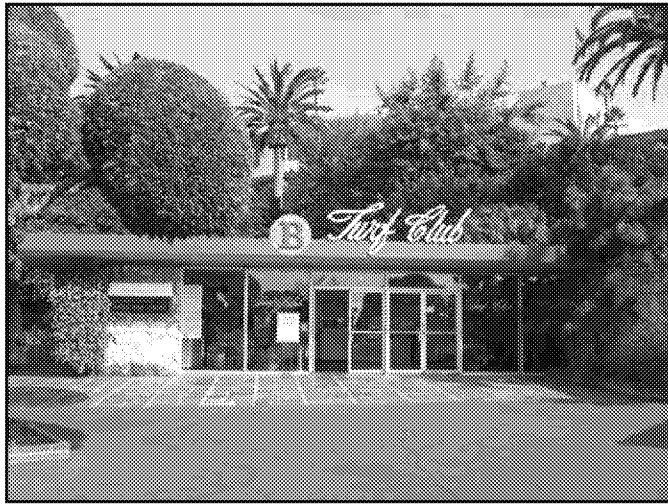
The seating arrangement for Hollywood Park includes areas adjacent to the Racetrack and the grandstand area of the Main Building. These seating areas are divided into several sections with the least expensive seats located on the open air asphalt pavement nearest the track followed by the numerous rows of covered grandstand seating occupying the north two-thirds of the structure. Box seats, the Clubhouse restaurant, and other more exclusive seats (with television monitors) front the Clubhouse and Turf Club on the south end of the structure. Wagering windows, concession areas, the food court, restrooms, and other public facilities are located behind the seating areas on most levels of the Main Building. (See photo 10 in Figure IV.E-6) The elite Turf Club offers a comfortable lounge, dining room, meeting areas, and other amenities. Since 1950, virtually all of the public areas within the Main Building have been remodeled and reconfigured numerous times.

Turf Club Entrance Pavilion: Completed in 1950, the Turf Club Entrance Pavilion (Gate B) is a small, elegant, freestanding pavilion, located west of the main Turf Club entrance towards the property's parking area. The Turf Club Entrance Pavilion is a one-story wood-frame building with a concrete foundation and flat roof, designed vernacular Moderne style structure. (See photo 11 in Figure IV.E-7) It has a rectangular plan, and is clad with stucco and Palo Verde rock. The building's main façade faces south and is largely characterized by floor to ceiling aluminum-framed plate glass windows, which flank a pair of glazed double-door entrances. Slate pavers front the entrance area and west elevation. Perched atop the flat canopy roof above the entrance doors are three-dimensional metal letters spelling "Turf Club," rendered in a period script typeface. Of the many buildings associated with Hollywood Park, the Turf Club Entrance Pavilion (Gate B) appears relatively unaltered with a very high level of historic and architectural integrity.

Hollywood Park Racetrack: Hollywood Park's main racetrack is one-and-one-eighth miles. The length of the final stretch from the last turn to the finish line is 990 feet. An infield turf course was added in 1967, and features a one-mile, 165-foot oval with a diagonal chute. In 2006, a new "Polytrack" racing surface was inaugurated for the park's fall meeting. In the center of the racetrack is an infield park containing two large lakes linked by a canal. (See photo 12 in Figure IV.E-7.) The park and lakes were reconfigured in 1991. Facing the Main Building's grandstand seating areas is the electronic Tote Board and a large color video screen. (See photo 13 in Figure IV.E-7)

The Winner's Circle is a formally landscaped area between the track and the Clubhouse seating area, where each race's winning horse, jockey, and others are congratulated and photographed.

Paddock: The Paddock is an outdoor area near the Winner's Circle. According to the original 1938 design, the Paddock was located in the circular tower at the structure's ground floor level. In the 1950 reconstruction, the Paddock was relocated to its current location. Today, the Paddock includes a walking ring that is situated in the plaza area outside the grandstand near Hollywood Park's main pedestrian



**Photograph 11:** Turf Club Entrance Pavillion (Gate B), southwest (primary) facade. View northeast from parking lot. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 12:** Racetrack and infield area. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 13:** Racetrack and infield area, detail of tote board and video screen. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 14:** Pavilion of the Stars. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



entrance pavilions. The former indoor Paddock was reconfigured and the circular space filled with offices and maintenance facilities.

Horse Stables & Training Track: An entire complex of horse facilities is located on the east side of the main racetrack. These facilities include eighteen barns with 1,958 stalls, 619 tack rooms, 216 feed rooms and accommodation for 489 grooms; the Equine Clinic and Research Center, which features an operating theater, recovery stalls, and laboratory facilities; and a half-mile oval training track.

Pavilion of the Stars: Completed in 1984, the Pavilion of the Stars (formerly known as the Cary Grant Pavilion) is located to the south of the Main Building, and is a large six-story building with grandstand seating, concrete frame construction, and a flat roof. (See photo 14 in Figure IV.E-8) The building is characterized by its scored concrete exterior, six-story pedestrian ramp, and its hot pink decorative panels. In 1994, the Pavilion of the Stars was expanded with a spacious two-story casino. (See photo 15 in Figure IV.E-8) The design of this new addition draws upon the Late Moderne architectural style, and features neon signage, a large canopy with glass-block posts, and aluminum cladding with speed line decoration. The Pavilion of the Stars is connected to the Main Building by an elevated walkway.

Landscape Features: Hollywood Park features numerous landscape features, which are contained within the area between the park's freestanding ticket booths and the Main Building, and within the inner ring of the racetrack. The site's landscape features include Canary Island Date Palms, sculpted olive trees, clipped hedges, grassy lawns, a large circular fountain, red brick planters, park benches, and red brick paved walkways. Additionally, several prominent memorials have been erected. The largest memorial is the bronze sculpture of the great thoroughbred Swaps with jockey Willie Shoemaker located in the Clubhouse entrance garden. (See photo 16 in Figure IV.E-8) This sculpture is attached onto the west face of a marble slab that also features a replica of the Hollywood Gold Cup trophy and a list of all Hollywood Gold Cup winners since the 1938 opening. The design and setting of this monument was completed by renowned Southern California architect and artist Millard Sheets, while the bronze sculpture was completed by artist Albert Stewart. It was dedicated July 1, 1958, in honor of Swaps' four Hollywood Park track records (three of them world marks), including seasonal money-won record, first race winner, first stakes winner, and nine career stakes wins at Hollywood Park.

The other prominent monument is located within the landscaped Garden Paddock and marks the burial place of Native Driver, the only three-time winner of the Gold Cup and California's first \$1 million winner. (See photo 17 in Figure IV.E-8) The twenty-foot long ceramic tile monument, also designed by Millard Sheets, celebrates Native Driver's successive Gold Cup triumphs from 1965-67. The monument was erected after Native Driver's sudden death in September, 1967, and was dedicated on April 11, 1969. Native Driver holds record of ten career stakes wins at Hollywood Park.

### *Late Moderne Style*

The Main Building of Hollywood Park erected in 1950 is a good example of a large building designed in the Late Moderne architectural style typical of the early postwar years in Southern California. World War II essentially halted the evolution of architectural styles, such that immediately following the war, until



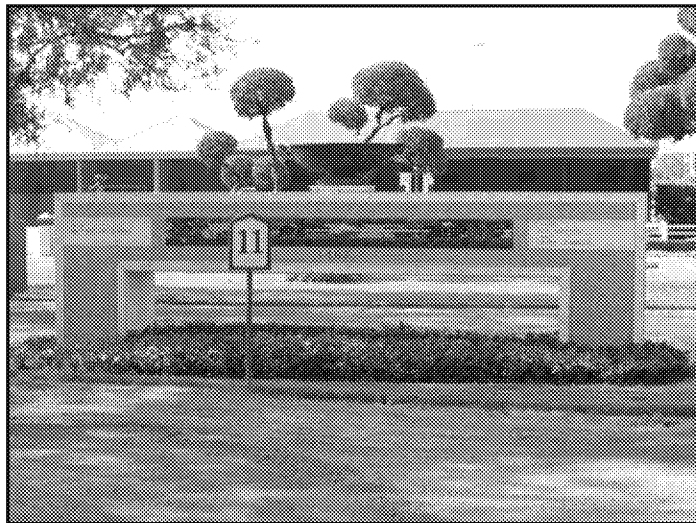
**Photograph 15:** Hollywood Park Casino. View northeast from parking lot. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 16:** Hollywood Gold Cup/Swaps monument. View east from Clubhouse entrance garden. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



**Photograph 17:** Native Driver monument. View from Garden Paddock, December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



the early 1950s, many Southern California commercial buildings were strongly influenced by architectural designs popular in the late 1930s. The Late Moderne style was based on a blend of the International Style of architecture with the Streamline Moderne architectural style. The result was a stylistic melding of the curve and teardrop forms of the Streamline Moderne complemented by the sharp angularity of the International Style. Notably, Hollywood Park's original Main Building, which had been designed by architect Stiles O. Clements in 1938, but destroyed by fire in 1949, was an exceptional example of Streamline Moderne styling. Its curved forms and horizontal window banding were key character-defining elements of the idiom. It is not surprising, therefore, given the acclaimed success of the original design, that architect Arthur Froehlich's 1950 Late Moderne design of the new Main Building would be influenced by its predecessor.

The Late Moderne style of the late 1940s and early 1950s typically featured smooth stucco surfaces with horizontal window bands often accentuated by bezels. Excellent representative examples of the Late Moderne style of the time period in Southern California include the Mirror Building at Second and Spring Streets (1948, Roland H. Crawford) and the General Petroleum Building at 612 South Flower Street (1947, Wurdeman and Becket), both located in downtown Los Angeles, and the Milliron Department Store at 8739 Sepulveda Boulevard located in nearby Westchester (1949, Gruen and Krummeck).

Character-defining features of the Late Moderne style exhibited by Hollywood Park's Main Building include:

- An emphasis on horizontality, as expressed by the continuous window bands of the curved Clubhouse tower;
- The cantilevered, curved canopy sheltering the Clubhouse's fourth floor window bands;
- The grid of square windows framed by prominent bezels since covered by painted wooden owners' silks punctuating the grandstand's west elevation;
- The wide bezeled fourth floor window, located south of the Clubhouse tower;
- The projecting curved canopy with the oval cutout that partially shelters the curving staircase leading to the main Clubhouse entrance;
- The blocky International Style vertical Turf Club elevator tower (now fronted by an exterior elevator) situated south of the Clubhouse tower;
- The large bezeled zigzag plaster panel centering the Clubhouse ramps that once supported a semi-abstract herd of galloping racehorses rendered in metal (since removed); and
- The remaining ground floor steel frame casement windows.

Prior to its numerous alterations and additions, the Main Building was a good example of the blending of the pre-war Streamline Moderne and soon-to-be dominant postwar International Style as expressed in a large building.



## Evaluation of Historic Significance

### *Period of Significance*

Under the early leadership of movie mogul Jack Warner, the Hollywood Park Turf Club enlisted prominent members of Southern California's entertainment industry in the financing of the third and last thoroughbred horseracing facility in the region. Following Hollywood Park's completion in 1938, MGM studio head Louis B. Mayer became a renowned horse breeder with stables directly associated with Hollywood Park. In the late 1940s, the dispersal of Mayer's world famous stable was a spectacular multi-year event held at the facility. During its first few decades, Hollywood Park was the site of numerous noteworthy races featuring horses such as the beloved Seabiscuit as well as Triple Crown winner Count Fleet and Kentucky Derby winner Swaps. Acclaimed jockeys John Longden, Willie Shoemaker, and Laffit Pincay Jr. achieved great success at races held at Hollywood Park from the 1940s through the 1990s. Some of the film industry's biggest stars who were regularly invited to the track or to present trophies by then-Hollywood Park president and renowned film producer-director Mervyn LeRoy.

Additionally, well-known horse breeders, including Rex C. Ellsworth and trainer Meshach Tenney, became intimately associated with the property, since their stable produced seventy-five stakes victories at Hollywood Park. In 1984, Hollywood Park was the site of the inaugural Breeders' Cup, which quickly became one of the most prestigious events in thoroughbred racing nationwide. It appears that Hollywood Park's important contributions to the history of thoroughbred horseracing in Southern California constitute a period of significance spanning the years 1938 to 1950. Even though Hollywood Park was the site of the inaugural Breeders' Cup in 1984, the period of significance does not span from Hollywood Park's opening in 1938 to the Breeders' Cup in 1984 because while an important event, the inaugural Breeders' Cup was not significant enough in the overall history of Hollywood Park given that the event is not a yearly Hollywood Park event; it is held at different locations every year.

### *National Register*

As discussed in the Regulatory Setting section, in order for a property to be eligible for listing in the National Register, it must be found significant under one or more of the following criteria: Event, Persons, Design/Construction, and Information Potential. In addition to possessing significance, a property must also be found to possess historic integrity. Hollywood Park Turf Club and Racetrack is evaluated against each of the four criteria, below:

Criterion A (Event): Hollywood Park is eligible for listing in the National Register under Criterion A (Events) as a property associated with events that have made a significant contribution to the broad patterns of our history. Hollywood Park was the fourth thoroughbred racetrack to be built in California, and is significant on a local level as one of three thoroughbred racetracks located in Southern California. Its significance is associated with the history of thoroughbred horse breeding and racing in Southern California. For the entirety of its history, Hollywood Park was directly associated with prominent horse breeders and racing stables; it was the site of numerous famous horse races and series; and was the site of prominent jockey's successes.

Criterion B (Person): Hollywood Park is not eligible for listing in the National Register under Criterion B (Person) since the property has not been associated with the lives of significant persons. Although many entertainment industry executives and celebrities were associated with Hollywood Park over the years, federal and state criteria require that the property be the location that best illustrates the important lifetime achievements of the individual. For Hollywood's luminaries, the subject property does not meet this criterion. For similar reasons, the majority of jockeys, breeders, and trainers associated with Hollywood Park were also affiliated with the region's two other thoroughbred racetracks such that the subject property cannot make a unique claim to their important achievements.

Criterion C (Design/Construction): Hollywood Park is eligible for listing in the National Register under Criterion 3 (Architecture) as a property that represents the work of a master, Arthur Froehlich. Hollywood Park was the first of many horse-racing facilities that Arthur Froehlich, FAIA designed during a long career in which he became known as the world's premier racetrack architect. Froehlich's work includes many of the most renowned racetracks of the past half-century, including the renovations at Hollywood Park (Reconstruction completed in 1950), Aqueduct Racetrack in Jamaica, New York (Rebuilt in 1959), Belmont Park in Elmont, New York (Rebuilt between 1963 and 1968), and Meadowlands in East Rutherford, New Jersey (1976) in the United States. Froehlich also designed Venezuela's Hipodromo and horse racing facilities in France, Canada, and other parts of the world. Of these, the Hipodromo in Venezuela was Froehlich's most advanced and innovative horseracing facility with its dramatic cantilevered grandstand canopy. Froehlich was responsible for renovating and rebuilding the majority of the racetracks on the East Coast according to his own designs, which was similar to his role at Hollywood Park. Hollywood Park was Froehlich's first racetrack commission, and is much more conservative and traditional in comparison with his later work exemplified at the Hipodromo. Froehlich was able to design and explore some of his earlier design ideas and propensities towards the Late Moderne architectural style in Hollywood Park.

Criterion D (Information Potential): The evaluation of Hollywood Park for listing in the National Register under Criterion D (Information Potential) is beyond the scope of the Historic Resources Technical Report. Given its determined period of significance, Hollywood Park is not considered a resource likely to yield information important to pre-history or history.

### *California Register*

As discussed in the Regulatory Setting section, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. In addition to possessing significance, a property must also be found to possess historic integrity. Hollywood Park Turf Club and Racetrack is evaluated against each of the four criteria, below:

Criterion 1 (Event): As a property determined eligible under National Register Criterion A (Events), Hollywood Park is considered significant under California Register Criterion 1 (Event).

Criterion 2 (Persons): Hollywood Park is not eligible for listing in the California Register under Criterion 2 (Persons), since the property has not been associated with the lives of persons important to local, California or national history.

Criterion 3 (Architecture): As a property determined eligible under National Register Criterion C (Design/Construction), Hollywood Park is considered significant under California Register Criterion 3 (Architecture).

Criterion 4 (Information Potential): The evaluation of Hollywood Park under California Register Criterion 4 (Information Potential) is beyond the scope of the Historic Resources Technical Report and thus not applicable to this analysis. However, Hollywood Park is not considered a resource likely to yield information important to history or pre-history.

### *Integrity*

As discussed in the Regulatory Setting section, in order to qualify for listing in the National Register or California Register, a property must possess significance under one of the aforementioned criteria and have historic integrity. The process of determining integrity is similar for both the California Register and the National Register. The same seven variables or aspects that define integrity—location, design, setting, materials, workmanship, feeling and association—are used to evaluate a resource's eligibility for listing in the California Register and the National Register.

### *Integrity-National Register*

Hollywood Park does not retain sufficient historic integrity to qualify for listing in the National Register of Historic Places. Due to the 1949 fire at Hollywood Park, little fabric remains from the original design of the 1938 Main Building. In 1950, Arthur Froehlich undertook a reconstruction of Hollywood Park's Main Building. This reconstruction is significant as a representation of Arthur Froehlich's first work on a racetrack. Despite the significance of the 1950 Reconstruction, the property's integrity of design, materials, and workmanship has been substantially compromised due to numerous alterations and new construction that occurred after the period of significance. These alterations have included, but are not limited to, the installation of the exterior escalators and staircase in the Clubhouse (1954), the addition of the perforated screen wall (1961), the addition of the fifth floor on the Main Building (1975), and the new construction of new horse barns and tack rooms (1980).

The various alterations have largely affected much of the original Late Moderne detailing. The building's affected Late Moderne elements have included the horizontal emphasis, primarily achieved by the continuous window bands of the curved Clubhouse tower (since altered by the addition of an ungainly fifth story); the cantilevered, curved Clubhouse fourth floor canopy (similarly affected by the fifth story addition); the grid of square windows framed by prominent bezels on the grandstand's west elevation (since covered); the wide bezeled fourth floor window located south of the Clubhouse tower; and the projecting curved canopy with oval cutout at the top of the Clubhouse entry staircase (negatively impacted by the addition of a sloping escalator canopy).

*Integrity-California Register*

Even with the integrity threshold at the state level, Hollywood Park does not appear to retain sufficient historic integrity to qualify for listing in the California Register. In general, the alterations, demolition and new construction to the Main Building, the site, and the majority of the outbuildings have caused a negative effect upon the property's integrity of design, setting, materials, and workmanship. Alterations include the addition of an entire fifth floor to the roof of the Clubhouse tower, Turf Club, and the Clubhouse wing, which has had an especially deleterious effect on architect Arthur Froehlich's 1950 design; the addition of an exterior elevator to the Turf Club staircase tower; the erection of an exterior perforated wall south of the Turf Club staircase tower; the construction of the sloping ski jump-like canopy between the Clubhouse entrance staircases; the covering of all square louvered windows with "owners' silks" on the Main Building's west elevation; the enclosure of the Clubhouse loggia; the addition of red brick planters fronting the Main Building's entrance areas; the construction of the Regency style Turf Club pavilion elevator entrance; and the removal of the semi-abstract herd of galloping metal racehorses from the large beveled zigzag plaster panel centering the Clubhouse tower ramps.

Additional impacts to the surrounding site include the alterations to the lakes and landscaping of the infield track; the relocation of the Paddock to the Main Building's front entrance area; the replacement of virtually all of the original barns, stables, and dormitories located on the east side of the racetrack; and the complete remodeling of food and beverage concession areas, pari-mutuel betting windows, and other public areas of the Main Building. Additionally, a large and highly prominent five-story grandstand Pavilion/Casino erected in 1984/1994 situated near the south end of the Main Building has compromised the spatial relationships of the subject property's original layout. Due to these enumerated modifications, the character-defining features of the subject property's Late Moderne architectural style have also been negatively affected.

Overall, the property's historic integrity has been eroded to the point that the property does not convey its historical significance, which has been defined as the period from 1938 to 1950. Even though the overall property does not possess historic integrity, individual buildings and features do remain that are strong in their association with Park's history. These buildings and elements include the Turf Club Entrance (Gate B), the spatial relationships between the Main Building and racetrack, and the overall character of the property as a racetrack.

Although Hollywood Park was found to be significant under National Register Criterion A (Events) and Criterion C (Design/Construction), and California Register Criterion 1 (Events) and Criterion 3 (Architecture), the property was not found to possess sufficient historical integrity to qualify it for listing in the National Register or California Register. In order for a property to be eligible for listing in the National or California Registers, the property must possess significance under one of the aforementioned criteria and retain historic integrity. The numerous alterations, demolitions, and new construction at Hollywood Park have affected the property's historic integrity to the point that it no longer conveys its historical significance. Despite the lack of historic integrity, important monuments, buildings, and

features still exist, which do have special historic character. Since Hollywood Park is not eligible for listing in the National or California Registers, it is not considered a historic resource pursuant to CEQA.

### **Cultural Resources Records Search**

A cultural resources records search for the Hollywood Park Redevelopment Project was conducted in July 2007 by the South Central Coastal Information Center, California Historical Resources Information System, California State University, Fullerton, Department of Anthropology. This survey included a review of all recorded cultural resource reports on file. In addition, the California Points of Historical Interest (PHI), the California Historical Landmarks (CHL), the California Register of Historic Resources (CR), the National Register of Historic Places (NR), and the California State Historic Resources Inventory (HRI) listings were reviewed for the Hollywood Park Project Site. The following includes a summary of the findings.

#### *Archaeological Resources*

The South Central Coastal Information Center concluded that no archaeological sites or isolates have been recorded on the Project Site or within a ½-mile radius of the Project Site.

#### *Historic Resources*

The California Point of Historical Interest (2006) of the Office of Historic Preservation, Department of Parks and Recreation, lists no properties within a ½-mile radius of the Project Site.

The California Historical Landmarks (2006) of the Office of Historic Preservation, Department of Parks and Recreation, lists no properties within a ½-mile radius of the Project Site.

The California Register of Historic Resources (2006) lists no properties within a ½-mile radius of the Project Site.

The National Register of Historic Places lists no properties within a ½-mile radius of the Project Site.

The California Historic Resources Inventory (2006) lists 14 properties that have been evaluated for historical significance within a ½-mile radius of the Project Site.

#### *Previous Cultural Resource Investigations*

Four studies (LA179, LA2904, LA4385, and LA6035) have been conducted within a ½-mile radius of the Project Site. Of these none are located within the Project Site. There are 10 additional investigations that are located within the Inglewood 7.5' U.S.G.S. Quadrangle that are potentially within a ½-mile radius of the Project Site. The reports are not mapped due to insufficient information.

## ENVIRONMENTAL IMPACTS

### Methodology

The potential impacts of the Proposed Project upon cultural resources are evaluated in the context of significant historic and archaeological resources as defined in Section 15064.5 of the State CEQA Guidelines (Determining the Significance of Impacts to Archeological and Historical Resources).

In accordance with Section 15064.5(b) of the CEQA Guidelines, a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

### Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would:

- (a) Cause a substantial adverse change in the significance of a historical resources as defined in § 15064.5.
- (b) Cause a substantial adverse change in the significance of a unique archaeological resource (as defined in Section 21083.2(g) of the California Public Resources Code);
- (c) Disturb any human remains, including those interred outside of formal cemeteries; or
- (d) Directly or indirectly destroy a unique paleontologic resource or site.

A lead agency must consider a property a historic resource under the California Environmental Quality Act if it is eligible for listing in the California Register of Historical Resources. The California Register is modeled after the National Register of Historic Places. In addition, a property is presumed to be historically significant if it is listed in a local register of historic resources or has been identified as historically significant in a historic resources survey.

### **Impacts Determined to be Less Than Significant**

Threshold questions (a) through (d) are addressed below.

#### **Project Impacts**

The Proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5. Based on the findings and conclusions of the Historic Resources Technical Report, Historic Resources Survey, Evaluation, and Analysis of Project Impacts, Final, Hollywood Park Project, California (dated July 24, 2007), none of the buildings on the Project Site are classified as a historic resource pursuant to CEQA. Nevertheless, as part of the Proposed Project, the Applicant plans to relocate the Turf Club Entrance Pavilion, Gate B, and the park's two primary monuments, Hollywood Gold Cup/Swaps and Native Driver. These Project Design Features (PDFs) are therefore recommended to be incorporated into the proposed Specific Plan as conditions of approval (See PDF E-1 and PDF E-2, below). As none of the buildings on the Project Site are classified as a historic resource pursuant to CEQA, the Project will have a less than significant impact on historic resources.

The Proposed Project would not cause a substantial adverse change in the significance of an archaeological resource as defined in § 15064.5. Based on the records search analysis conducted by the South Central Coastal Information Center there are no known recorded archaeological sites or isolates on the Project Site or within ¼ mile of the Project Site. As such, the likelihood of encountering any significant archaeological resources during the grading and excavation phase is low. Nevertheless, since the Proposed Project will result in a substantial amount of earthwork during the grading phases, a potentially significant impact could occur if the grading activities results in the accidental discovery of any unrecorded and/or unknown archaeological resources. In accordance with Section 21082 of the Public Resources Code, a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction. Accordingly, Mitigation Measure E-1 is recommended to ensure that measures are in place to avoid or mitigate any unforeseen impacts to archaeological resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.

The Proposed Project would not disturb any human remains, including those interred outside of formal cemeteries. The Proposed Project Site is currently developed with horseracing and casino-related facilities and is not known to contain any interred human remains. As such, no impacts are anticipated. Nevertheless, since the Proposed Project will result in a substantial amount of earthwork during the grading phases, a potentially significant impact could occur if the grading activities results in the accidental discovery of any unrecorded and/or unknown buried human remains, including those of Native

Americans. In accordance with the recommendations provided by the Native American Heritage Commission in response to the NOP, implementation of Mitigation Measure E-2 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to Native American remains in the unlikely event that such remains are accidentally discovered during the earthwork activities.

The Proposed Project would not directly or indirectly destroy a known unique paleontologic resource or site. No known unique paleontologic resources or sites are recorded or known to be located on site or in the immediate project vicinity. Therefore no impacts are anticipated. Nevertheless, unforeseen impacts to paleontological resources may result from project implementation due to the extent of grading during the construction phases. As such, implementation of Mitigation Measure E-3 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to paleontologic resources should any such materials be accidentally discovered during the earthwork activities.

### **Land Use Equivalency Program**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site, and within the proposed land use areas as shown on Figure II-4, Proposed Preliminary Land Use Plan. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's Circulation Plan, building pad elevations, or the depth of excavation. Potential changes in land use under the Equivalency Program would therefore have no substantial effect on the proposed earth moving activities and their associated impacts because all that is changing is the type of use occupying a building.

All of the recommended mitigation measures to minimize impacts on cultural and archaeological resources would be applicable to the Equivalency Program, as well as the Proposed Project. Since excavation and building placement would be the same as the Proposed Project, and the mitigation measures would be the same, potential impacts on cultural and archaeological resources would be the same. Thus, with respect to cultural and archaeological resources, the implementation of the Equivalency Program would result in less than significant impacts, which would be the same as the Proposed Project.

### **CUMULATIVE IMPACTS**

Implementation of the proposed project in combination with the related projects would result in the continued development (or redevelopment) of residential, commercial, and office land uses in the City of Inglewood. Impacts to historical resources tend to be site-specific and are assessed on a site-by-site basis. A cultural resources records survey was performed to identify any previously recorded cultural resources including historic and archaeological resources within a ½-mile radius of the Project Site. Since it is unknown whether any of the related projects would result in significant impacts to cultural resources, a historic resources evaluation would need to be performed on a site by site basis to assess each project's impact upon significant historic, archaeological or paleontological resources. Similar to the proposed



project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of each of the related projects would be required to implement the appropriate mitigation measures. Based on the findings presented above that no historical, archaeological or paleontological resources were found on the Project Site, the Proposed Project would not contribute to any cumulative impact upon cultural resources. Cumulative impacts would therefore be less than significant.

## **PROJECT DESIGN FEATURES**

The following PDFs are proposed to be incorporated into the project description. As such, it is recommended that the lead agency incorporate the following project design features as conditions of project approval.

- PDF E-1. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve the Turf Club Entrance Pavilion Gate B, so that it later can be relocated on the Project Site.
- PDF E-2. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve Hollywood Park's two primary monuments, Hollywood Gold Cup/Swaps and Native Driver, so that they later can be relocated to Bluff Park as an entry pavilion.

## **MITIGATION MEASURES**

Although the structures located on the Project Site are not considered significant historic resources pursuant to CEQA, and thus no mitigation measures are required, the following Mitigation Measures (MM) have been identified so that the history of the track may be appropriately documented:

- MM E-1. Should any unknown archaeological materials be encountered during the course of the project development, construction activities shall be halted in the area of discovery to allow the monitor to determine the significance of such materials. The services of a professional archaeologist shall be secured to assess and evaluate the impact upon any significant archaeological resources and make recommendations to the Planning Director. Copies of any archaeological surveys, studies or reports documenting any archaeological resources found or recovered on site shall be submitted to the South Central Coastal Information Center, California Historical Resources Information System, California State University, Fullerton, Department of Anthropology.
- MM E-2. In the event of the unlikely accidental discovery or recognition of any human remains during construction, the following steps should be taken: (1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: (A) The Los Angeles County Coroner is contacted to determine that no investigation of the cause of death is required, and (B) If the coroner determines the remains to be Native American the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall notify the person or persons it believes to be the most likely descended

from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98 and in accordance with California Health and Safety Code Section 7050.5. Excavation and/or earthwork activities may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains or cultural resources.

MM E-3. If any paleontological materials are encountered during the course of the project development, the project shall be halted in the area of discovery and the services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With respect to threshold question (a), the Proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 and no impact would occur. Nevertheless, PDFs E-1 and E-2 above are recommended to retain elements of the Project Site's historic uses. As a result, the Proposed Project would result in a less than significant impact to historical resources.

With respect to threshold question (b), while there are no known recorded archaeological sites or isolates on the Project Site or within ¼ mile of the Project Site, MM E-1 is recommended to ensure that measures are in place to avoid or mitigate any unforeseen impacts to archaeological resources in the unlikely event that such resources are accidentally discovered during the earthwork activities. As a result, the Proposed Project would result in a less than significant impact to archaeological resources.

With respect to threshold question (c), the Proposed Project Site is not known to contain any interred human remains. As such, no impacts associated with disturbance to any human remains, including those interred outside of formal cemeteries are anticipated. Nevertheless, implementation of MM E-2 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to Native American remains in the unlikely event that such remains are accidentally discovered during the earthwork activities. As a result, the Proposed Project would result in a less than significant impact to interred human remains.

With respect to threshold question (d), no known unique paleontologic resources or sites are recorded or known to be located on site or in the immediate project vicinity. Therefore no impacts to paleontologic resources are anticipated. Nevertheless, implementation of MM E-3 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to paleontologic resources should any

such materials be accidentally discovered during the earthwork activities. As a result, the Proposed Project would result in a less than significant impact to paleontologic resources.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### F. HYDROLOGY/WATER QUALITY

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#### INTRODUCTION

This section describes existing hydrology and water quality in the project area and its immediate surroundings and discusses the federal state and local regulations and standards that govern impacts to hydrology, water quality and drainage. Following a description of the existing conditions and regulations, potentially significant impacts associated with the Proposed Project are identified, along with mitigation measures to reduce project impacts. Unless otherwise noted, the following section summarizes the findings and conclusions as presented in the following technical reports: Hollywood Park Project, Utilities and Infrastructure Technical Report, Hall & Foreman, August 29, 2008; Hollywood Park EIR Technical Appendix – Hydrology, Hall and Foreman Inc., June 2008; Hollywood Park Water Quality Technical Report, Geosyntec Consultants, May 2008, and Pace Advanced Water Engineering, Technical Memorandum, June 12, 2008. The Hall and Foreman Inc. Utilities and Infrastructure Technical Report is included in its entirety in Appendix F-1 to this EIR. The Hall and Foreman Inc. hydrological technical study is included in its entirety in Appendix F-2 to this EIR. Geosyntec Consultants' water quality technical report is included in its entirety in Appendix F-3 to this EIR. The Pace Advanced Water Engineering, Technical Memorandum is included in its entirety in Appendix F-4 to this EIR.

#### Stormwater Guidelines

The following set of stormwater standards have been sourced and are incorporated herein by reference:

- Hydrology Manual, Los Angeles County Department of Public Works, January 2006.
- Los Angeles County Flood Control District, Guidelines for Connection Permits, Los Angeles County Department of Public Works, March 2006.
- Design Manual Hydraulic, Los Angeles Country Flood Control District, March 1982.
- Development Planning for Stormwater Management, A Manual for the Standard Urban Stormwater Mitigation Plan (SUSMP), Los Angeles County Department of Public Works, September 2002.
- Guidelines for Connection Permits, Los Angeles County Flood Control District, Los Angeles County Department of Public Works, March 2006; and
- California Division of Safety of Dams, Jurisdictional Dam Size, The Resources Agency, Department of Water Resources, California Water Code Division 3, 1995.

## ENVIRONMENTAL SETTING

### Regional Setting

#### *Dominguez Watershed*

The Project Site is located within the Dominguez Watershed which drains via a network of on-site and off-site Los Angeles County storm drains into the Dominguez Channel, to the Dominguez Channel Estuary and eventually into the Los Angeles Harbor and the Pacific Ocean. The Dominguez Watershed is comprised of approximately 133 square miles of land in the southern portion of Los Angeles County.<sup>1</sup> Approximately 96% of its total area is developed. As a result, rather than being defined by the natural topography of its drainage area, the Dominguez watershed boundary is defined by a complex network of storm drains and smaller flood control channels.<sup>2</sup>

### Existing Water Quality Conditions

#### *Surface Water*

The Los Angeles Regional Water Quality Control Board (LARWQCB) has placed the Dominguez Channel on the State's 303d list of impaired water bodies for several constituents including pesticides, metals, bacteria, and organic compounds. Some constituents are based directly on impairments to water quality, while others are based on the accumulation of pollutants in sediment and tissue of aquatic organisms. There are two reaches of Dominguez Channel current listed on the 303d list. The first reach (i.e., the Dominguez Channel Estuary) is the estuary portion of the channel, which stretches from the mouth at Los Angeles Harbor to Vermont Street in Gardena. The second reach (i.e., the Dominguez Channel) stretches from Vermont Street to approximately the Highway 105 corridor where the channel becomes a network of subsurface storm drains.

Beneficial uses within the Dominguez Channel Estuary include: water contact recreation; non-water contact recreation; commercial and sport fishing; estuarine habitat; marine habitat; terrestrial wildlife habitat; rare, threatened, or endangered species; migration of aquatic organisms; and spawning, reproduction, and/or early development. Navigation is a potential beneficial use within the Dominguez Channel Estuary as well. Beneficial uses within the Dominguez Channel include rare, threatened, or

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<sup>1</sup> County of Los Angeles Department of Public Works, *Hydrology Manual*, 2006, website: [http://ladpw.org/wrd/Publication/engineering/2006\\_Hydrology\\_Manual/2006%20Hydrology%20Manual-Divided.pdf](http://ladpw.org/wrd/Publication/engineering/2006_Hydrology_Manual/2006%20Hydrology%20Manual-Divided.pdf) September 11, 2007

<sup>2</sup> County of Los Angeles Department of Public Works, website: [http://ladpw.org/wmd/watershed/dc/current\\_cond.cfm](http://ladpw.org/wmd/watershed/dc/current_cond.cfm), accessed April 25, 2007.

endangered species, while potential beneficial uses include: municipal and domestic supply; water contact recreation; non-water contact recreation; warm freshwater habitat; and terrestrial wildlife habitat.

Los Angeles County has a mass emissions station for Dominguez Channel (S28) located at Artesia Boulevard in the City of Torrance. This station is upstream from the tidally-influenced portion of the channel and has an upstream tributary area of approximately 33 square miles. This station has been monitored since 2001 during both wet and dry weather conditions and data indicate that it repeatedly exceeds applicable water quality objectives (WQOs) for bacteria (fecal coliform, enterococcus, and total coliform), metals (copper, lead, and zinc), and diazinon, as determined by Los Angeles County Department of Public Works (LACDPW). WQOs are based on the Los Angeles Region Basin Plan (Basin Plan), California Toxic Rule (CTR), and the Ocean Plan. Total maximum daily loads (TMDLs) have not yet been developed for this watershed, but the State is in the process of developing metals and toxics TMDLs.<sup>3</sup>

### *Groundwater*

As defined in the Basin Plan, the Project Site is located within the West Coast Groundwater Basin (i.e., West Coast Basin) of the Los Angeles Coastal Plain. Beneficial uses within the West Coast Basin include: municipal and domestic supply; agricultural supply; industrial service supply; and industrial process supply.

## **Existing Hydrologic Conditions**

### *Existing Drainage*

The Project Site is predominantly covered with impervious surfaces with soft landscaped areas limited to within the Main Track (including two man-made lakes) and Training Track areas only. The Project Site topography slopes from the north-east to south-west corner, elevations at these locations are approximately 200 and 90-feet respectively. The Project Site is within Flood Zone C of the FEMA map, which denotes areas subject to minimal flooding and determined to be outside the 500-year flood plain.<sup>4</sup>

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<sup>3</sup> See: [http://www.swrcb.ca.gov/rwqcb4/html/meetings/tmdl/tmdl\\_ws\\_dominguez.html](http://www.swrcb.ca.gov/rwqcb4/html/meetings/tmdl/tmdl_ws_dominguez.html).

<sup>4</sup> Hollywood Park Third Party Due Diligence for Strockbridge Capital Partners, LLC, September 23, 2005 Marx/Okubo, Property Condition Assessment, Hollywood Park, September 7, 2005 – Insurance Report, CBCInnovis, Determination Report, 07/21/2005, Hollywood Park

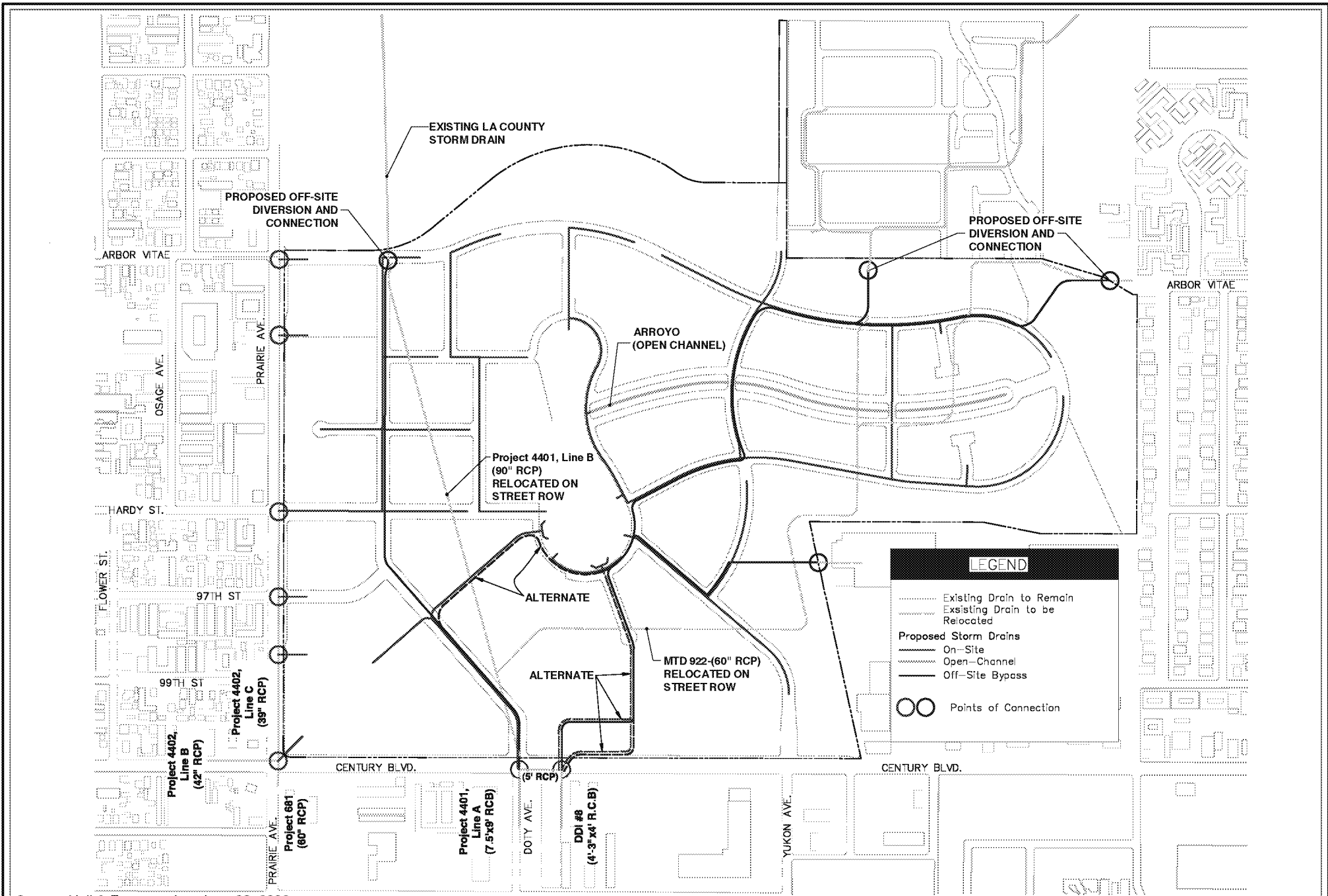
As shown in Figure IV.F-1, stormwater runoff is collected by a series of three existing on-site storm drains known as Project 4402 (Line C), Project 4401 (Line B) and MTD 992.

- Project 4402 (Line C) is a 32-inch diameter storm drain that flows south along Prairie Avenue which collects runoff flowing into Prairie Avenue from off-site properties as well as from the western edge of Hollywood Park. It connects to a 60-inch storm drain (Project 681) located at Century Boulevard and continuing south on Prairie Avenue.
- Project 4401 (Line B) is a 90-inch storm drain which collects off-site runoff from the north of the Project Site. It is located in the western portion of the parking lot and drains to one of two outlets located at Century Boulevard: Project 4401 (Line A), a 7.5' high x 9' wide storm drain box or Project DDI #8, a 4' high x 4'3" wide reinforced concrete box.
- MTD 922 is a 60-inch storm drain which accepts on-site and off-site runoff from three locations on the eastern side of the property including Home Depot/Target, Watt Development and Darby Park. It drains to one of the two outlets mentioned above.

Project 4402 (Line C) and Project 4401 (Line B) are owned by the County of Los Angeles Department of Public Works. MTD 992 is privately owned and operated by the Hollywood Park Racing Association.

There are two types of private storm drainage collection systems currently used on-site:

1. On- and off-site surface water discharge to Los Angeles County storm drains, via a private on-site storm drain as described above.
  - Stormwater falling onto roofs is collected by internal roof drains directly connected to the underground system, MTD 922 storm drain. Site drainage surface flows to area drains or surface drains to the surrounding public right of way. Area drains and trench-type drainage is provided at various locations throughout the property. The MTD 922 runs through the horse stables area and connects to the LACDPW storm drain known as Project 4401 at a point located west of the Casino and conveys the flows to Century Blvd. and then south along Doty Ave.
2. A closed system with no off-site discharge, in which stormwater is treated on site and stored in lined retention ponds where it evaporates or is used for on-site irrigation and dust suppression.
  - Runoff that has the potential to come in direct contact with the horses and their fecal matter is captured by an on-site tertiary wastewater treatment system which is then disinfected and conveyed to North Lake in the main track infield. It is currently designed to accommodate three consecutive 25-year, 24-hour storms.



Source: Hall & Foreman, Inc. June 23, 2008.





### *Hydrologic Volumes (Runoff)*

As required by the Los Angeles County Department of Public Works (LACDPW) the  $T_c$  Calculator Method, also known as the Modified Rational Method, was employed to quantify the Project Site's existing rate of discharge. The Modified Rational Method uses a design storm and a time of concentration to calculate runoff periodically throughout the event. Using this method, hydrologists can model attenuation, channel storage, and determine where flows combine and peak accordingly. The LACDPW requires storm drain facilities to be designed to accommodate an Urban Flood, a 25-year storm which has a 100 percent chance of happening every 25 years. Using the LACDPW Inglewood 25-year storm, 24-hour isohyet (4.6 inches) and associated runoff coefficient curve for the existing soil type 013, the report determined that the existing site contributes a runoff total of 2780.5 cubic feet per second (cfs) to the offsite storm drain systems during a 25-year storm event. Of this total, 77.4 cfs are routed to Project 681 and 4402 (Line C) with the remaining 203.1 cfs to Project 4401 (Line A) and DDI #8.

The results are depicted in Table IV.F-1, Summarized Flows. Table IV.F-1 also summarizes total (on and off site) existing flows into the existing system, as well as total hydraulic pipe capacity.

**Table IV.F-1  
Summarized Flows**

<b>Item</b>	<b>Project 681 and 4402 (CFS)</b>	<b>Project 4401 (Line A) and DD1 + 8 (CFS)</b>	<b>Total (CFS)</b>
Hydraulic Capacity of Pipeline per As-Built Plans	184.2	974	1158.2
Existing off-site 10-year Flow into Pipeline per off-site hydrology	37	504	541
Existing On-site 25-year Flow into Pipeline ( $T_c$ Calculator Method)	77.4	203.1	280.5
Remaining Capacity	69.8	266.9	336.7

A review of the pipe hydraulics and hydrology determined that the existing pipelines are adequate to carry the amount of stormwater that currently flows through them as illustrated in Table IV.F-1. Furthermore, the LACDPW provided a confirmation of the hydraulic design capacity and allowable flow rates of discharge to each of the storm drains located downstream. LACDPW determined the Project Site is allowed to contribute 358.1 cfs to the storm drain system. Estimated flows under  $T_c$  Calculation method and utilizing Pondpack software for Project 4401 and DDI#8 (190.3 cfs) are less than both the LACDPW values (358.1 cfs) and existing flows (280.5 cfs). These results are depicted in Table IV.F-2, Allowable Runoff Rates. Due to the existing runoff and pipe capacity it is determined that the Project Site is well within their volume restriction.

**Table IV.F-2  
Allowable Runoff Rates**

Item	Project 681 CFS	Project 4401 (Line A) and DDI#8 (CFS)
On-site Flow into Pipeline (Tc Calculator Method)	77.4	203.1
Proposed On-Site 25-year Flow into Pipeline (T <sub>c</sub> Calculator, Pond Pack)	65.8	124.5
LACDPW Allowable Flow Rates	72.1	286
<i>Source: Hydrology Technical Report, Hall and Foreman Inc., 2008.</i>		

### ***Surface Waters***

There are two constructed infield lakes on the property which are connected by a concrete canal. The North Lake is clay lined and the south lake is lined with PVC. The upper bank slopes of North Lake are lined with concrete and the south with gunnite, to prevent erosion from wave action. The lakes were created for aesthetic purposes, and were originally filled from well water and by precipitation. Currently, however, the lakes are filled with reclaimed water from horse wash down, supplemented by precipitation. Washdown water either flows or is pumped into the north lake first, where it is allowed to settle. Water then flows into the north end of the south lake through a weir and filter. Once it enters the south lake, water flows to the south end and is recirculated back to the north end by a pump. The water is managed to prevent algal growth by a combination of aeration and chemicals. No water is discharged into the storm drain system. There is no surface water connection to any jurisdictional waters, therefore these areas would not be subject to U.S. Army Corps of Engineers jurisdiction as waters of the U.S.<sup>5</sup>

### ***Pollutants of Concern***

Stormwater runoff and pollutant discharges increase with urbanization due to the increase in impervious surfaces (such as roof tops and driveways), which reduces infiltration of rainfall. As a result, rainfall runs off at accelerated rates, carrying with it a wide variety of pollutants in the process which are eventually transported into the municipal separate storm sewer system (MS4). Pollutants associated with urban runoff can be generally categorized as solids, oxygen-demanding substances, nutrients (nitrogen and phosphorus), pathogens, organics associated with fuels and other petroleum products (e.g., diesel, polycyclic aromatic hydrocarbons (PAHs)), metals, and synthetic (xenobiotic) organics. Common sources of urban stormwater pollutants include: streets and right-of-ways, parking lots and driveways,

<sup>5</sup> *Hollywood Park Third Party Due Diligence for Stockbridge Capital Partners, LLC September 23, 2005 WRA Environmental Consultants, Evaluation of Potential Section 404 Jurisdictional Areas, August 25, 2005.*

lawns, residential and commercial landscaping, construction activities, atmospheric deposition, soil erosion, animal wastes, automobiles, bridges, industrial areas, corroding metal surfaces, combustion processes, vehicle maintenance areas, gas stations, illicit dumping to storm drains, automobile emissions, leaky sanitary sewer lines and cross-connections, septic systems, and detergents.

## **Regulatory Framework**

### *Federal Water Pollution Control Act*

The 1972 amendments to the Federal Water Pollution Control Act, later referred to as the Clean Water Act (CWA), prohibit the discharge of any pollutant to navigable waters of the United States from a point source unless the discharge is authorized by a National Pollution Discharge Elimination System (NPDES) permit. In 1987, the CWA was amended to require that the United States Environmental Protection Agency (U.S. EPA) establish regulations for permitting of municipal and industrial stormwater discharges under the NPDES permit program. In addition, the CWA requires the States to adopt water quality standards for receiving water bodies and to have those standards approved by the U.S. EPA. Phase I regulations associated with the NPDES program and water quality standards are discussed in more detail below.

### *NPDES Program - Phase I (MS4s)*

In 1990, the U.S. EPA promulgated final regulations that established Phase I requirements for the NPDES program to address, among other discharges, non-point source discharges from large construction activities of five acres or more of land. Under Phase I of the NPDES stormwater program, stormwater discharges have been primarily regulated for (1) 10 categories of specific industrial activities; (2) construction sites disturbing five acres of land or greater; and (3) medium and large municipal separate storm sewer systems (MS4s) generally serving populations greater than 100,000 persons.

In 2001, the LARWQCB issued an NPDES permit and Waste Discharge Requirements under the CWA and the Porter-Cologne Act to the County of Los Angeles and the cities located therein (except Long Beach, which has its own permit) for urban runoff discharges in public storm drains in Los Angeles County. This permit specifically provides that:

*Federal, state, regional or local entities within the Permittee's boundaries or in jurisdictions outside the Los Angeles County Flood Control District, and not currently named in this Order, may operate storm drain facilities and/or discharge storm water to storm drains and watercourses covered by this Order.<sup>6</sup>*

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<sup>6</sup> Los Angeles Regional Water Quality Board, Order No. 01-182, effective December 13, 2001.

The Permittees are the Los Angeles County cities and the County (collectively “the Co-Permittees”). This permit requires that the municipalities adopt regulatory requirements governing a variety of developments within their jurisdictions and regulates stormwater discharges from MS4s in the Project Area. The NPDES permit details requirements for new development and significant redevelopment, including specific sizing criteria for treatment Best Management Practices (“BMPs”) and flow control requirements. To implement the requirements of the NPDES permit, the Co-Permittees have developed planning guidance and control measures that control and mitigate stormwater quality and quantity impacts to receiving waters as a result of new development and redevelopment. They are also required to implement other municipal source detection and elimination programs, as well as maintenance measures. The Los Angeles County MS4 Permit was last amended on September 14, 2006 by Order R4-2006-0074.

#### *Stormwater Quality Management Program (SQMP)*

The NPDES Permit contains provisions for implementation of the Stormwater Quality Management Program (SQMP) by the Co-Permittees. The primary provisions of the SQMP are described in detail in the water quality technical report (see Appendix F-2 of this Draft EIR). The SQMP states that Permittees are required to implement the most effective combination of Best Management Practices (BMPs) for stormwater/urban runoff pollution control. The objective of the SQMP is to reduce pollutants in urban stormwater discharges to the Maximum Extent Practicable (MEP) in order to attain Water Quality Objectives (WQOs) and to protect the beneficial uses of receiving waters in Los Angeles County.

#### *Standard Urban Stormwater Mitigation Plan (SUSMP)*

In 2000, the development planning program requirements, including the Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, were approved by the Regional Water Quality Control Board (“RWQCB”) as part of the MS4 program to address stormwater pollution from new construction and redevelopment.<sup>7</sup> The SUSMP requirements went into effect six months following Regional Board approval. The SUSMP is updated as needed in accordance with the MS4 Permit. The SUSMP was last revised in September 2002. The SUSMP contains a list of minimum BMPs that must be employed to infiltrate or treat stormwater runoff, control peak flow discharge, and reduce the post-Project discharge of pollutants from stormwater conveyance systems. Based upon land type, the SUSMP defines the types of practices that must be included and issues that must be addressed as appropriate to the development type and size. Compliance with SUSMP requirements is used as one method to evaluate the significance of a Proposed Project’s impacts on surface water runoff.

The County of Los Angeles’ 2000 Manual for the Standard Urban Stormwater Mitigation Plan (Manual) details the requirements for new development and significant redevelopment BMPs. The Manual is a

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<sup>7</sup> Los Angeles Regional Water Quality Board, *Standard Urban Storm Water Mitigation Plan for Los Angeles County and Cities in Los Angeles County, approved by the Regional Board Executive Officer March 8, 2000.*

model guidance document for use by Permittees and individual project owners to select post-construction BMPs and otherwise comply with the SUSMP requirements. It addresses water quality and drainage issues by specifying design standards for structural or treatment control BMPs that infiltrate or treat stormwater runoff and control peak flow discharge.<sup>8</sup> Treatment BMP design criteria and guidance are also contained in the MS4 Permit, the Manual, and in the LACDPW's Technical Manual for Stormwater Best Management Practices in the County of Los Angeles (February 2004).

One of the most important requirements within the SUSMP is the specific sizing criteria for stormwater treatment BMPs for new development and significant redevelopment projects. The SUSMP includes sizing criteria for both volume-based and flow-based BMPs. (See Appendix F-3 of this Draft EIR for a list of sizing criteria options for each of these BMPs.) The SUSMP also includes general design specifications for individual priority project categories. These include:

- Single-family hillside homes;
- 100,000 square foot commercial developments;
- Restaurants;
- Retail gasoline outlets;
- Automotive repair shops; and
- Parking lots

For example, commercial developments must have properly designed loading and unloading dock areas, repair and maintenance bays, and vehicle equipment wash areas. Restaurants need to have properly designed equipment and accessory wash areas. Parking lots must be properly designed to limit oil contamination and have regular maintenance of parking lot stormwater treatment systems (e.g., storm drain filters and biofilters).

#### *Construction General Permit*

Pursuant to the CWA Section 402(p) (which requires regulations for permitting of certain stormwater discharges), the State Water Resources Control Board (SWRCB) has issued one statewide NPDES General Permit for Stormwater Discharges Associated with Construction Activity (Construction General

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<sup>8</sup> *BMPs are defined in the Manual and the SUSMP as any program, technology, process, sizing criteria, operational methods or measures, or engineered systems, which, when implemented, prevent, control, remove, or reduce pollution.*

Permit)<sup>9</sup> to apply to all construction activities. Under this Construction General Permit, effective March 2003, stormwater discharges from construction sites with a disturbed area of one or more acres are required to either obtain individual NPDES permits for stormwater discharges or be covered by the Construction General Permit. Coverage under the Construction General Permit is initiated by completing and filing a Notice of Intent (NOI) with the SWRCB. Landowners are responsible for obtaining and complying with the permit, but may delegate specific duties to developers and contractors by mutual consent. For construction activities, the permit requires landowners or their designated agent to (a) eliminate or reduce non-stormwater discharges to stormwater systems and other waters of the United States, (b) develop and implement a Stormwater Pollution Prevention Plan (SWPPP) prior to grading and implemented during construction, and (c) perform inspections of stormwater control structures and pollution prevention measures. The primary objective of the SWPPP is to identify, construct, implement, and maintain BMPs to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the construction site during construction. SWPPPs prepared in compliance with an NPDES Phase I Permit describe site erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of post-construction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls. Dischargers are also required to inspect construction sites before and after storms to identify stormwater discharge from construction activity, and to identify and implement controls where necessary. Compliance with the requirements of the Construction General Permit is used as one method to evaluate a project's construction-related impacts on surface water quality.

#### *General Dewatering Permit*

The LARWQCB has issued a General NPDES Permit and General Waste Discharge Requirements (WDRs) governing construction-related dewatering discharges within the project development areas (General Dewatering Permit).<sup>10</sup> This permit addresses discharges from temporary dewatering operations associated with construction and permanent dewatering operations associated with development. The discharge requirements include provisions mandating notification, sampling and analysis, and reporting of dewatering and testing-related discharges. The General Dewatering Permit authorizes such construction-related activities so long as all conditions of the permit are fulfilled. Compliance with the requirements of the General Dewatering Permit is used as one method to evaluate a project's construction-related impacts on surface water quality.

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<sup>9</sup> State Water Resources Control Board, *National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity*, April 26, 2001.

<sup>10</sup> State Water Resources Control Board, *Order No. R4-2003-0111, NPDES No. CAG994004*.

### ***Total Maximum Daily Load (TMDL)***

The CWA requires the States to adopt water quality standards for receiving water bodies and to have those standards approved by the U.S. EPA. Water quality standards consist of designated beneficial uses for a particular receiving water body (e.g. wildlife habitat, agricultural supply, fishing etc.), along with water quality criteria necessary to support those uses. Water quality criteria are either prescribed concentrations or levels of constituents such as lead, suspended sediment, and fecal coliform bacteria, or narrative statements which represent the quality of water that support a particular use.

When designated beneficial uses of a particular receiving water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as “impaired.” Once a water body has been deemed impaired, a TMDL must be developed for the impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a “factor of safety” included). Once established, the TMDL allocates the loads among current and future pollutant sources to the water body.

### ***California Toxics Rule (CTR)***

The CTR is a federal regulation (40 CFR 131.38) issued by the U.S. EPA in 2000 promulgates criteria for priority toxic pollutants in the State of California for inland surface waters and enclosed bays and estuaries. CTR criteria are applicable to the receiving water body and therefore must be calculated based upon the probable hardness values of the receiving waters for evaluation of acute (and chronic) toxicity criteria. At higher hardness concentrations, copper, lead, and zinc are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and consequently, the toxicity potential of these metals.

Due to the intermittent nature of stormwater runoff (especially in Southern California), the acute criteria are considered to be more applicable to stormwater conditions than chronic criteria and therefore are used in assessing a project’s impacts. For example, the average storm duration in the 56-year rainfall record from Los Angeles International Airport (NCDC gauge # 045114) is 9 hours where discrete storm events are defined as periods of rainfall followed by a period of no rainfall for at least 6 hours. However, it should be noted that typical storm events include periods of no rainfall that are not long enough to define a separate storm event, but during which runoff may temporarily cease. Acute criteria represent the highest concentration of a pollutant to which aquatic life can be exposed for a short period of time without deleterious effects; chronic criteria equal the highest concentration to which aquatic life can be exposed for an extended period of time (four days) without deleterious effects. While durations of stormwater runoff are expected to frequently exceed one hour, stormwater runoff exposure durations are expected to be on the order of hours rather than days. Hence, the acute criteria are deemed more applicable to stormwater runoff.

### ***Porter-Cologne Water Quality Control Act***

The federal CWA places the primary responsibility for the control of surface water pollution and for planning the development and use of water resources with the states, establishing certain guidelines for the states to follow in developing these programs. It also allows the U.S. EPA to withdraw control from states if their implementation mechanisms are found to be inadequate. In California, the NPDES program is administered by the SWRCB through nine Regional Water Quality Control Boards (RWQCBs). The SWRCB and the RWQCBs were established in 1969 by the Porter-Cologne Water Quality Control Act, the principal law governing water quality regulation in California. The Porter-Cologne Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product. Each RWQCB must formulate and adopt a Water Quality Control Plan (Basin Plan) for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and by the SWRCB in its state water policy. The Porter-Cologne Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste.

### ***Los Angeles Basin Plan (Basin Plan)***

The LARWQCB's 1994 Basin Plan, as amended, provides quantitative and narrative objectives for a range of water quality constituents applicable to certain receiving water bodies and groundwater basins within the Los Angeles Region. Specific objectives are provided for the larger, designated water bodies within the region, as well as general criteria or guidelines for ocean waters, bays and estuaries, inland surface waters, and ground waters. In general, the narrative objectives require that degradation of water quality does not occur due to increases in pollutant loads that will adversely impact the designated beneficial uses of a water body. For example, the Basin Plan requires that "inland surface waters shall not contain suspended or settleable solids in amounts which cause a nuisance or adversely affect beneficial uses as a result of controllable water quality factors." WQOs apply within receiving waters as opposed to applying directly to runoff; therefore, WQOs from the Basin Plan are utilized as benchmarks as one method to evaluate the potential impacts of a project's runoff on the receiving waters.

The Basin Plan also contains water quality criteria for groundwater basins. For example, the Basin Plan requires that "ground waters shall not contain taste or odor producing substances in concentrations that cause nuisance or adversely affect beneficial uses."

### ***Hollywood Park NPDES Permits***

The RWQCB – Los Angeles Region issued a Waste Discharge Requirements and NPDES Permit to Churchill Downs California Company (Hollywood Park Racing Association) on November 9, 1999. The Hollywood Park stables meet the definitions of both a concentrated animal feeding operation (CAFO) and



a 'feedlot' because over 500 horses are stabled for over 45 days per year and forage growth does not exist in the stables. The stables are also a confined animal facility because the stables confine horses that do not graze.

Hollywood Park Land Company, LLC applied for a new permit in August 2004. The RWQCB-Los Angeles issued a new waste discharge requirement permit under the NPDES to Hollywood Park Land Company, LLC on July 20, 2006 which expires on June 10, 2011. At the time the site ceases to operate as a horse track and CAFO facility, a Notice of Termination (NOT) application must be submitted to the RWQCB to terminate the waste discharge NPDES general industrial and site specific permit requirements that apply exclusively to the site's current use.

## **ENVIRONMENTAL IMPACTS**

### **Methodology**

This section evaluates the potential impacts of the Proposed Project on water quality, waste discharge requirements, groundwater supplies, groundwater recharge, drainage patterns, flood hazard and flood water flows, and stormwater drainage systems.

To evaluate impacts of the Project on water quality, pollutants of concern are identified based on regulatory and other considerations. Potential changes in water quality are addressed for pollutants of concern based on runoff water quality modeling, literature information, and professional judgment. Impacts take into account Project Design Features (PDFs) selected consistent with the Los Angeles County Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (CAS004001), including the Los Angeles County Standard Urban Storm Water Management Plan (SUSMP) requirements. The level of significance of impacts is evaluated using a weight of evidence approach considering significance criteria that include predicted runoff quality for proposed versus existing conditions, MS4 Permit and General Construction Permit requirements, and reference to receiving water quality benchmarks, including Total Maximum Daily Load (TMDL) waste load allocations and water quality standards from the Water Quality Control Plan for the Los Angeles Region (Basin Plan) and California Toxics Rule (CTR).

### **Thresholds of Significance**

In accordance with Appendix G to the State CEQA Guidelines, a project would have a significant impact on the environment if it would:

- a) Violate any water quality standards or waste discharge requirements;
- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater

table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- e) Create or contribute runoff water that would exceed the capacity of existing planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- f) Otherwise substantially degrade water quality;
- g) Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- h) Place within a 100-year floor plain structures which would impede or redirect flood flows;
- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.

### **Impacts Determined to be Less Than Significant**

The Initial Study prepared for the Proposed Project determined that the Proposed Project would have no impact with respect to Threshold (i), listed above (see Appendix A). As such, no further analysis of this topic is required under CEQA.

### **Project Impacts**

#### *Pollutants of Concern*

The SUSMP requirements mandate that treatment controls address the pollutants of concern, which are defined in the SUSMP Manual as consisting of any pollutants that exhibit one or more of the following characteristics: current loadings or historic deposits of the pollutant are impacting the beneficial uses of a receiving water, elevated levels of the pollutant are found in sediments of a receiving water and/or have

the potential to bioaccumulate in organisms therein, or the detectable inputs of the pollutant are at concentrations or loads considered potentially toxic to humans and/or flora and fauna.

Pollutants of concern for the surface water quality analysis were identified for the Proposed Project based on the proposed land uses and water quality data collected from similar land uses, current 303(d) listings and TMDLs in the Dominguez Channel, as well as pollutants that have the potential to cause toxicity or bioaccumulate in the Proposed Project's receiving waters. Pollutants of concern for the groundwater quality analysis were identified for the Proposed Project based on water quality data from the same types of land uses, local hydrological characteristics, and chemical characteristics that include high mobility (low absorption potential), high solubility fractions, and abundance in stormwater. The Basin Plan contains numerical objectives for bacteria, mineral quality, nitrogen, and various toxic chemical compounds, and contains qualitative objectives for taste and odor. Based on these parameters, pollutants of concern for the Proposed Project include the following (see Appendix F-3 to this Draft EIR for a complete list of pollutants of concern, the basis for their selection, and the significance criteria that will be applied for each):

- sediments (total suspended solids (TSS) and turbidity);
- nutrients (phosphorus, nitrate-N, and ammonia-N);
- trace metals (copper, lead, and zinc);
- pathogens (bacteria, viruses, and protozoa);
- petroleum hydrocarbons (oil and grease and PAHs);
- pesticides;
- trash and debris;
- bioaccumulation; and
- methylene blue activated substances (MBAS) and surfactants.

The following surface and groundwater constituents are listed in the Basin Plan, but are not pollutants of concern for the Proposed Project: bacteria; algae, chemical oxygen demand (COD), and dissolved oxygen; mineral quality (TDS, sulfate, chloride, and boron); residual chlorine; color, taste, and odor; pH; chemical constituents and radioactivity; sulfides; toxic substances; and temperature. These constituents are not believed to be pollutants of concern for the Proposed Project based on the mean urban runoff concentrations for each of these constituents in Los Angeles County, which are well below the Basin Plan WQOs (see Appendix F-3 of this Draft EIR for further discussion).

### *Project Design Features*

The Proposed Project includes a number of Project Design Features (PDFs) intended to reduce or avoid water quality and hydrologic impacts. These PDFs include site design, source control, and treatment control Best Management Practices (BMPs) that will be incorporated into the Proposed Project and are thereby considered a part of the Proposed Project for purposes of impact analysis. Site design and source control BMPs help to manage the quantity and quality of both wet and dry weather runoff by limiting the frequency of occurrences and decreasing pollutant concentration. Treatment control BMPs are designed to remove pollutants once they have been mobilized by rainfall and runoff. The following is a brief discussion of the site design, source control, and treatment control PDFs for the Proposed Project.

#### *Site Design, Source Control, and Treatment Control BMPs*

As currently planned, stormwater runoff from all urban areas within the Project Site will be routed to structural treatment BMPs. Table IV.F-3 identifies each of these project drainage areas, the proposed treatment BMP's for each, and its location. The majority of the Project Site (64 percent) will be treated by the Arroyo and Lake Park stormwater treatment system. An additional 2 percent will be treated by a vegetated BMP system in Champion Park. The remaining areas (34 percent) will be treated by additional vegetated BMPs or catch basin inserts. At least 2,200 linear feet of swales or bioretention areas (i.e., vegetated BMPs) will be used in the mixed use area and high use parking lots to address trash and debris and petroleum hydrocarbons. Collectively, the water quality treatment control PDFs will treat the pollutants of concern in runoff from the 238-acre development. The proposed treatment control PDFs are described below and are illustrated in Figure IV.F-2, which shows the relative locations of the primary treatment control BMPs, Arroyo Park, Lake Park, and Champion Park. These treatment BMPs, when combined with the site design and source control BMPs described above, will address all of the pollutants of concern.

#### *Arroyo Park*

Arroyo Park will be a linear, landscaped PDF located within the median right-of-way of the Arroyo. A shallow, vegetated swale will be seamlessly integrated into the park and will be designed to capture all runoff generated from the approximately 71 acres of adjacent road surfaces and residential parcels. The park will be publicly accessible with street parking along its entire length, multiple access points, footbridges, and picnic areas. Curb cuts or other curb inlet designs along the Arroyo will convey runoff into the swale. Check dams and culverts with headwalls will control flow rates within the swale, which will ultimately discharge via a subsurface storm drain into the south part of the lake. See Figure IV.F-3 for conceptual landscape plans for Arroyo Park and the other treatment control BMPs.

**Table IV.F-3  
Project Drainage Areas and Treatment Control BMP's**

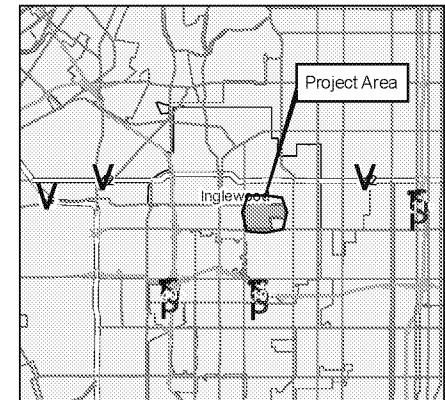
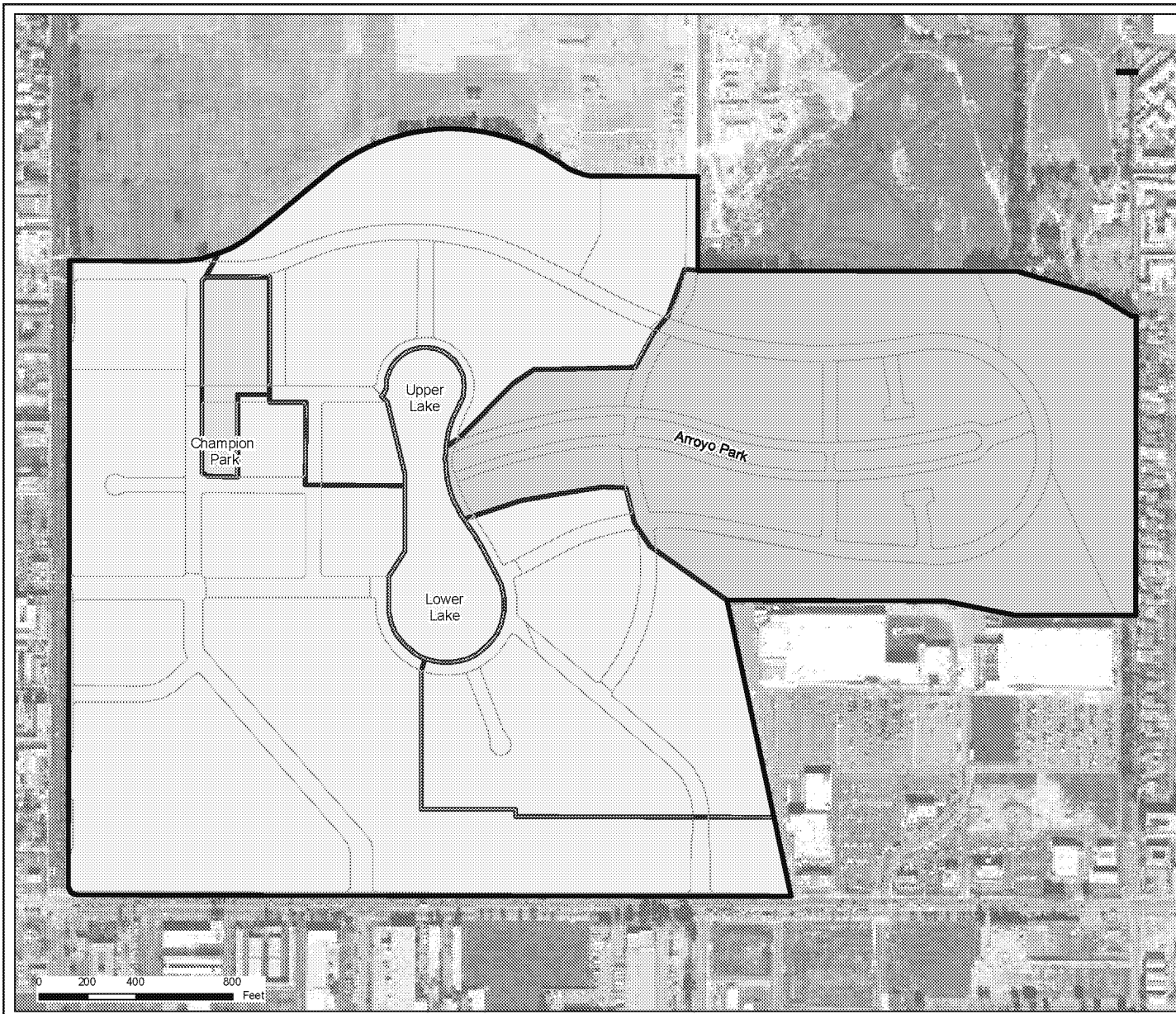
<b>Drainage Area</b>	<b>Area</b>	<b>Treatment BMP's and Location</b>
Arroyo	71.1	Vegetated swale within Arroyo Park
Lake	81.9	Stormwater lake within Lake Park
Champion Park	4.3	Vegetated BMP's within Champion Park
Retail/Commercial Center	81.1	Vegetated BMP's within high use parking lots and perimeter landscaped areas. Catch basin inserts for all areas not receiving vegetated treatment
<i>Source: Geosyntec Consultants, Hollywood Park Water Quality Technical Report, May 2008.</i>		

#### *Lake Park*

Lake Park will be a central attraction of Hollywood Park. The approximately nine-acre Lake Park includes an upper and lower lake, and will be landscaped with native and ornamental vegetation around the majority of its perimeter. The upper lake will be shallow and densely vegetated with emergent wetland plants, while the lower lake will be deeper, with a bulk head and some vegetation along its perimeter. A cascading waterfall will separate the upper and lower lakes and a continuously operated pump station will re-circulate water in the lake to ensure stagnation does not occur.

#### *Vegetated BMPs*

Vegetated BMPs include an array of BMP types that utilize several natural treatment processes such as vegetative filtration and uptake, infiltration, adsorption, and microbially-mediated transformations. Example of vegetated BMPs include grassed swales, filter strips and bioretention areas. These types of BMPs, when appropriately sized and designed, are effective at removing many pollutants of concern, including sediment and pollutants associated with sediment, as well as some dissolved constituents, such as dissolved copper and zinc. Vegetated BMPs are planned for Champion Park to treat runoff from adjacent residential areas. Swales, filter strips, and/or bioretention areas are planned within several high-use parking lots in the mixed-use area of the Proposed Project. See also Figure IV.F-4 for conceptual illustrations of the types of vegetated BMPs that will be implemented in the Proposed Project.



**Legend**

-  Project Boundary
-  Proposed Drainage Areas
-  Land Use Lot Lines
- Drains to:**
-  Arroyo Park
-  Champion Park
-  Lake Park
-  Mixed Use

DRAFT  
 Figure 5-1  
 Proposed Treatment Areas  
 Hollywood Park WQTR

May 2008

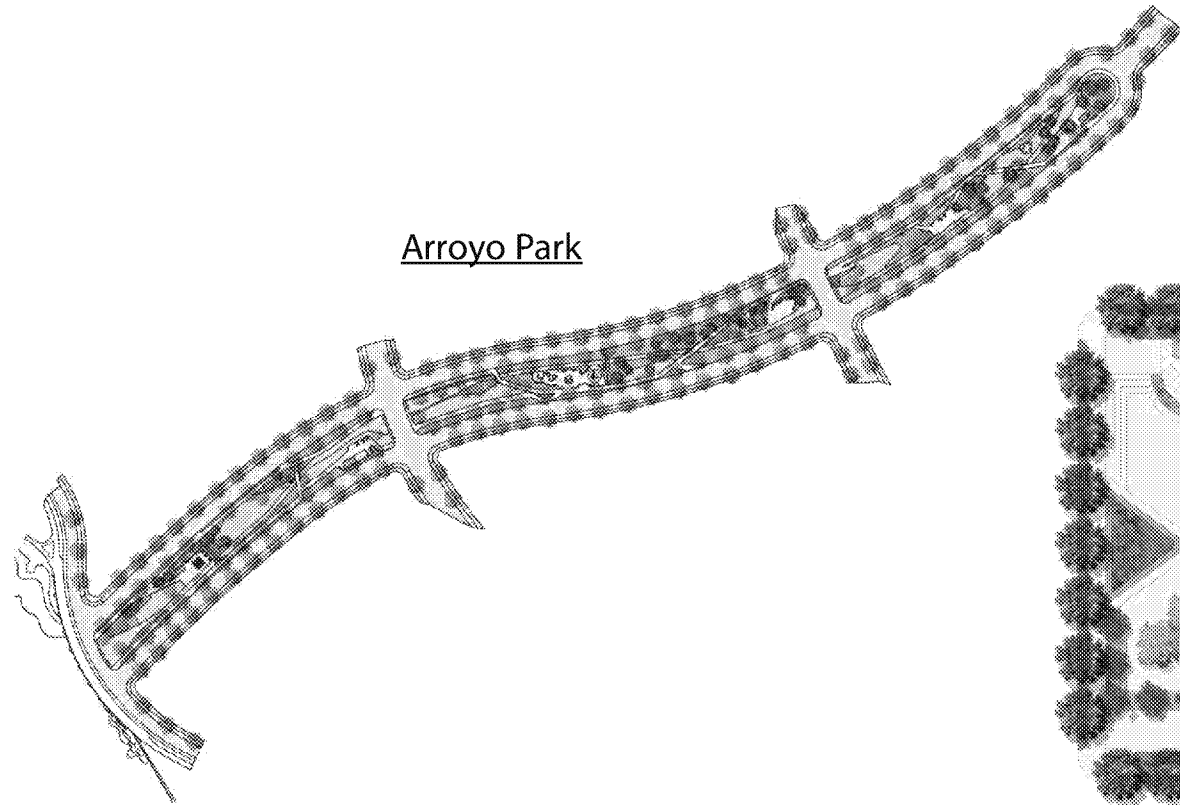


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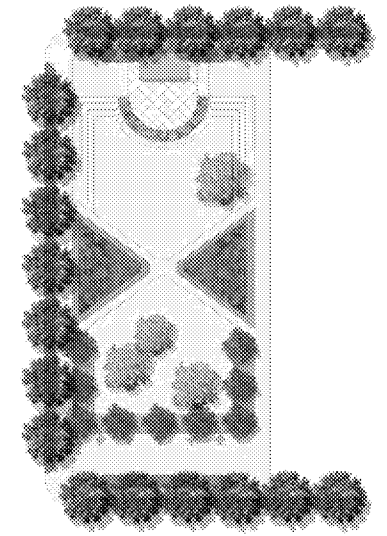
Source: Geosyntec Consultants, May 2008.



Lake Park



Arroyo Park



Champion Park

Source: Geosyntec Consultants and Mia Lehrer Associates, June 2007.

### *Catch Basin Inserts*

Catch basin inserts are stormwater screening and filtration devices that can be placed directly in conventional catch basins. There are several catch basin insert manufacturers and a variety of designs including those that can be placed in both curb inlet and drop inlet type catch basins. Most catch basin inserts utilize screens, filter fabrics, and absorptive media for capturing trash and debris, coarse particulates, and free-floating oil and grease. Catch basin inserts will be utilized in all areas in the mixed-use area that will not receive treatment via vegetated BMPs due to spatial constraints or other engineering factors. The ultimate selection of catch basin insert type is based on the tributary land activities, hydraulic loading rate, and catch basin design.

### *Volume-Based BMPs*

All volume-based treatment control BMPs for the Proposed Project will be sized to capture and treat at least 80 percent of the annual runoff volume from the tributary drainage area. The methodology utilizes historical rainfall data with continuous simulation modeling to calculate the treatment volume for each treatment control BMP. The size of the facilities will be finalized during the design stage by the Project engineer with the final hydrology study, which will be approved by the City of Inglewood prior to issuing the final grading permit(s).

### *Flow-Based BMPs*

Flow-based BMPs for the Proposed Project will be sized using a rainfall intensity of 0.2 inches per hour, which will result in treatment of the same portion of runoff (ie: at least 80%) as using volumetric standards described above. BMP sizing for the Proposed Project will be finalized during the design stage by the Project engineer with the final hydrology study, which will be approved by the City of Inglewood prior to issuing the final grading permit(s).

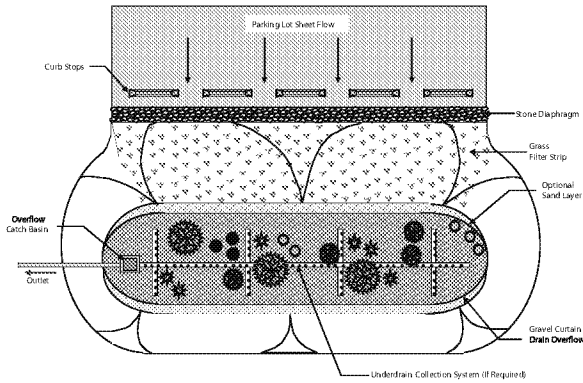
### *Pesticide Control*

The Proposed Project will include source control measures such as education programs for owners, occupants, and employees in the proper application, storage, and disposal of pesticides that will be used at the Project Site. For common area landscaping in commercial areas, multi-family residential areas, and parks, an Integrated Pest Management (IPM) Program will be incorporated. The goal of an IPM is to keep pest levels at or below threshold levels, reducing risk and damage from pest presence, while eliminating the risk from the pest control methods used. IPM programs achieve these goals through the use of low risk management options by emphasizing use of natural biological methods and the appropriate use of selective pesticides. IPM programs also incorporate environmental considerations by implementing procedures that minimize intrusion and alteration of biodiversity in ecosystems.

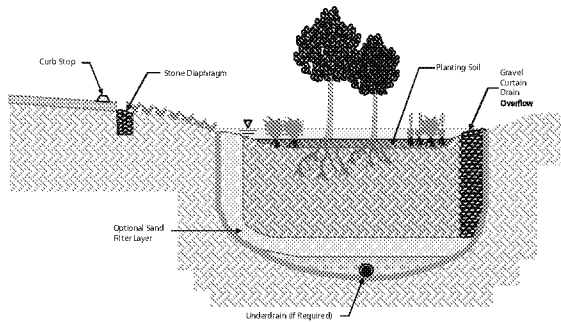


## Bioretention Areas

### Plan View

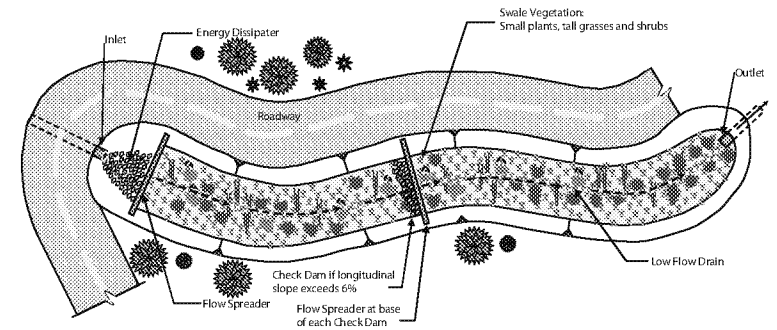


### Profile

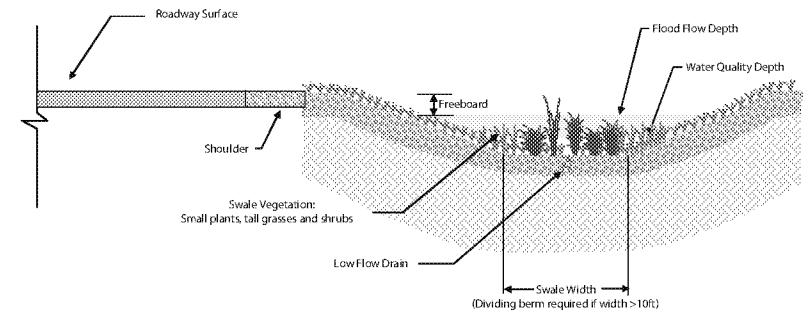


## Vegetated Swales

### Plan View



### Profile



Source: Geosyntec Consultants, June 2007.

### *Pathogen Control*

The most effective means of controlling pet wastes and wastes from human interaction with wildlife is through source control, specifically education of pet owners, education regarding feeding of waterfowl near waterbodies (e.g., Lake Park), providing products and disposal containers that encourage and facilitate cleaning up after pets, and storm drain cleaning practices. As such, these, and/or similar BMPs will be incorporated as part of the Proposed Project.

### *Trash and Debris*

Source controls such as street sweeping, public education, fines for littering, and storm drain stenciling can be effective in reducing the amount of trash and debris that is available for mobilization during wet and dry weather events. Common area litter control will include a litter patrol, covered trash receptacles, emptying of trash receptacles in a timely fashion, and noting trash violations by tenants/homeowners or businesses and reporting the violations to the owners/HOAs for investigation. Catch basin inserts will be provided for parking lots and other areas not receiving vegetated BMP treatment.

### *Dry Weather Runoff*

In order to minimize the potential generation and transport of dissolved constituents, native or drought-tolerant vegetation that requires little watering and chemical application will be planted in 50 percent or more of the public landscaped areas. Landscape watering in common areas, commercial areas, multiple family residential areas, and in parks will use efficient irrigation technology to minimize excess watering. In addition, educational programs and distribution of materials (source controls) will emphasize appropriate car washing locations (at commercial car washing facilities or the car wash pad in the multi-family residential areas) and techniques (minimizing usage of soap and water), encourage low impact landscaping and appropriate watering techniques, and discourage driveway and sidewalk washing. Illegal dumping will be discouraged by stenciling storm drain inlets and posting signs that illustrate the connection between the storm drain system and the receiving waters and natural systems downstream.

Vegetated BMPs and the lake will infiltrate and/or provide treatment for dry weather flows and small storm events. Water cleansing is a natural function of vegetation, offering a range of treatment mechanisms. Sedimentation of particulates is the major removal mechanism. However the performance is enhanced as plant materials allow pollutants to come in contact with vegetation and soils containing microbes that metabolize and transform pollutants, especially nutrients and trace metals. Plants also take up nutrients in their root system. Some pathogens would be removed through ultraviolet light degradation. Most oil and grease will be effectively adsorbed<sup>11</sup> by the vegetation and soil within the vegetated BMPs and the shallow, vegetated areas in the upper portion of the lake.

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<sup>11</sup> Adsorption is the accumulation of dissolved substances on the surface of solids.

### *Additional BMPs*

Appendix F-3 of this Draft EIR provides a complete matrix illustrating how the Project's proposed treatment control BMPs would implement each of the SUSMP requirements (i.e., control peak flows; conserve natural areas; minimize stormwater pollutants of concern; protect slopes and channels; provide storm drain system stenciling/signage; provide proof of ongoing maintenance; design standards for structural or treatment control BMPs; properly design outdoor material storage and trash storage areas, loading/unloading docks, repair maintenance bays, vehicle equipment wash areas, fueling areas, and parking areas; limit oil contamination and perform maintenance; and limit use of infiltration BMPs).

### *Hydrology/Drainage Flows*

Figure IV.F-1 identifies the existing off-site storm drain infrastructure, and the proposed points of connection to serve the Project Site. The Proposed Project would include construction of a new gravity storm drainage network on-site to collect stormwater flows. Storm drains will be sized with sufficient hydraulic capacity to accommodate the design hydrology. The minimum size of main line conduit routes shall be 18 or 24 inches for ease of maintenance, unless otherwise approved by the District / City. These will be installed under roadways within the public right of way or within easements for ease of maintenance. This new system will be maintained and operated by City of Inglewood Department of Public Works upon completion of construction.

### *Stormwater Runoff Volumes*

Table IV.F-4 shows the predicted changes in stormwater runoff mean annual volumes. Mean annual runoff volumes are generally expected to increase with development. The increase is largely a result of an overall increase in percent of impervious surface area at the Project Site. This is primarily due to the fact that runoff from 50 percent the existing area is currently almost completely retained on site (e.g., captured in the existing lakes and re-used for irrigation on site). For example, the effective imperviousness (i.e., the impervious area contributing runoff from the Project Site divided by the total area) of the existing Project Site is approximately 47 percent, while proposed imperviousness is approximately 73 percent. Runoff volume from an area is directly proportional to the area's percent imperviousness. As discussed previously, proposed PDFs include site design, source control, and treatment control BMPs in compliance with the SUSMP requirements.

### *Flooding*

The Project Site is within Flood Zone C of the FEMA map, which denotes areas subject to minimal flooding and determined to be outside the 500-year plain. As a result, the Proposed Project results in a less than significant impact with respect to placing housing within a 100-year flood plain.

**Table IV.F-4  
Predicted Average Annual Stormwater Runoff Volumes**

Site Conditions	Average Annual Stormwater Runoff Volume (acre-ft)
Existing	106
Proposed Project with PDFs	164
Change	+58 [55%]
<i>Source: Geosyntec Consultants, Hollywood Park Water Quality Technical Report, May 2008 (see Appendix F-3).</i>	

As shown in Table IV.F-4, the treatment control BMPs proposed for the Project Site would provide some runoff volume reduction. Compared to the Proposed Project without PDF's (73% imperviousness), the Proposed Project with PDF's yields a reduction in percent imperviousness (55%). Based on BMP monitoring data in the International Stormwater BMP Database, a 25 percent reduction in stormwater runoff volume was assumed to occur in the Arroyo Park swale and Champion Park. Additional volume reductions would likely occur within the lake due to evapotranspiration and within other vegetated BMPs, but these reductions were not explicitly accounted for in the model. Thus, predicted increases for the Proposed Project shown in Table IV.F-4, above, are conservative in that they assume higher numbers than those likely to result after implementation of all project BMPs.

As discussed above, the Proposed Project also includes an Arroyo Park and Lake Park within the public open space areas. Stormwater flows, where watershed topography allows, will be routed via these vegetated bio-filtration swales and wet ponds where they are incorporated into their respective areas. These non-structural BMP measures will reduce rates of runoff, attenuate flow, and improve the quality of stormwater leaving the site. For areas where it is not physically possible to route stormwater via the proposed Arroyo or Lake Park, the proposed on-site drainage system will take all reasonable measures to comply with the requirements of the SUSMP and use stormwater management methods to reduce rates of discharge from site and improve water quality levels using appropriate BMPs. For the proposed condition, the on-site storm drains will be designed to provide Urban Flood protection, a 25-year frequency design storm falling on a saturated watershed.

The proposed lake will be designed to have a static water level and will be sized to provide the necessary storage capacity. The static water level will be maintained with top-up water and collection of rainfall precipitation as required.

The lake will have a flood control volume above the static water level sufficient to detain the occurrence of a 50-year flood. In addition, a one-foot freeboard will be applied in excess of the flood control level to set adjacent building threshold levels. Under normal operating conditions the lake will outfall via a *weir*, a small overflow type dam, to control flows entering the on-site storm drainage system at allowable rates before discharging into the Los Angeles County storm drains located off-site. Any emergency overflow

from the lake will be routed along the proposed on-site streets to channel flows off-site towards Prairie Avenue should severe storm event occur (i.e. 100-year storm and above).

To help intercept waste, the storm drainage system will include trash collection technology such as catch-basin insert trash racks, along storm drainage routes that discharge into the lake. A lake recirculation system will be used to maintain and improve water quality within the lake waterbody and supply water for the proposed waterfall.

Where permitted by the Department of Fish and Game or any other applicable agency regulations, mosquito fish (*Gambusia affinis*) will be introduced into the pond to naturally control the population of mosquitoes and midges. If the fish are introduced, vegetation should be controlled, especially around the edges of the pond, to ensure that the fish have access to all areas.

As shown in Figure IV.F-1, the current redevelopment proposals will require the relocation and quit claim (termination of property rights) of the existing LACFCD Project 4401 (Line B), a 90-inch storm drain and associated easement that crosses the site. It is currently intended to relocate this route below the proposed public street network accordingly within the Proposed Project. This storm drain will still be operated and maintained by LACDPW.

The current development proposals will also require the relocation of the existing Hollywood Park (MTD 922) private storm drain that crosses the site. This will be used to route off-site flows separately from on-site flows across the site. The existing off-site points of connection will be retained and routed through the new relocated on-site MTD 922 route. The relocated MTD 922 piped route will not be connected to any of the proposed on-site drainage serving the site lots or routed via any of the on-site BMP systems. It is currently intended to relocate this route below the proposed public street network in the right of way and/or within easements within the Proposed Project accordingly. It is proposed that this storm drain will be operated and maintained by Los Angeles County in the future.

Based on preliminary post-development hydrology calculations the design runoff would be managed to not exceed the recommended and allowable runoff flows determined by LACDPW. The design runoff for Project 681 & 4402 is approximately 65.8 cfs, which is less than the LACDPW allowable rate of 72.1 cfs. The design runoff for Project 4401, Line A and DDI #8 is approximately 270 cfs, which would be reduced to an allowable runoff of 124.5 cfs by utilizing the Lake as a detention basin. These measures will ensure that Project 4401, Line A and DDI #8 do not exceed LACDPW's recommended allowable discharge of 286 cfs.

### ***Water Quality***

#### *Construction Impacts*

Three general sources of potential short-term construction-related stormwater pollution associated with construction projects are: 1) the handling, storage, and disposal of construction materials containing

pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via stormwater runoff or mechanical equipment and subsurface activities may also impact groundwater quality through the release of construction-related chemicals into the groundwater.

Stormwater discharges during construction activities can compromise the biological, chemical, and physical integrity of a receiving water body (e.g., the Pacific Ocean). The interconnected process of erosion, sediment transport, and delivery is the primary pathway for introducing key pollutants, such as nutrients (particularly phosphorus), metals, and organic compounds into aquatic systems. The potential impacts of construction activities, construction materials, and non-stormwater runoff on water quality focus primarily on sediment (TSS and turbidity) releases. Non-sediment related pollutants that are also of concern during construction include: construction waste materials; chemicals; liquid products; petroleum hydrocarbon products used in building construction or the maintenance of heavy equipment; and concrete-related waste streams. During construction, soil is generally exposed to natural processes such as precipitation (depending on the time of year) and runoff, which would all be contained on site.

Construction activities associated with the Hollywood Park redevelopment would be required to obtain an NPDES statewide General Construction Activity Permit. In addition, in compliance with the General Construction Permit and County of Los Angeles Standard Conditions, the Project Developer would file an NOI with the SWRCB and prepare an SWPPP prior to any construction activity. As part of the SWPPP, construction activities for the proposed development would be required to implement effective erosion and sediment control BMPs as well as BMPs that control other potential construction-related pollutants to minimize water pollution to the maximum extent practical, meeting or exceeding measures required by the General Construction Permit. Erosion control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. The General Permit requires the SWPPP to include a menu of BMPs to be selected and implemented based on the phase of construction and weather conditions to effectively control erosion and sediment to the Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology (BAT/BCT) standards.<sup>12</sup> Example BMPs to be included in this menu may include, but are not limited to: soil stabilization using rock or vegetation, re-vegetation, hydro-seeding or using tackifiers on exposed areas and stockpiles, installation of energy dissipaters, drop structures, catch basin inlet protection, construction materials management, and cover and containment of construction materials and wastes. This permit requires BMP selection, implementation, and maintenance during the construction phase of development. In addition, the final drainage plans would be required to provide structural or treatment control BMPs to mitigate (infiltrate or treat) stormwater runoff. Implementation of the BMPs in the project SWPPP and compliance with the County of Los Angeles' discharge requirements for water entering the County's storm drains would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments such as nutrients, heavy metals, and certain pesticides, including legacy

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<sup>12</sup> *Clean Water Act §304(b)(2)(B) and §304(b)(4)(B).*

pesticides, such that the project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. Specific construction-related PDFs and BMPs are discussed below.

#### *Dewatering*

Construction on the Project site may require dewatering and non-stormwater related discharges. For example, dewatering may be necessary for the construction of the lake features if groundwater is encountered during grading, or to allow discharges associated with testing of water lines, sprinkler systems and other facilities. In general, the General Construction Permit authorizes construction dewatering activities and other construction-related non-stormwater discharges as long as they (a) comply with Section A.9 of the General Permit; (b) do not cause or contribute to violation of any water quality standards, (c) do not violate any other provisions of the General Permit, (d) do not require a non-stormwater permit as issued by some RWQCBs, and (e) are not prohibited by a Basin Plan provision. Full compliance with applicable local, State and federal water quality standards by the Applicant would assure that potential impacts from dewatering discharges are less than significant.

An additional PDF will be implemented to protect receiving waters from dewatering and construction related non-stormwater discharges. Such discharges will be implemented in compliance with the LARWQCB's General Waste Discharge Requirements (WDRs) under Order No. R4-2003-0111, NPDES No. CAG994004 governing construction-related dewatering discharges within the Project Site. Typical BMPs for construction dewatering include infiltration of clean groundwater; on-site treatment using suitable treatment technologies; on- or off-site transport for sanitary sewer discharge with local sewer district approval; or use of a sedimentation bag for small volumes of localized dewatering. Compliance with this PDF would further assure that the impacts of these discharges are less than significant.

#### *Pesticides*

There are no known pesticide contaminated soils on-site. Nonetheless, disturbance and/or transport of potential pesticides adsorbed to existing site sediments may be a concern during the construction phase. The Construction SWPPP would contain sediment and erosion control BMPs pursuant to the General Construction Permit, and those BMPs would effectively control erosion and the discharge of sediment along with other pollutants per the BAT/BCT standards.

#### *Hydrocarbons*

During the construction phase of the Proposed Project, hydrocarbons in site runoff could result from construction equipment/vehicle fueling or spills. However, pursuant to the General Construction Permit, the Construction SWPPP must include BMPs that address proper handling of petroleum products on the construction site, such as proper petroleum product storage and spill response practices, and those BMPs must effectively prevent the release of hydrocarbons to runoff per the BAT/BCT standards. Polycyclic

Aromatic Hydrocarbon (PAH) that is adsorbed to sediment during the construction phase would be effectively controlled via the erosion and sediment control BMPs.

#### *Trash and Debris*

During the construction phase of the Proposed Project, there is potential for an increase in trash and debris loads due to lack of proper good housekeeping practices at the Project Site. Per the General Construction Permit, the SWPPP for the site will include BMPs for trash control (catch basin inserts, good housekeeping practices, etc.). Compliance with the Permit Requirements and inclusion of these BMPs, meeting BAT/BCT, in the SWPPP will mitigate impacts from trash and debris to a level less than significant.

#### *Turbidity*

With respect to turbidity, the Construction SWPPP must contain sediment and erosion control BMPs pursuant to the General Construction Permit, and those BMPs must effectively control erosion and discharge of sediment, along with other pollutants, per the BAT/BCT standards. Additionally, fertilizer control and non-visible pollutant monitoring and trash control BMPs in the SWPPP will combine to help control turbidity during construction. Proposed PDFs, including source controls (such as common area landscape management and common area litter control) and treatment control BMPs in compliance with the SUSMP requirements, to prevent or reduce the release of organic materials and nutrients (which might contribute to algal blooms) to receiving waters. Furthermore, as described above under “Modeled Pollutants of Concern,” nutrients in post-development runoff are not predicted to cause significant water quality impacts. Based upon the implementation of the proposed PDFs and construction-related controls described previously in this Section, runoff discharges from the Proposed Project would not cause increases in turbidity that could result in adverse affects to beneficial uses in the receiving waters and the water quality impacts related to turbidity during construction are considered less than significant. The Mitigation Measures identified herein will ensure that BMPs are implemented where appropriate and to reduce impacts related to polluted runoff during construction to less than significant levels.

#### *Operational Impacts*

Paved and developed areas contribute substantially greater quantities of water to the storm drain system than pervious landscaped areas. The quality of stormwater is generally affected by the length of time since the last rainfall, rainfall intensity, land use in the area, and quantity of transported sediment. Street and parking lot surfaces are the primary source of stormwater pollution in urban areas. Stormwater runoff from parking lots has the potential to contribute oil and grease, suspended solids, metals, gasoline, pesticides, and pathogens to the stormwater conveyance system. As such, new developments are required to be designed so as to reduce water pollution to the Maximum Extent Practicable (MEP).

The Project Site currently provides an expansive paved surface parking lot and several existing structures including the Hollywood Park Racetrack, Grandstand and Casino. Existing land uses both on and off site



suggest that unknown quantities of oil, grease, heavy metals, and dust/sediment are currently entering the system without any filtration during periods of moderate to heavy rainfall.

As such, a water quality model was used to estimate loads and concentrations for pollutants of concern under existing and post-construction conditions. The model, described in detail in Appendix F-3 to this Draft EIR, develops estimates of mean annual loads and concentrations based on the probability distribution of observed rainfall event depths, the probability distribution of event mean concentrations, and the probability distribution of the number of storm events per year. This model also takes into account the inclusion of certain structural treatment PDFs but does not take into account the source control PDFs (e.g., street sweeping) or certain treatment BMPs (e.g., vegetated BMPs in mixed use area or parking lot catch basin inserts) which would also improve water quality; thus the model provides conservative results that tend to overestimate pollutant loads and concentrations.

The following pollutants of concern for the Proposed Project were modeled using flow composite sampling data in the Los Angeles County database, which measures average water quality during a storm event in relation to: TSS (sediment); total phosphorus (TP); nitrate-nitrogen, nitrite-nitrogen, ammonia, and total nitrogen (TN); and dissolved copper, total lead, and dissolved zinc. Table IV.F-5 shows the existing and predicted average annual concentration and loads for the modeled pollutants of concern.

**Table IV.F-5**  
**Predicted Average Annual Concentrations and Load for Modeled Pollutants of Concern**

<b>Pollutant of Concern</b>	<b>Site Conditions</b>	<b>Average Annual Concentrations</b>	<b>Average Annual Load</b>
Total Suspended Solids (TSS)	Existing	53 mg/L	7.6 tons/year
	Proposed Project with PDFs	35 mg/L	7.7 tons/year
	<i>Change</i>	<i>-18 mg/L</i>	<i>+0.1 tons/year</i>
Total Phosphorous (TP)	Existing	0.31 mg/L	88.2 lbs/year
	Proposed Project with PDFs	0.21 mg/L	95.3 lbs/year
	<i>Change</i>	<i>-0.10 mg/L</i>	<i>+7.1 lbs/year</i>
Nitrate+Nitrite-Nitrogen	Existing	0.52 mg/L	149 lbs/year
	Proposed Project with PDFs	0.59 mg/L	263 lbs/year
	<i>Change</i>	<i>+0.07 mg/L</i>	<i>+114 lbs/year</i>
Ammonia-Nitrogen	Existing	0.76 mg/L	218 lbs/year
	Proposed Project with PDFs	0.37 mg/L	163 lbs/year
	<i>Change</i>	<i>-0.39 mg/L</i>	<i>-55 lbs/year</i>
Dissolved Copper	Existing	10 (µg/L)	2.8 lbs/year
	Proposed Project with PDFs	8 (µg/L)	3.5 lbs/year
	<i>Change</i>	<i>-2 (µg/L)</i>	<i>-0.7 lbs/year</i>
Total Lead	Existing	8 (µg/L)	2.3 lbs/year
	Proposed Project with PDFs	5 (µg/L)	2.1 lbs/year
	<i>Change</i>	<i>-3 (µg/L)</i>	<i>-0.2 lbs/year</i>
Dissolved Zinc	Existing	128 (µg/L)	37 lbs/year
	Proposed Project with PDFs	64 (µg/L)	28 lbs/year
	<i>Change</i>	<i>-64 (µg/L)</i>	<i>-9 lbs/year</i>
<i>Source: Geosyntec Consultants, Hollywood Park Water Quality Technical Report, May 2008 (see Appendix F).</i>			

Table IV.F-6 compares the predicted average annual concentrations of each of the pollutants of concern in stormwater runoff from the Project Site to Basin Plan WQOs and benchmarks, CTR criteria, and concentrations observed in the Dominguez Channel, where applicable.

**Table IV.F-6  
Comparison of Predicted Concentrations with Water Quality Criteria  
and Concentrations Observed in Dominguez Channel**

<b>Pollutant of Concern</b>	<b>Predicted Average Annual Concentration (mg/L)</b>	<b>Basin Plan WQOs<sup>a</sup></b>	<b>CTR Acute Criteria<sup>b</sup></b>	<b>Observed Average Annual Concentrations in Dominguez Channel<sup>c</sup></b>
Total Suspended Solids (TSS)	35	Water shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial uses	NA	70 - 269 mg/L
Total Phosphorous (TP)	0.21	Water shall not contain biostimulatory substances in concentrations that promote aquatic growth to the extent that such growth causes nuisance or adversely affects beneficial uses.	NA	0.18 - 0.34 mg/L
Nitrate+Nitrite-Nitrogen	0.59	10 mg/L	NA	0.62 - 1.31 mg/L
Ammonia-Nitrogen	0.37	1.0 mg/L	NA	0.27 - 0.88 mg/L
Dissolved Copper	8 µg/L	Waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life.	12 µg/L	9.6 - 17.6 µg/L
Total Lead	5 µg/L		55 µg/L	2.5 - 12.2 µg/L
Dissolved Zinc	64 µg/L		103 µg/L	61.1 - 109 µg/L

<sup>a</sup> Basin Plan WQO for ammonia-N is pH and temperature dependent. A pH of 7, based on Dominguez Channel monitoring data, and temperature of 30°C were conservatively assumed.

<sup>b</sup> Hardness = 86 mg/L, based on average annual median observed value by LACDPW at the Dominguez Channel mass emissions station for the monitoring years 2001-2006. Lead criterion is for total recoverable lead.

<sup>c</sup> Range of average annual concentrations observed by LACDPW at the Dominguez Channel mass emissions station for the monitoring years 2001-2006.

Source: Geosyntec Consultants, Hollywood Park Water Quality Technical Report, May 2008 (see Appendix F-3).

The other pollutants of concern, such as pesticides, pathogens, hydrocarbons, and trash and debris are not amenable to this type of sampling either because of short holding times (e.g., pathogens), difficulties in obtaining a representative sample (e.g., hydrocarbons; trash and debris), or low detection levels (e.g., pesticides, dissolved lead). Therefore, the following pollutants were addressed qualitatively using a literature review, knowledge of unit processes expected in BMPs, and best professional judgment: turbidity; pesticides; pathogens (bacteria, viruses, and protozoa); hydrocarbons (oil and grease, PAH);

trash and debris; and MBAS.

#### *Modeled Pollutants of Concern*

*Total Suspended Solids (TSS).* As is demonstrated in Table IV.F-5, while the conversion from a horse racing facility with substantial areas of exposed soils to the proposed urban land uses would be expected to significantly reduce sediment loadings, the lack of existing runoff from the currently exposed soil areas results in only a small estimated reduction in the average TSS concentration and a slight increase in average annual TSS loads from the Project Site after treatment.

As is shown in Table IV.F-6, the predicted TSS concentration is well below the average values observed in Dominguez Channel. Based on the comprehensive site design, source control, and treatment control strategy, and the comparison with available instream data and Basin Plan benchmark objectives, the TSS in stormwater runoff from the Proposed Project will not adversely affect beneficial uses in the receiving waters.

Based on the comprehensive site design, source control, and treatment control strategy and the comparison with available instream monitoring data and Basin Plan benchmark objectives, potential impacts associated with TSS are considered less than significant.

*Total Phosphorous (TP).* As is demonstrated in Table IV.F-5, TP load is predicted to increase slightly and TP concentration is predicted to decrease slightly post-construction compared to existing conditions. While existing TP loadings may be expected to be higher due to the current horse racing and stabling activities, the minimal discharge of runoff that currently occurs from the Project Site results in only a small change in predicted loadings for the Proposed Project with the incorporation of treatment PDFs.

There are no numeric objectives for TP in the Basin Plan. The low predicted TP concentrations in Project-related stormwater discharges will not promote (i.e., increase) algae growth and therefore will comply with the narrative objective for biostimulatory substances in the Basin Plan presented in Table IV.F-6. As shown in Table IV.F-6, the predicted TP concentration is at the low-end range of observed concentrations in the Dominguez Channel.

Based on the comprehensive site design, source control, and treatment control strategy and the comparison with available instream monitoring data and Basin Plan benchmark objectives, potential impacts associated with TP are considered less than significant.

*Nitrogen Compounds.* As is demonstrated in Table IV.F-5, average concentrations of nitrate-nitrogen plus nitrite-nitrogen are predicted to slightly increase as loads are predicted to increase by approximately 77 percent. Since only a slight increase in average concentrations are predicted, the increase of nitrate-nitrogen plus nitrite-nitrogen load is primarily attributed to the estimated increase in annual average runoff volume. Both ammonia-nitrogen concentrations and loads are predicted to decrease, which is

attributed to the treatment provided by the proposed PDFs.

As shown in Table IV.F-6, average annual stormwater concentration of ammonia is predicted to be considerably less than the Basin Plan objective, and within the low-end range of observed concentrations in Dominguez Channel. Likewise, the average annual stormwater concentration of nitrate-N plus nitrite-N is predicted to be considerably less than the Basin Plan WQO and below the range of observed concentrations for Dominguez Channel.

While nitrate-N plus nitrite-N load is predicted to increase with the Proposed Project, due to the substantial estimated load reduction in ammonia-N (a 303d-listed pollutant) along with concentration reductions in all modeled nitrogen species with values below numeric benchmarks, the Proposed Project's impacts associated with nitrogen compounds are considered less than significant.

*Metals.* Copper, lead, and zinc are the most prevalent metals typically found in urban runoff. Other trace metals, such as cadmium, chromium, and mercury, are typically not detected in urban runoff or are detected at very low levels.<sup>13</sup> As demonstrated in Table IV.F-6, although runoff volume will increase with the Proposed Project, the change in land use with the planned level of treatment is predicted to decrease the runoff concentration of all three trace metals. While the annual load of dissolved copper is predicted to slightly increase because of the increase in runoff volume, lead and zinc loads are predicted to decrease from existing conditions.

Proposed PDFs include site design, source control, and treatment control BMPs in compliance with the SUSMP requirements. The natural treatment processes provided by the Arroyo Park and Lake Park, as well as the vegetated BMPs planned for Champion Park and dispersed throughout parking lots in the mixed-use area will provide additional treatment of trace metals not specifically accounted for in the model. Furthermore, the selection of building material for roof gutters and downspouts that do not include copper or zinc will help minimize increases in trace metals. Other source control PDFs that target metals include education of property owners, BMP maintenance, and street sweeping of private streets and parking lots. Only the effects of the treatment control PDFs are reflected in the model results.

The California Toxics Rule (CTR) criteria are the applicable WQOs for protection of aquatic life and human health. The CTR criteria are expressed for acute and chronic (four-day average) conditions; however, only acute conditions were considered to be applicable for stormwater discharges because the duration of stormwater discharge at the Project Site is consistently less than four days. The CTR criteria are calculated on the basis of the hardness of the receiving waters. Lower hardness concentrations result in lower, more stringent CTR criteria. An average hardness value of 86 mg/L as CaCO<sub>3</sub> observed in the Dominguez Channel at the Los Angeles County mass emissions station was used to estimate the acute CTR benchmarks for trace metals. The comparison of the Proposed Project to the benchmark CTR values

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<sup>13</sup> Los Angeles County Department of Public Works, 2005 (see Appendix F-3 to this Draft EIR).

presented in Table IV.F-6 shows that all of the trace metal concentrations are well below the criteria. In addition, predicted trace metal concentrations are less than or at the low end of the range of observed average concentrations for copper, lead, and zinc at the LACDPW monitoring station downstream of the Project Site.

Based on the comprehensive site design, source control, and treatment strategy and the comparison with the instream water quality monitoring data and benchmark CTR values, the Proposed Project's potential impacts associated with trace metals are considered less than significant.

#### *Non-Modeled Pollutants of Concern*

*Turbidity.* Turbidity is a measure of suspended matter that interferes with the passage of light through the water or in which visual depth is restricted.<sup>14</sup> Discharges of turbid runoff are primarily of concern during the construction phase of development, discussed previously in this Section. As described therein, based upon the implementation of the proposed PDFs and construction-related controls described previously in this Section, runoff discharges from the Proposed Project would not cause increases in turbidity that could result in adverse affects to beneficial uses in the receiving waters and the water quality impacts related to turbidity are considered less than significant.

*Pesticides.* Pesticides would be applied to common landscaped areas and residential lawns and gardens during operation of the Proposed Project. Diazinon and chlorpyrifos are two pesticides commonly found in urban streams and that are of concern due to their potential toxicity to receiving waters. The U.S. EPA banned all indoor uses of diazinon in 2002 and stopped sales for all outdoor non-agricultural use in 2003.<sup>15</sup> The U.S. EPA is also phasing out all indoor and outdoor residential uses of chlorpyrifos and has stopped all non-residential uses where children may be exposed. Use of chlorpyrifos in the Proposed Project is not expected, with the possible exception of emergency fire ant eradications, until such time as reasonable alternative products are available and only with appropriate application practices in accordance with the landscape pesticide management program. As discussed previously in this Section, the Proposed Project will include a number of PDFs, including an education program for owners, occupants, and employees, as well as an Integrated Pest Management (IPM) program. As part of the IPM program, careful consideration will be made as to the appropriate type of pesticides for use on the Project Site. While pesticide use is likely to occur due to maintenance of landscaped areas, particularly in the residential portions of the development, careful selection, storage and application of these chemicals for use in common areas per the IPM Program following LAUSD standards will help prevent adverse water quality impacts from occurring. Additionally, removal of sediments as part of the proposed PDFs will remove sediment-adsorbed pesticides. Based on the incorporation of site design, source control, and

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<sup>14</sup> Sawyer et al, 1994 (see Appendix F-3 to this Draft EIR).

<sup>15</sup> U.S. Environmental Protection Agency, 2002.

treatment control BMPs pursuant to SUSMP requirements and the use of an IPM program, potential operational Project impacts associated with pesticides are considered less than significant.

*Pathogens.* Natural levels of bacteria are present in the Project Site's receiving waters and control of such natural sources is not required nor desired by regulatory agencies. The primary sources of fecal coliform from the Proposed Project would likely be sediment, pet wastes, wildlife, and regrowth in the storm drain itself. Other sources of pathogens and pathogen indicators, such as cross connections between sanitary and storm sewers, are unlikely given modern sanitary sewer installation methods and inspection and maintenance practices. A number of existing studies conducted for pathogens in receiving waters in urban areas (such as the Proposed Project) support the conclusion that the development of the Proposed Project would not result in appreciable changes in pathogen levels in receiving waters compared to existing conditions (see Appendix F-3 to this Draft EIR). As discussed previously in this Section, the Proposed Project will include a number of source controls, and treatment control PDFs, including an education programs for owners, occupants, and employees, aimed to reduce the amount of pet waste entering receiving waters. With the incorporation of proposed PDFs, the Proposed Project would not result in appreciable changes in pathogen levels to receiving waters compared to existing conditions, and potential water quality impacts related to pathogens are considered less than significant.

*Hydrocarbons.* Although the concentration of hydrocarbons in runoff is expected to increase slightly with the completion of the Proposed Project due to the increase in roadways, driveways, parking areas, and vehicle use, the proposed PDFs are expected to prevent appreciable increases in hydrocarbon concentrations from leaving the Project Site. Source control PDFs that address petroleum hydrocarbons include educational materials on used oil programs, carpooling, and public transportation alternatives to driving; BMP maintenance; and street sweeping private streets. It is anticipated that vehicles associated with the Proposed Project will, in general, be well-maintained and will include newer models which will help to limit emissions and leaks. Lastly, the proposed parking lot site design, source controls, treatment BMPs, and vegetation and soils within the treatment control PDFs will adsorb the low levels of emulsified oils in stormwater runoff, preventing discharge of hydrocarbons and visible film in the discharge or the coating of objects in the receiving water. Overall, the Proposed Project's effect on petroleum hydrocarbon levels in the receiving waters is considered less than significant.

*Trash and debris.* Urbanization can significantly increase trash and debris loads, which imposes an oxygen demand on a water body as organic matter decomposes. However, the proposed PDFs, that include both source control and treatment BMPs, will remove or prevent the release of floating materials, including solids, liquids, foam, or scum, from runoff discharges and will therefore mitigate impacts on dissolved oxygen in the receiving water. For these reasons, water quality impacts related to trash and debris are considered less than significant.

*Methylene Blue Activated Substances (MBAS).* MBAS, which is related to the presence of detergents in runoff, may be incidentally associated with urban development due to commercial and/or residential vehicle washing or other outdoor washing activities. Surfactants, wetting agents which allow for easier

spreading, disturb the surface tension which affects insects and the function of gills in aquatic life. The Proposed Project will control the presence of soap by implementing source control PDFs, including a public education program on residential and charity car washing, and the provision of a car wash pad connected to sanitary sewer in the multi-family residential areas. Other sources of MBAS, such as cross connections between sanitary and storm sewers, are unlikely given modern sanitary sewer installation methods and inspection and maintenance practices. For these reasons, potential water quality impacts related to MBAS are considered less than significant.

#### *Bioaccumulation*

The potential for bioaccumulation impacts from the lake and proposed vegetated BMPs will be minimal because the Project Site is largely impervious with very little coarse solids. The vegetation in the proposed facilities will trap sediments and pollutants in the soils, which contain bacteria that metabolize and transform trace metals, thereby reducing the potential for these pollutants to enter the food chain. While the lake may attract water fowl and other wildlife, runoff will be treated in the Arroyo swale prior to discharge to the lake, reducing concentrations of potentially bioaccumulative compounds. The recirculation of lake water and the use of aerators will ensure the water column stays oxygenated and that any volatile compounds are released to the atmosphere. Furthermore, the Proposed Project would not introduce any of the primary pollutants of concern with regard to bioaccumulation, which include mercury, selenium, and legacy pesticides, such as DDT. Therefore, the potential for bioaccumulation and adverse effects on waterfowl and other species is considered less than significant.

#### *Dry Weather Runoff*

While there are no specific requirements in the MS4 Permit and the SUSMP requirements to treat dry-weather discharges from the Project Site, pollutants during dry weather flow could also be of concern because these conditions occur throughout a large majority of the year. Dry weather flow is typically low in sediment because the flow is relatively low, and therefore, coarse suspended sediment tends to settle out or is filtered out by vegetation. As a consequence, pollutants that tend to be associated with suspended solids (e.g., phosphorus, some bacteria, some trace metals, and some pesticides) are typically found in very low concentrations during dry weather flow. Nonetheless, the Proposed Project will be a new development with new storm drains and sanitary sewer systems, which are expected to have minimal, if any, leakage. Assuming that control PDFs will reduce the volume of dry weather runoff, and treatment control PDFs will capture and treat the majority of the dry weather runoff that may occur (see discussion of PDFs previously in this Section), the potential impact from dry weather flows is considered less than significant.

#### *Direct Groundwater Quality Impacts*

The Project's impact on groundwater will occur through general infiltration of irrigation water and through incidental infiltration of urban runoff through the proposed treatment control PDFs (e.g. Arroyo

swale and other vegetated BMPs). Since the historical shallow groundwater level at the site is deeper than 50 feet (Group Delta, 2007) impacts to groundwater caused by infiltration of irrigation water and treated urban runoff is considered less than significant. Groundwater quality will be fully protected through implementation of the Project's site design, source control, and treatment control PDFs prior to reaching groundwater. With respect to groundwater, the pollutant of concern is nitrate-N plus nitrite-N. The Basin Plan groundwater quality objective for nitrate-nitrogen plus nitrite-nitrogen is 10 mg/L (which is more stringent than the objective for nitrate-nitrogen alone (10 mg/L) plus nitrite-nitrogen alone (1 mg/L)). The predicted nitrate-nitrogen plus nitrite-nitrogen concentration in runoff after treatment in the Project PDFs is 0.6 mg/L, which is well below the groundwater quality objective. The typical irrigation water supply nitrate-nitrogen concentration is 0.63 mg/L, which is also well below the groundwater quality objective. On this basis, and the fact that the groundwater table is greater than 50 feet below ground, the potential to adversely affect groundwater quality is considered less than significant.

### *Water Quality Impacts and Safety Concerns from the Hollywood Park Lake*

There are several potential public health concerns associated with manmade lakes and water features, and the lake at Hollywood Park is designed to alleviate each. The discussion below describes the various public health concerns that may be associated with a manmade lake and the design features that alleviate each concern. The lake at Hollywood Park will be designed to be a safe, attractive amenity for the neighborhood with specialized design features to maintain the quality of the lake. The lake at Hollywood Park will be designed to maintain excellent water quality at all times and to provide excellent treatment for stormwater that will pass through the lake for treatment.

### *Mosquitoes in Manmade Lakes and Water Features*

The Hollywood Park lake will be constructed with several design features specifically designed to limit the available habitat for mosquito breeding. Mosquito production is a concern for any body of water, especially in Southern California where warm weather permits year-round mosquito breeding if water conditions are favorable. There are many species of mosquito in California, but typically only a few create most of the problems in developed areas. These problem mosquitoes breed in stagnant, polluted waters which lack fish or other predators that prey on the defenseless aquatic mosquito larvae. Typical mosquito breeding locations include small pools of water in tires, unmaintained bird baths, trash such as paper cups or cans, or areas where leaking or poorly adjusted irrigation systems create persistent pools of water. Large, clean bodies of water such as well maintained lakes do not typically support significant mosquito populations. The lake at Hollywood Park will be constructed with hardened edges, deeper water in emergent wetlands, and water quality systems, all of which eliminate mosquito breeding habitat. The edges of the lake will consist of different engineered concrete shorelines and bulkheads. Some of these shorelines will be constructed with roughened surfaces and include natural rock to mimic the appearance of a natural shoreline. In contrast to many natural shorelines, however, the hardened shoreline will provide little extremely shallow water less than a few inches deep that could allow mosquito larvae to survive while excluding fish and other larval predators. Similarly, emergent wetlands within the lake will



be designed with a minimum of approximately 6 inches of water. This will allow fish and other predators of mosquito larva access to the wetlands where they will effectively eliminate mosquito larvae. Another feature of the lake that will minimize mosquito production is the excellent water quality. Clean water not only supports fish and other predators but also renders the lake unattractive to many of the most troublesome species of mosquitoes. Finally, the large open water surface of the lake will result in ripples and waves that will make survival difficult for mosquito larvae. Overall the lake will provide very little suitable habitat for mosquito larvae and will support healthy populations of mosquito predators, and very few mosquitoes will successfully breed in the lake.

#### *Other Vectors and Nuisance Animals*

In addition to mosquitoes, several other types of potential disease vectors are often associated with lakes, although this association is not typically rooted in fact. Rats may be associated with water bodies because they are commonly found at wharfs and harbors, and are associated with storm sewers, which can be used to carry stormwater to manmade lakes. However, properly designed and constructed manmade lakes (and natural lakes as well) provide very little suitable habitat for Norway or Black Rats, the species of rats that cause problems for humans. Norway Rats typically live in or near buildings, pipes, barns, or other manmade structures, and are unlikely to inhabit the edges of a lake. Black Rats, or Roof Rats as they are also called, are more arboreal than Norway Rats, and commonly live on vine-covered fences and dense ornamental vegetation, as well as occasionally living in dense riparian vegetation along lakes or streams. Although Black Rats can live near lakes, especially lakes with dense ornamental vegetation, they can also live throughout landscaped residential areas, and the lake should not be considered as an attractor of rats, but rather as another potential, but not necessarily preferred, habitat for a very widespread pest.

Muskrats are semi-aquatic native rodents that may be attracted to manmade lakes, but should not be confused with Norway or Black Rats. Muskrats are wild animals, in the same category as rabbits, squirrels, or other small mammals that inhabit natural areas and suitable manmade environments. Muskrats can be a nuisance to lake owners, but do not transmit diseases, damage crops, or infest buildings the way Norway or Black Rats may. Muskrats are not found everywhere in California and may not be present in the vicinity of this project.

In the same way that mosquitoes spend part of their lives in and out of aquatic environments, other insects have a similar life history and can inhabit manmade ponds or water features. Some of these insects can occur in numbers that can create a nuisance; however, none of them bites humans, transmits disease, or is attracted to humans the way mosquitoes are.

Midges are small flying insects that begin life in the waters and sediments of ponds, lakes and rivers. Upon reaching adulthood, midges emerge from the water and embark on courtship flights, typically over or near the water in which they were born. These courtship flights take the form of groups of midges flying in masses that hover in a location and often occur near dusk. These flights generally happen near the water, and in some cases occur over trails frequented by people. These masses of midges are not

attracted to people, but when a person happens to walk into the mass of midges it is easy to mistake the courtship flight for an organized attack; a midge looks very much like a mosquito. It should be noted that reports of thick swarms of mosquitoes are often due to flights of midges.

Midges occur in clean waters, and abundant midges are an indication of a healthy lake. Although midges represent an important part of the aquatic food chain, in many cases predators do not easily control their numbers, and chemical control of midges with pesticides is generally not feasible or desirable, making the control of midges difficult. Midges are attracted to lights, so careful design of lighting near the lake may offer the best solution for controlling the interaction between people and midges.

Crane flies are large relatives of mosquitoes that, like their biting cousins, start life in water. Crane flies rarely occur in large numbers like midges, but due to their large size may be more easily noticed by community residents. Crane flies do not bite and are a harmless part of the aquatic ecosystem.

#### *Shoreline Safety*

The safety of the public is a primary concern of lake designers, and the lake at Hollywood Park will be designed to provide a safe shoreline environment. The shoreline will be constructed with a maximum water depth of 18 inches at the edge, bordered by a gently sloping submerged concrete shelf that extends to a depth of approximately 4 feet creating a "safety ledge." The shallow edge allows anyone who might accidentally fall into the lake to easily exit the lake. The engineered shoreline for this project will generally consist of two types, either a vertical concrete bulkhead or an eroded concrete sloping shoreline. The primary function of an engineered shoreline is to prevent erosion from wind waves. The eroded concrete shoreline will have a slope at the immediate water edge and will be no steeper than 1:1 and the roughened concrete and rock provide secure footing for anyone who needs to get out of the lake. The engineered shoreline will extend above the normal operating level of the lake an addition 24" to 30" in order to provide sufficient freeboard for surcharge storage of stormwater within the lake. Beyond the immediate face of the submerged shoreline, a submerged concrete safety ledge (roughened to resemble soil or rock) will gradually lead to deeper water. This gentle slope of approximately 4:1 (horizontal:vertical) is steep enough that anyone wading into the lake will be aware that the water is getting deeper toward the middle, but flat enough that the wader can easily retreat from the lake. Beyond the four foot depth a liner system on the bottom over the soil will extend at a slope that may be up to a maximum 3.5:1 (H:V), but 4:1 preferred. The overall effect of the safety edge is to provide a situation in which nobody can accidentally find themselves in deep water. There are no specific safety regulations or public health/building codes, which require fencing of open water bodies. Fencing is required by California Health and Safety Codes for swimming pools which are defined as water bodies with surface area less than 20,000 square feet. The lake has a surface area that exceeds this definition so fencing is not required. Safety liability is limited to duty of care through posting warning signs.

### *Fecal Coliform Bacteria*

Fecal coliform bacteria are a class of bacteria present in human intestines and ubiquitous in municipal wastewater and stormwater runoff. Fecal coliforms are not themselves harmful, but rather are used as indicator bacteria – the presence of fecal coliforms indicates that human waste might have entered the water and other dangerous bacteria and viruses may, like the fecal coliform, have survived in substantial numbers. In most cases the dangerous disease-causing microbes are more difficult to detect in water, and therefore tests to identify fecal coliform are used instead to indicate the potential presence of dangerous microbes.

Fecal coliforms are typically present in all southern California streams, whether the streams drain developed or undisturbed watersheds. Fecal coliforms and other bacteria are living organisms that behave differently than other pollutants. Fecal coliforms may die in lakes as a result of ultraviolet light exposure, lack of sufficient nutrients or other required constituents, or other mechanisms. In some cases fecal coliforms can grow in water, particularly in nutrient-rich water such as can be found in storm drains or polluted lakes or streams.

A lake has many potential sources of fecal coliform bacteria, including storm drains, runoff directly into the lake, and wildlife that will be attracted to the lake. All lakes, including manmade lakes, attract waterfowl that deposit bacteria including fecal coliform bacteria into the lake. However, birds and wildlife do not generally produce human pathogens, and of course, their droppings do not indicate the presence of untreated sewage. Therefore fecal coliforms are not a perfect indicator of pathogens in a lake. The bacteria loads from waterfowl are readily treated by the in-lake water quality systems that will be present at Hollywood Park. Bridgeport Lake in Valencia, California, a manmade lake very similar to Hollywood Park Lake has large numbers of waterfowl all year long, yet the water is typically very low in fecal coliforms, as indicated in Appendix F-4 to this Draft EIR. Thus, the lake at Hollywood Park is expected to have similar low levels of bacteria despite the inevitable presence of waterfowl, other wildlife, and pets that are attracted to a manmade lake.

The lake will serve as an efficient BMP for removing fecal coliform and other bacteria from stormwater, and the lake will not serve as a significant source of indicator bacteria or pathogens to the receiving water. Because of the water quality systems in the lake and many natural processes that remove bacteria from surface waters, the lake will exhibit consistently low concentrations of fecal coliforms, as indicated by monitoring data from Bridgeport Lake. As indicated in Appendix F-4 to this Draft EIR, the lake will have fecal coliform levels at least ten orders of magnitude lower than the levels in typical stormwater runoff monitored by Los Angeles County. Due to dilution and various physical, chemical, and biological processes, the proposed lake will significantly reduce the concentration of fecal coliform compared to typical urban runoff, resulting in runoff that is very low in fecal coliform compared to typical urban runoff treated in standard BMPs. Thus the lake will significantly reduce the discharge of bacteria and pathogens from the site as compared to typical urban developments.

### *Pathogenic Organisms*

Pathogenic organisms will be present in very low concentrations in the lake at Hollywood Park as indicated by the low levels of fecal coliform bacteria present in lakes of similar construction. Various types of potential pathogenic (disease-causing) organisms can be present in water, and the presence of most of them is associated with leaks of untreated sewage into storm drains or other waterways. Each pathogenic organism requires a separate test to directly identify the organism in water, and many of the tests are costly, time-consuming, or of variable accuracy. In addition, many pathogenic organisms are present in low concentrations, making it possible that a sample drawn for testing may not contain enough of the organisms to be detected despite the presence of the organism in the water body. Therefore, indicator bacteria are examined to indicate the presence of sewage in water bodies; the presence of high levels of indicator bacteria indicates that untreated sewage is present in a water body and thus there is a high probability that high levels of pathogenic organisms may also be present. Fecal coliform bacteria are present in high concentrations in untreated sewage (typically much higher concentrations than pathogens) and are easily detected in water, and therefore fecal coliforms are the most commonly used indicator bacteria in surface water bodies. The levels of fecal coliform bacteria are expected to be low in the lake, as indicated in Appendix F-4 to this Draft EIR, and thus the levels of pathogenic organisms are expected to be very low as well.

### *Inadvertent Body Contact*

The lake at Hollywood Park will not be designed for swimming, boating, or other contact recreation, but the public will be encouraged to visit the lakeside paths and gardens. Because of this, inadvertent human contact with the water may occur, but should not result in health issues. Waters designated for contact recreation (e.g., swimming) must meet USEPA's 'REC1' water quality standards, while waters designated for non-contact activities (e.g., fishing or boating) must meet 'REC2' standards. The lake at Hollywood Park is not designated for any recreational uses, and therefore is not required to meet either water quality standard, but comparison of lake water quality with REC1 and REC2 standards is a useful way to examine the potential impacts of inadvertent public contact with lake water.

Based on water quality monitoring conducted at Bridgeport Lake (see Appendix F-4 for detailed supporting data), the lake is expected to meet even the stringent REC1 standards for water quality most of the time. The long-term average count of fecal coliforms in Bridgeport Lake is exactly 126 as the Most Probable Number of colony-forming units per 100 ml of water (MPN/100ml), exactly the same as the *E. coli* average in the REC-1 standard. It is important to note that the Bridgeport data includes all fecal coliforms, while the REC-1 data applies only to one type of bacteria counted in the fecal coliform test. Thus, the Bridgeport *E. coli* count is likely considerably lower than 126 MPN/100ml. The monitoring done at Bridgeport Lake was conducted for general monitoring of the lake, and was not done following the protocols used for recreational waters, therefore the Bridgeport Lake monitoring data is not strictly comparable to REC standards. However, the monitoring does give an indication of the level of bacteria expected in the lake at Hollywood Park. The monitoring data at Bridgeport Lake examines fecal coliforms. REC standards apply to counts of *E. coli*, which is one of the bacteria counted as fecal

coliforms. Thus, the monitoring data from Bridgeport Lake gives an upper limit on the level of E. coli that could be present in the lake.

USEPA REC-1 (contact recreation) and REC-2 (non-contact water recreation) standards are given below. Levels of fecal coliforms in Bridgeport Lake are, most of the time, below even the REC-1 standard. Because E. coli is only one of the bacteria that are counted as fecal coliforms, Bridgeport Lake gives an upper limit on the counts of E. coli that may be present in the lake. Similarly, the lake generally meets REC-2 standards, indicating that it will be safe for boating and similar activities. The occasional spike in bacteria counts in Bridgeport Lake is probably due to waterfowl, which can be numerous on the lake, and does not necessarily indicate any human waste in the lake.

**Table IV.F-7  
USEPA Recreational Water Quality Standards**

<b>E. Coli Concentration per 100 ml</b>			
	<b>Average</b>	<b>Single Sample Maximum</b>	
REC 1	126	235	Designated Bathing Beach
		298	Moderate Full Body Contact
		406	Lightly Used Full Body Contact
REC 2	200	576	Infrequently Used
		400	
<i>Pace Advanced Water Engineering, Technical Memorandum Re: Hollywood Park Manmade Lake – Public Health Concerns Mitigation, June 12, 2008 (Appendix F-4).</i>			

Like the Bridgeport Lake, it is anticipated that the lake at Hollywood Park will, most of the time, meet the REC-1 and REC-2 standards shown in Table IV.F-7, and thereby would be considered safe for contact and non-contact recreational activities. These activities involve prolonged contact with the water and create a greater opportunity for disease transmission than inadvertent contact would create. Therefore the lake should be considered safe for any inadvertent or accidental contact that may occur.

*Offensive Odors*

Offensive or unpleasant odors will not be present at the lake at Hollywood Park because the lake will have excellent water quality at all times and will be well aerated throughout the lake. Odors associated with lakes are typically released under conditions of low dissolved oxygen in the water and are associated with large blooms of algae, especially blue-green algae, or anaerobic lake-bottom sediments. The lake at Hollywood Park will be equipped with several water quality maintenance systems to prevent large algae

blooms by limiting the amount of available nutrients in the water. In addition, the lake will be constantly aerated by a mechanical aeration system that will maintain the dissolved oxygen near the saturation point throughout the water column. This will prevent the discharge of unpleasant odors from lake bottom sediments and prevent drops in dissolved oxygen content caused by the growth or die-off of algae in the lake.

#### *Groundwater Contamination*

The water in the lake at Hollywood Park will not mix with groundwater that may be present beneath the lake, preventing any potential for contamination of groundwater by constituents that may be in the lake, or contamination of the lake by constituents that may be present in the groundwater. The lake will be constructed with a synthetic membrane liner that will be continuous beneath the entire lake. The liner will be impermeable – waterproof – and will prevent any mixing of lake water with groundwater.

#### *Water Quality Treatment*

The lake at Hollywood Park will serve as a treatment facility for stormwater originating on the project site. The lake will receive stormwater runoff from the project site through the drainage system. The lake will be designed with several types of water quality systems to ensure that stormwater entering the lake is treated to a very high level before discharge, and that water residing in the lake is continuously treated to maintain excellent water quality in the lake at all times.

In Los Angeles County stormwater runoff treatment is required by the SUSMP that has been adopted by the County of Los Angeles and most of the cities within the county as well. The SUSMP requires a variety of measures to minimize stormwater runoff, minimize the pollution of the runoff, and treat stormwater before it is released downstream. The Hollywood Park project will follow all applicable parts of the SUSMP, including providing stormwater treatment, which will take place within the lake. The lake will be designed in a similar manner as the lake at Bridgeport, located in Los Angeles County. Bridgeport Lake has received a Water Quality Award from the Los Angeles Regional Water Quality Control Board, indicating that the lake is an accepted and outstanding approach to stormwater treatment.

Within the lake at Hollywood Park, stormwater runoff will pass through a series of treatment steps before any of the water is released downstream. The first line of stormwater treatment will occur in the pretreatment wetlands situated at the outfall from each drainage area. The pretreatment wetlands are wetlands constructed within the manmade lake at each storm drain outfall. Water from the storm drain must pass through the pretreatment wetland before entering the lake. As the water passes through the gravel substrate of the pretreatment wetland it encounters bacteria, plants, and algae that capture nutrients and degrade organic material, while sediments are trapped by adhesion or settling. Pretreatment wetlands are sized to provide 24-hour detention for the anticipated dry weather flow from each storm drain. The detention time provided for storm flows will vary, depending on the intensity of the storm. The pretreatment wetlands are not intended to meet SUSMP requirements as stand-alone stormwater treatment

facilities, but rather serve as a pretreatment before water enters the lake, which is the main treatment facility for the site.

Observed pollutant removal rates for wetlands indicate that the relatively short detention time provided by the pretreatment wetlands will provide significant water quality benefits. Appendix F-4 to this Draft EIR provides empirical data from an extended dry detention basin printed in the State of Minnesota BMP Handbook. Similar results would be expected anywhere in the US. As indicated in Appendix F-4 to this Draft EIR, even detention times as short as six hours can provide significant water quality benefits.

These stormwater pretreatment wetlands improve water quality prior to pond-input via the following mechanisms:

- sediment reduction
- settling of particulate phosphorus and metals
- denitrification and filtration by wetland plants and indigenous bacteria
- biological removal (consumption) of pesticides and hydrocarbons

The preferred detention time for surface flows varies based on density of submergent and emergent vegetation, water depth, and water temperature. Higher flows will result in lower detention time, but higher flows also have lower concentrations of water quality pollutant constituents due to dilution.

Typically the “first flush” or initial volume of surface flow to the pond will contain the highest concentrations of nutrient and other constituents (salts and trace metals) due to suspension of loose debris and minerals accumulated during dry periods. Subsequent flow after the first flush will generally be of higher quality, as these water quality constituents are essentially washed away by the first flush. More significant stormwater flows will be transported by gravity through the pretreatment wetlands and into the pond with shorter treatment retention times.

The smaller nuisance and first flush stormwater volumes will be detained in the pretreatment wetlands for a longer period. Reduction of nitrogen concentrations of 1 mg/L per day or more for water temperatures exceeding 70 degrees Fahrenheit can be expected. Reduction of phosphorus and metals via settling can occur dependent on detention time, bonding with particulate wetland carbon, and oxidation conditions in the pretreatment wetlands. Sedimentation may successfully remove over 50% of particulates in less than 6 hours of detention. Sediment that accumulates in the pretreatment wetlands will eventually need to be dredged and removed to maintain design performance. However, because the only sediment that will

enter the pretreatment wetlands will be derived from the developed portions of the site, which typically produce very little sediment, maintenance will be required only very infrequently.<sup>16</sup>

Another water quality feature of the lake will be aquatic submergent and emergent vegetation. The emergent vegetation will be largely confined to wetland planters to control its spread and simplify lake maintenance. The in-lake wetland planters provide aesthetic benefits, ecosystem value such as food and shelter for wildlife, removal of nutrients, and filtration of turbid waters. Vegetated wetland planters are similar in appearance to pretreatment wetlands, but are not connected to storm drain outfalls, and therefore do not require the periodic removal of trash or accumulated sediment. The purpose of a vegetated wetland planter is to support emergent or aquatic vegetation while containing the growth of the vegetation to a defined and easily maintained area. The vegetation provides water quality benefits, wildlife habitat, and aesthetic interest to the lake. The most common nutrients found in stormwater are nitrogen and phosphorous, and both are removed from the water by various processes that occur in lakes and wetlands. Nitrogen in lake water (i.e. ammonia, nitrate, and organic nitrogen) is converted from nitrate to nitrogen gas by anoxic bacteria in wetland sediment. Phosphorus undergoes attachment and settling to the wetland sediment. In addition, both nitrogen and phosphorus are incorporated into cell tissue by wetland plants. Nuisance algae and excessive growth of aquatic plants are generally present only in lakes with high concentrations of nutrients. Therefore, the removal of nutrients from lake water is the primary goal of the water quality systems included in the lake in this project, such as wetland planters.

Another water quality feature of the lake will be underwater biofilters. A biofilter is an underwater gravel bed through which pond water is pumped to provide treatment of the water. The lake biofilters are typically 3 to 4 feet deep, filled with gravel media and submerged 18 to 24 inches below the lake water surface. The media provides attachment sites for activated biomass used for nutrient removal. A perforated herringbone piping network will be located beneath the media for distributed water flow upward through the media for biological treatment and physical filtration. Water will be pumped through the piping network from the recirculation system pumps. Similar to a wastewater treatment nutrient removal filter, the custom gravel media biofilter is capable of high rate biological organic carbon consumption and denitrification (nitrogen conversion and removal) as compared to wetlands. Combined areas of aerobic and anoxic conditions in the biofilter, particularly on the biological flocs, provide an ideal environment for aerobic BOD reduction and nitrification and anoxic nitrate reduction. In addition, phosphorus removal via physical filtration and biological uptake has been demonstrated to occur in biofilters. Coliform, an indicator of pathogens, may be effectively removed by biological predation in the media biofilters. A biofilter is shown during construction in Appendix F-4 to this Draft EIR, with another photo of the same biofilter. Biofilters are located below the water surface and cannot be seen during normal lake operation. Biofilters require occasional backwashing to remove accumulated sediment and biological growth.

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<sup>16</sup> See Appendix F-4 for an outline of the pond maintenance plan.



Aeration will be provided for the lake in order to vertically mix the pond water, prevent stratification, and introduce dissolved oxygen into the water. Aeration for the lake will be provided via fine bubble diffusers placed at several locations on the lake bottom. Introducing compressed air to the bottom of the lake helps mix oxygen-poor bottom water to the surface, allowing it to become aerated through contact with the atmosphere. Aeration also disrupts the formation of thermal stratification in the lake, further reducing the likelihood of oxygen-poor water developing in the lake. Aerated lakes have generally better water quality, fewer problem algae blooms, and fewer problems with odors than lake that are not mechanically aerated.

The lake at Hollywood Park will also have a pumped circulation system that will work together with the biofilters. Water circulation improves the water quality in a lake by eliminating stagnant areas where high temperatures and low dissolved oxygen concentrations can lead to odors, excessive algal growth, and other aesthetic problems. Within any lake, recirculation occurs naturally via wind, convection, and wave action at low efficiency. The pumped circulation designed for this project will provide much more comprehensive circulation throughout the entire lake.

In summary, water quality impacts and safety concerns from the lake at Hollywood Park would be less than significant.

### **Land Use Equivalency Program**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of land uses would occur at relatively limited locations within the Project Site and could be accomplished using the same building parameters. There would be no substantial variation in the Project's land use plan, building pad elevations, or the depth of excavation. Potential changes in land use under the Land Use Equivalency Program would therefore have no substantial effect on the predicted loads and concentrations, BMPs, or groundwater use and their associated impacts, because only the use is changing. Specifically, surface water and groundwater water quality requirements for the Proposed Project would be the same under the Land Use Equivalency Program. Minor variations regarding foundation types or in the preparation of landscaping areas could occur, however such variation would be within the range of construction procedures anticipated to occur with the Proposed Project. In addition, development under the Land Use Equivalency Program would not cause or exacerbate any impacts that would occur under the Proposed Project.

All Project Design Features and/or recommended mitigation measures to minimize water quality impacts under the Proposed Project would be implemented, as appropriate, under the Land Use Equivalency Program. With the implementation of the mitigation measures, hydrology and water quality impacts attributable to the Land Use Equivalency Program would, therefore, be less than significant as with the Proposed Project.

## CUMULATIVE IMPACTS

Development of the Proposed Project in conjunction with the Related Projects identified in Section III (Related Projects) would result in further development within the City of Inglewood. Since the Dominguez Channel watershed is currently 96 percent developed, future urban development will, similar to the Proposed Project, mostly entail redevelopment of existing developed sites that will require the treatment of urban runoff. As discussed throughout this Section, the Proposed Project would not substantially deplete groundwater supplies, alter the existing drainage pattern (resulting in substantial erosion or flooding), or exceed storm drain capacities, and would include mitigation measures to reduce impacts related to polluted runoff during construction and operation. The Proposed Project, including Proposed Project Design Features (PDFs), would comply with adopted regulatory requirements designed by the LARWQCB to assure that regional development does not adversely affect water quality, including MS4 Permit and SUSMP requirements; General Construction Permit requirements; General Dewatering Permit requirements; benchmark Basin Plan Water Quality Objectives (WQOs), and California Toxics Rule (CTR) criteria. Any future urban development or redevelopment occurring in the Dominguez Channel watershed would be expected to comply with these requirements.

As such, the Proposed Project would not contribute to a cumulatively significant impact in any of those areas discussed. In addition, prior to construction of each of the Related Projects, an analysis of the existing drainage system and any potential individual impacts on site hydrology or the drainage system would be required. Each individual Related Project would be required to analyze its surface water flows, comply with all federal, regional and local laws and regulations pertaining to surface water quality, and develop and implement appropriate mitigation measures, similar to the analysis and mitigation measures set forth in this EIR. With appropriate project design, and compliance with the applicable federal, State and local regulations, and permit provisions, cumulative impacts related to hydrology and water quality would be less than significant.

## PROJECT DESIGN FEATURES

The following PDFs are proposed to be incorporated into the project description or were used in the basis for formulating portions of the environmental analysis with respect to hydrology and water quality impacts. As such, it is recommended that the lead agency incorporate the following project design features as conditions of project approval.

- PDF F-1. Hydrologic source controls will include minimizing runoff from impervious surfaces by routing flows to the Arroyo and Lake Park and using bioretention and other vegetated treatment control BMPs to reduce runoff volumes through evapotranspiration and infiltration.
- PDF F-2. Native and/or climate-appropriate vegetation will be utilized in at least 50% of the developed landscaped areas.

- PDF F-3. The Project's stormwater management system will include the use of the vegetated treatment BMPs, including the Arroyo and Lake Park, as well as parking lot bioretention areas and vegetated swales (where applicable).
- PDF F-4. Treatment control BMPs will be selected to address the pollutants of concern for the Project (see Appendix F-3). These treatment BMPs for the Project include the Arroyo swale, Lake Park, vegetated BMPs, and catch basin inserts. These BMPs are designed to minimize discharge of pollutants to the Maximum Extent Practicable (MEP). Types of treatment control BMPs that will be employed include swales, bioretention areas, catch basin media filtration units, and a wet pond system (e.g., Lake Park).
- PDF F-5. The Project will include numerous source controls, including education programs, animal waste bag stations, street sweeping and catch basin cleaning, an Integrated Pest Management (IPM) Program per the LAUSD standards for common area landscaping in commercial and multi-family residential areas, use of native and/or non-invasive vegetation, product substitution to minimize zinc and copper roofing materials, and directing runoff to vegetated areas.
- PDF F-6. An education program will be implemented that includes both the education of residents and commercial businesses regarding water quality issues. Topics will include services that could affect water quality, such as carpet cleaners and others that may not properly dispose of cleaning wastes; community car washes (e.g., fund raisers); and residential car washing. The education program will emphasize animal waste management, such as the importance of cleaning up after pets and not feeding pigeons, seagulls, ducks, and geese.
- PDF F-7. The Arroyo swale will be designed to safely convey storm flows without scouring the bottom, eroding banks, or re-suspending sediment.
- PDF F-8. All shorelines within Lake Park will be landscaped and maintained to prevent erosion.
- PDF F-9. All storm drain inlets and water quality inlets will be stenciled or labeled.
- PDF F-10. "No Dumping" signs will be posted around the Arroyo and Lake Park and any other locations that appear prone to illicit dumping.
- PDF F-11. The Home Owners' Associations will maintain stencils and signs described in PDF F-9 and PDF F-10.
- PDF F-12. Pesticides, fertilizers, paints, and other hazardous materials used for maintenance of common areas, parks, commercial areas, and multifamily residential common areas will be kept offsite or in enclosed storage areas.

- PDF F-13. All trash containers will be covered to prevent contact with stormwater.
- PDF F-14. The Home Owners' Associations or a Landscape Maintenance District will be responsible for operations and maintenance of the Arroyo, Lake Park, vegetated BMPs, and catch basin media filtration BMPs. Maintenance will be in accordance with a maintenance manual approved by the Director of Planning and Building.
- PDF F-15. Stormwater treatment facilities will be designed to meet or exceed the sizing standards in the LA County SUSMP requirements.
- PDF F-16. Volume-based treatment control BMPs for the Project (i.e., Lake Park, vegetated volume-based BMPs) will be designed to capture 80 percent or more of the annual runoff volume per criteria 2 of the SUSMP.
- PDF F-17. Flow-based BMPs (e.g., the Arroyo, vegetated flow-based BMPs) will be sized using criteria 3, which will provide 80 percent capture or more of annual runoff volume per criteria of the SUSMP.
- PDF F-18. As portions of the site are designed, the size of the facilities will be finalized during the design stage for that portion of the Project by the Project engineer with the final hydrology study, which will be approved by the County of Los Angeles and the City of Inglewood prior to issuing the grading permit(s).
- PDF F-19. The structural BMPs in the stormwater treatment system will be configured to achieve treatment in multiple BMP facilities for the majority of the developed areas. This "treatment train" approach provides more reliable and consistent pollutant removal.
- PDF F-20. Loading dock areas will be covered or designed to minimize run-on and will include catch basin inserts or other appropriate treatment control BMP for treating all runoff prior to discharging to the storm drain system.
- PDF F-21. Direct connections to storm drains from depressed loading docks (truck wells) will be prohibited.
- PDF F-22. Loading docks will be kept in a clean and orderly condition through weekly sweeping and litter control at a minimum, and immediate cleanup of spills and broken containers without the use of water.
- PDF F-23. Commercial areas will not have repair/maintenance bays or the bays will comply with design requirements.

- PDF F-24. Areas for washing/steam cleaning of vehicles will be self-contained or covered with a roof or overhang; will be equipped with wash racks and with the prior approval of the sewerage agency; will be equipped with a clarifier or other pretreatment facility, and will be properly connected to a sanitary sewer.
- PDF F-25. Retail gasoline outlets or fueling areas will not be included in the Hollywood Park redevelopment.
- PDF F-26. Automotive repair shops will not be included in the Hollywood Park redevelopment.
- PDF F-27. Where feasible, commercial and multifamily parking lots will incorporate vegetated swales or bioretention facilities located in islands or perimeter landscaped areas to promote filtration and infiltration of runoff.
- PDF F-28. Catch basin inserts or media filter vaults will be used to treat parking lot runoff from all areas not treated by vegetated BMPs.
- PDF F-29. Treatment of runoff in bioretention (or vegetated swales) and catch basin inserts will be used to address oil and petroleum hydrocarbons from high-use parking lots.
- PDF F-30. Mosquito fish will be introduced into the pond to naturally control the population of mosquitoes and midges.

## MITIGATION MEASURES

The following mitigation measures are recommended to reduce impacts related to polluted runoff during project construction and operation:

### Construction

- MM F-1. All waste shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.
- MM F-2. Leaks, drips and spills shall be cleaned immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- MM F-3. Hosing down of pavement at material spills shall be prohibited. Dry cleanup methods shall be used whenever possible.

- MM F-4. Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or covered with tarps or plastic sheeting.
- MM F-5. Gravel approaches shall be used where truck traffic is frequent to reduce soil compaction and limit the tracking of sediment into streets.
- MM F-6. All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- MM F-7. Prior to issuance of any grading, building or B-Permit, a Stormwater Pollution Prevention Plan (SWPPP) shall be prepared for the Proposed Project. The SWPPP shall identify temporary Best Management Practices (BMPs) to be implemented in accordance with the General Construction Permit issued by the Regional Water Quality Control Board (RWQCB).

### **Operation**

- MM F-8. At a minimum, the Proposed Project shall implement stormwater BMPs to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the LACDPW Development Planning Manual for Stormwater Management (Manual for Standard Urban Stormwater Plan). A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard shall be required.
- MM F-9. The Proposed Project shall be designed such that post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increase peak stormwater discharge rate will result in increased potential for downstream erosion. A signed certificate from a California licensed civil engineer to confirm that the Proposed Project is designed in such a manner shall be required.
- MM F-10. Appropriate erosion control and drainage devices shall be incorporated, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures. Outlets of culverts, conduits or channels shall be protected from erosion by discharge velocities by installing rock outlet protection. (Rock outlet protection is a physical device composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe.) Sediment traps shall be installed below the pipe-outlet. Outlet protection shall be inspected, repaired, and maintained after each significant rain.

- MM F-11. Potentially hazardous materials with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar structure; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- MM F-12. Storage areas for hazardous materials shall be paved and sufficiently impervious to contain leaks and spills.
- MM F-13. Storage areas for hazardous materials shall have a roof or awning to minimize collection of stormwater within the secondary containment area.
- MM F-14. Runoff shall be treated prior to release into the storm drain. Three types of treatments are available: (1) dynamic flow separator; (2) a filtration or (3) infiltration. Dynamic flow separator uses hydrodynamic force to remove debris, and oil and grease, and is located underground. Filtration utilizes catch basins with filter inserts. Infiltration methods are typically constructed on-site and are determined by various factors such as soil types and groundwater table. If utilized, filter inserts shall be inspected every six months and after major storms, and cleaned at least twice a year.
- MM F-15. At least 2,200 linear feet of swales or bioretention areas (i.e., vegetated BMPs) will be used in the mixed use area and high use parking lots to address trash and debris and petroleum hydrocarbons.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

As discussed above, threshold question (i) does not apply to this analysis and no further discussion is warranted.

With respect to threshold questions (a) and (f), the Proposed Project would not violate any water quality standards or waste discharge requirements, and would not otherwise substantially degrade water quality. Implementation of the above identified PDF's and mitigation measures which are recommended to reduce impacts related to polluted runoff would ensure that the Proposed Project is designed and developed in a manner that ensures water quality standards are met.

With respect to threshold questions (b) and (c), the Proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table levels (see Appendix F-6 to this Draft EIR regarding groundwater). The proposed increase in effective imperviousness (due to both the addition of drainage area that is not retained, as well as the increase in impervious surface area) would not substantially interfere with groundwater recharge. In addition, the Proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the

course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. Implementation of the above identified PDF's and mitigation measures recommended to reduce impacts related to erosion and siltation would ensure that the Proposed Project is designed and developed in a manner that ensures water quality and hydrology impacts are minimized to insignificant levels.

With respect to threshold questions (d) and (e), the Proposed Project would not create or contribute runoff water that would exceed the capacity of existing planned stormwater drainage systems or provide substantial additional sources of polluted runoff, and would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Implementation of the above identified PDF's (which include hydrologic source controls and treatment control BMP's to ensure stormwater runoff volumes are adequately managed, as well as mitigation measures designed to reduce impacts related to polluted runoff during project construction and operation) would ensure that the Proposed Project is designed and developed in a manner that ensures storm drain systems are not adversely impacted, flood hazard is mitigated, and runoff is not polluted. Thus, impacts would be less than significant.

With respect to threshold questions (g), (h) and (j), the Proposed Project would not place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, would not place structures within a 100-year floor plain or redirect flood flows, and would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. Implementation of the above identified PDF's (which include BMP's designed to capture annual site runoff volumes consistent with the criteria of the SUSMP and the LACDPW Development Planning Manual for Stormwater Management) would ensure that the Proposed Project is designed and developed in a manner that ensures potential flood hazard impacts are minimized to insignificant levels.

The Proposed Project's impacts to hydrology and water quality, including waste discharge requirements, groundwater supplies, groundwater recharge, drainage patterns, flood hazard and flood water flows, and stormwater drainage systems, would therefore be less than significant after mitigation.



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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### G. NOISE

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The following analysis of noise and vibration impacts is based on the Air Quality and Noise Technical Report prepared by Terry A. Hayes Associates LLC (TAHA), dated August 21, 2008. This report is included in its entirety as Appendix B of this Draft EIR.

This section evaluates noise and vibration impacts associated with the implementation of the Proposed Project, including the proposed Equivalency Program. The noise and vibration analysis in this section assesses the following: existing noise and vibration conditions at the project site and its vicinity, as well as short-term construction and long-term operational noise and vibration impacts associated with the Proposed Project, including the proposed Equivalency Program.

#### EXISTING CONDITIONS

##### Noise and Vibration Characteristics and Effects

###### *Noise*

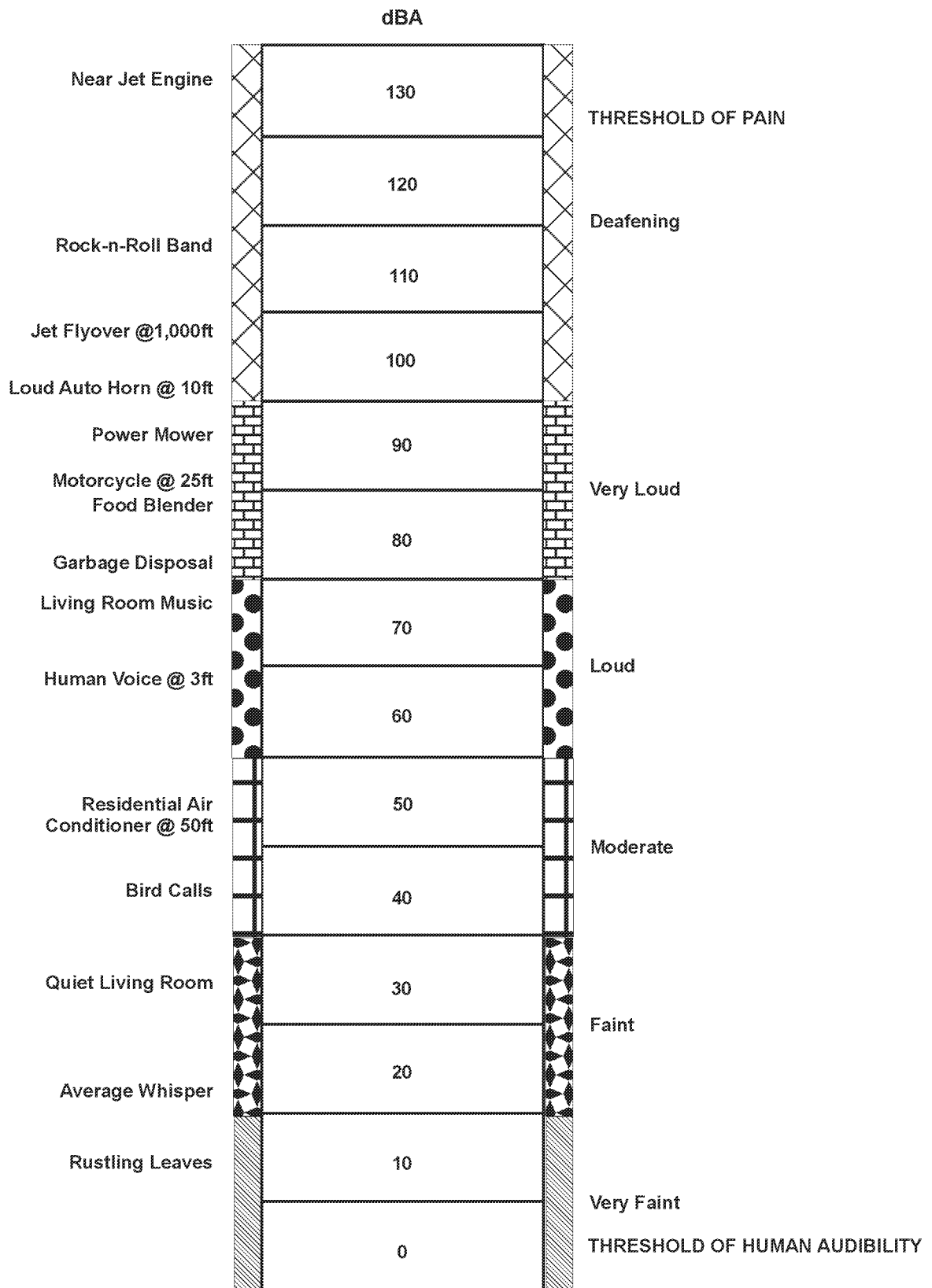
Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The “A-weighted scale,” abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately three to 140 dBA. Figure IV.G-1 provides examples of A-weighted noise levels from common sounds.

###### *Definitions*

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level ( $L_{eq}$ ).

###### *Community Noise Equivalent Level*

CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually five decibels higher than if it occurred from 7:00 a.m. to 7:00 p.m. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were ten dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional five decibels to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and ten dBA to sound levels in the night before 7:00 a.m. and after 10:00 p.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour average.



Source: TAHA, 2007 and Cowan, James P., Handbook of Environmental Acoustics.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

Figure IV.G-1  
A-Weighted Decibel Scale

### *Equivalent Noise Level*

$L_{eq}$  is the average noise level on an energy basis for any specific time period. The  $L_{eq}$  for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound.  $L_{eq}$  can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

### *Effects of Noise*

Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment range from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

### *Audible Noise Changes*

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately three dBA. A change of at least five dBA would be noticeable and would likely evoke a community reaction. A ten-dBA increase is subjectively heard as a doubling in loudness and would most certainly cause a community response.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately six dBA over hard surfaces and 7.5 dBA over soft surfaces for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately three dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of the distance.

Generally, noise is most audible when traveling by direct line-of-sight.<sup>1</sup> Barriers, such as walls, berms, or buildings, that break the line-of-sight between the source and the receiver greatly reduces noise levels from the source since sound can only reach the receiver by bending over the top of the barrier (diffraction). Sound barriers can reduce sound levels by up to 20 dBA. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced. In situations where the source or the receiver is located three meters (approximately 9.84 feet) above the ground, or whenever the line-of-sight averages more than three meters above the ground, sound levels would be reduced by approximately three decibels for each doubling of distance.

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<sup>1</sup> *Line-of-sight is an unobstructed visual path between the noise source and the noise receptor.*

### *Applicable Regulations*

The City of Inglewood Noise Element has identified several goals for controlling community noise.<sup>2</sup> These goals include reducing noise where the noise environment represents a threat to the public health and welfare, reducing noise impacts in degraded areas, protecting and maintaining areas that have acceptable noise environments, and providing sufficient information concerning community noise levels so that noise can be objectively considered in land use planning decisions. To implement these goals, the City adopted a Noise Ordinance, as discussed below.

Article 2 (Noise Regulations) under Chapter 5, (Offenses, Miscellaneous) of the Inglewood Municipal Code establishes criteria and standards for the regulation of noise levels within the City. Section 5-29 of the City Municipal Code states that it is unlawful for any person at any location to create any noise, or to allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by that person, when the foregoing causes the noise level, when measured on any other property, to exceed any noise for the cumulative time periods specified in the Noise Ordinance. Section 5-27 of the City Municipal Code establishes base ambient noise levels to be used to evaluate changes in noise levels. Actual measurements exceeding the noise levels at the time and within the zones defined in Table IV.G-1 shall be used as the new base ambient noise level and no ambient noise shall be less than the noise level specified in Table IV.G-1. Section 5-30 of the City Municipal Code establishes maximum residential exterior and interior noise levels. Table IV.G-2 shows the maximum residential exterior and interior noise levels.

**Table IV.G-1  
Existing Estimated Community Noise Equivalent Level**

<b>Decibels</b>	<b>Time</b>	<b>Land Use Zone</b>
45 dBA	10:00 p.m. – 7:00 a.m.	Residential
55 dBA	7:00 a.m. – 10:00 p.m.	Residential
65 dBA	Anytime	Commercial and Uses Not Specified
75 dBA	Anytime	Industrial

*Source: City of Inglewood Municipal Code, Section 5-30 (Maximum Residential Noise Level) of Article 2 (Noise Regulations) of Chapter 5 (Offenses, Miscellaneous), September 13, 1988.*

The City Municipal Code also regulates non-residential noise levels and construction noise. Section 5-31 (Maximum Nonresidential Noise Levels) states that noise levels at the exterior of non-residential properties shall not exceed the respective base ambient noise levels for commercial and industrial land uses for a maximum cumulative duration of 30 minutes in any hour. Section 5-41 (Construction of Building and Projects, Noise Regulated) states that it is unlawful for any person within a residential zone, or within 500 feet of a residential zone, to operate construction equipment or perform any outside

<sup>2</sup> *City of Inglewood, Noise Element of the General Plan, September 1, 1987.*

construction or repair work between the hours of 8:00 p.m. and 7:00 a.m. in such a manner that causes annoyance or discomfort unless a permit has been obtained from the Permits and Licenses Committee of the City. Section 5-41 does not restrict construction activity to weekdays only.

**Table IV.G-2  
Maximum Residential Noise Levels**

<b>Exterior Noise Levels Exceeded</b>	<b>Maximum Duration Period</b>
Base Ambient Noise Level (BANL)	30 Minutes in Any Hour
5 dBA above BANL	15 Minutes in Any Hour
10 dBA above BANL	5 Minutes in Any Hour
15 dBA above BANL	1 Minute in Any Hour
20 dBA above BANL	Not Permitted
<b>Interior Noise Levels Exceeded</b>	<b>Maximum Duration Period</b>
BANL	5 Minutes in Any Hour
5 dBA above BANL	1 Minute in Any Hour
10 dBA above BANL	Not Permitted

*Source: City of Inglewood Municipal Code, Section 5-30 (Maximum Residential Noise Level) of Article 2 (Noise Regulations) of Chapter 5 (Offenses, Miscellaneous), September 13, 1988.*

## **Vibration**

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

## **Definitions**

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation

(Vdb) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.<sup>3</sup>

### *Effects of Vibration*

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of ground-borne vibration may damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes).

To counter the effects of ground-borne vibration, the Federal Railway Administration (FRA) and the Federal Transportation Administration (FTA) have published guidance relative to vibration impacts. According to the FRA, fragile buildings can be exposed to ground-borne vibration levels of 0.5 inches per second PPV without experiencing structural damage.<sup>4</sup> Table IV.G-3 shows FTA thresholds for RMS vibration levels.

**Table IV.G-3  
FTA Vibration Impact Criteria**

Land Use Category	Vibration Impact Level for Frequent Events (VdB) <sup>a</sup>	Vibration Impact Level for Occasional Events (VdB) <sup>b</sup>	Vibration Impact Level for Infrequent Events (VdB) <sup>c</sup>
Category 1: Buildings where low ambient vibration is essential for interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime uses	75	78	83

<sup>a</sup> Frequent events are defined as more than 70 vibration events of the same source per day.  
<sup>b</sup> Occasional events are defined as between 30 and 70 vibration events of the same source per day.  
<sup>c</sup> Infrequent events are defined as fewer than 30 vibration events of the same source per day.  
Source: TAHA, 2008.

### *Perceptible Vibration Changes*

In contrast to noise, ground-borne vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans which is around 65 RMS.<sup>5</sup> Most perceptible indoor vibration is

<sup>3</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

<sup>4</sup> Federal Railway Administration, *High-Speed Ground Transportation Noise and Vibration Impact Assessment*, October 2005.

<sup>5</sup> Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

#### *Applicable Regulations*

There are no adopted City standards for ground-borne vibration.

#### *Existing Noise and Vibration Environment*

The existing noise environment of the project area is characterized by vehicular traffic, aircraft, and noises typical to a dense urban area (e.g., people conversing). Vehicular traffic is the primary source of noise in the project vicinity.

Sound measurements were taken using a Quest Q-400 Noise Dosimeter between 8:30 a.m. and 11:00 a.m. on June 5, 2007 to ascertain existing ambient daytime noise levels in the project vicinity. Noise monitoring locations are shown in Figure IV.G-2. As shown in Table IV.G-4, existing ambient sound levels range between 61.2 and 74.7 dBA ( $L_{eq}$ ).

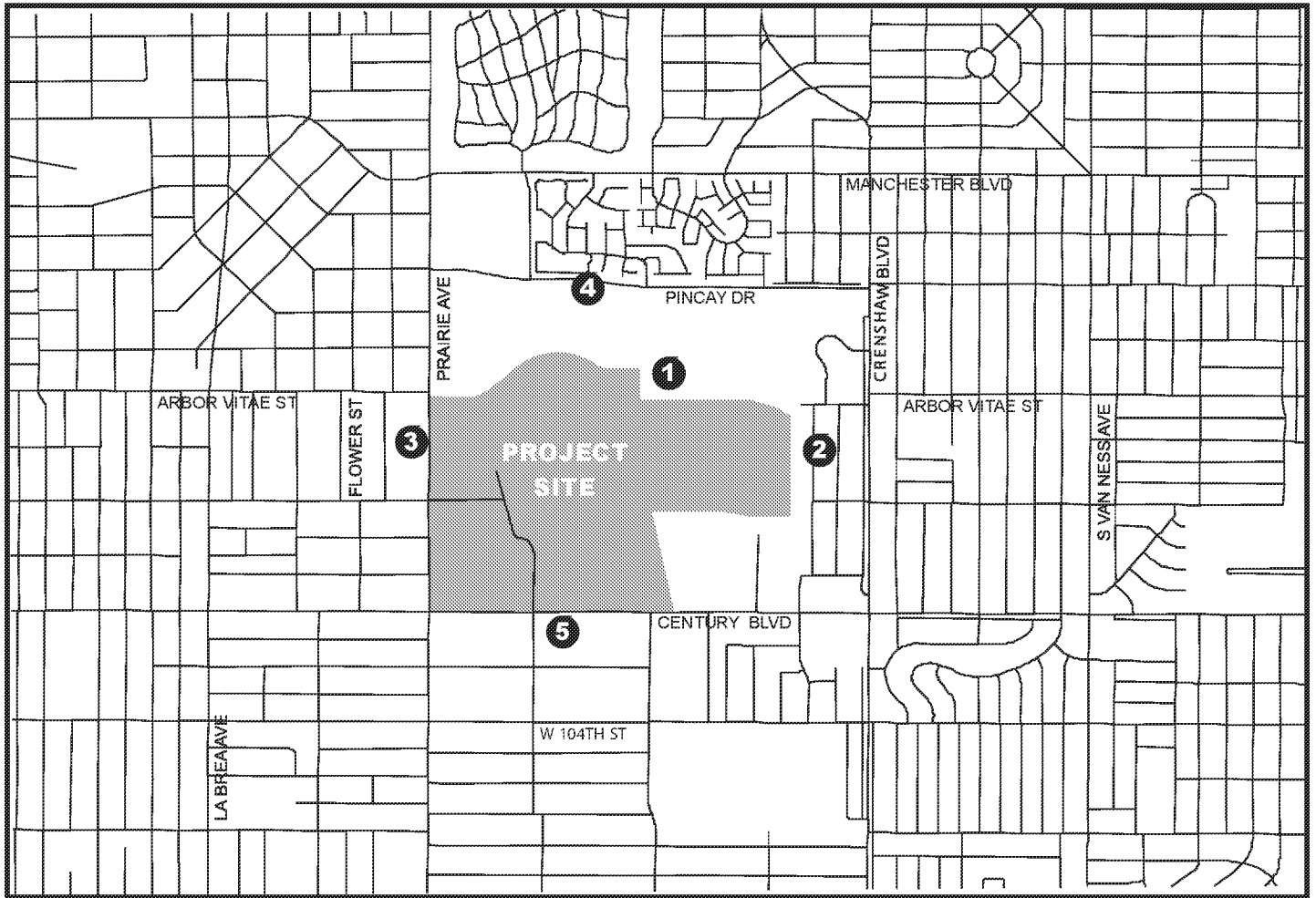
**Table IV.G-4  
Existing Noise Levels**

Noise Monitoring Locations	Affected Land Uses	Measurement Duration	Primary Noise Sources	Sound Level (dBA, $L_{eq}$ )
1	Single-Family Residence - Northeast Corner of Project Site	15 minutes	Automobiles and Aircrafts	61.2
2	Single-Family Residence - East of Project Site	15 minutes	Automobiles and Aircrafts	66.7
3	Prairie Avenue	15 minutes	Aircrafts	72.6
4	Pincay Drive	15 minutes	Aircrafts	73.1
5	Century Boulevard	15 minutes	Automobiles and Aircrafts	74.7

Source: TAHA, 2008.

Figure IV.G-3 displays CNEL noise contours at Los Angeles International Airport (LAX) during the fourth quarter of 2005.<sup>6</sup> As shown, the 65 dBA CNEL noise contours for the southern LAX runway extend onto the southern portion of the project site.

<sup>6</sup> Los Angeles World Airports, <http://www.lawa.org/lax/laxContourMaps.cfm>, accessed May 29, 2007.



**Legend**

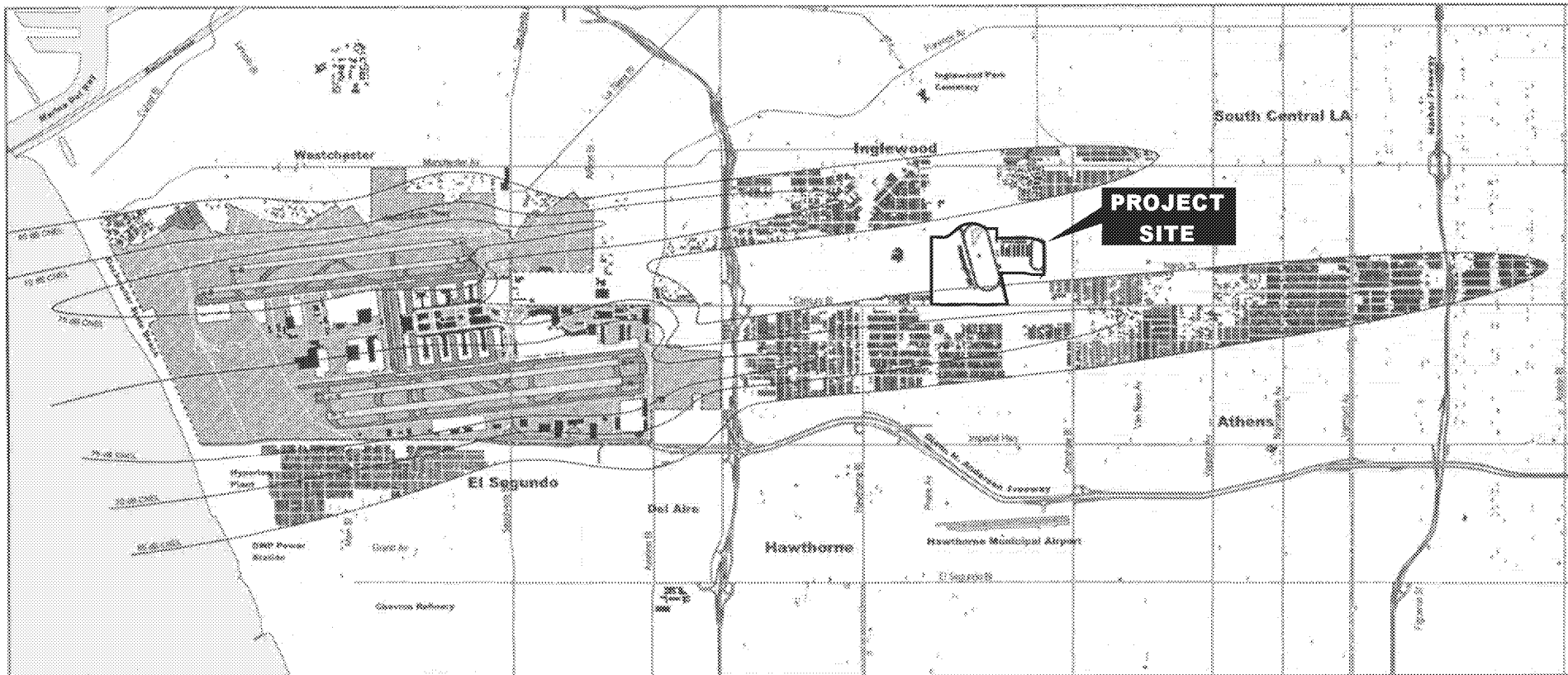
Noise Monitoring Locations

- 1. Multi-Family Residence-Northeast Corner of Project Site
- 2. Single-Family Residence-East of Project Site
- 3. Prairie Avenue
- 4. Pincay Drive
- 5. Century Boulevard






Source: TAHA, 2007.











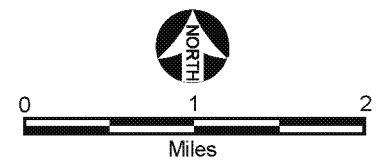


**Legend**

-  Residential - Single-Family within Contour
-  Residential - Multi-Family within Contour
-  Airport Property

 Project Site

-  Landmarks
-  Churches
-  Hospitals
-  Schools
-  Noise Contours
-  Airport Boundary
-  Freeways
-  Streets



Source: TAHA 2007 and Los Angeles World Airports.

Similar to the environmental setting for noise, the vibration environment is dominated by traffic from nearby roadways. Heavy trucks can generate ground-borne vibrations that vary depending on vehicle type, weight, and pavement conditions. As heavy trucks typically operate on major streets, existing ground-borne vibration in the project vicinity is largely related to heavy truck traffic on the surrounding roadway network. Based on field visits to the project site, vibration levels from adjacent roadways are not perceptible at the project site.

### *Sensitive Receptors*

Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise. Figure IV.G-4 shows sensitive receptors within one-quarter mile (1,320 feet) of the project site.

Residential sensitive receptors include the following:

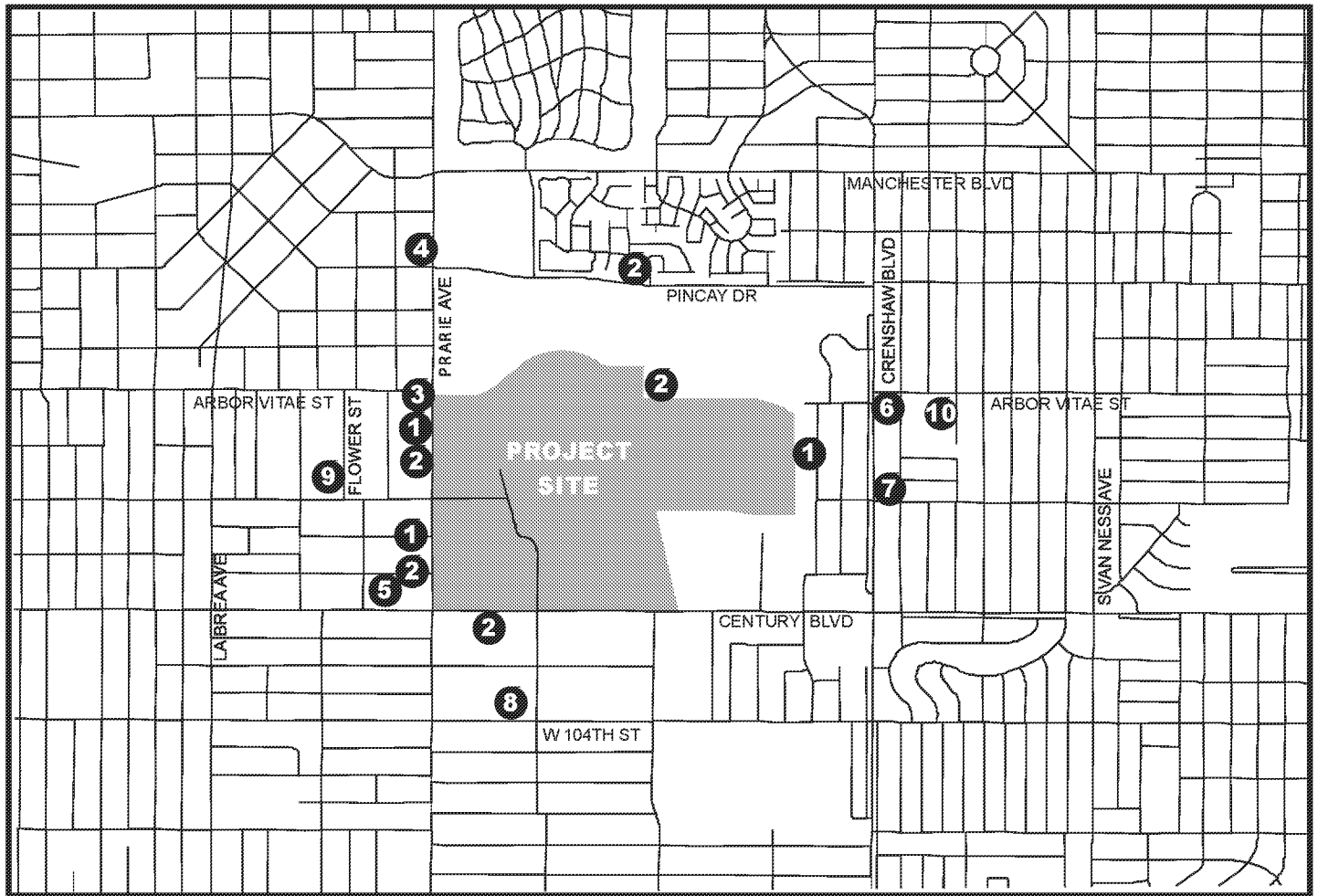
- Single-family residences located adjacent and to the east of the project site;
- Single-family residences located adjacent and to the northeast of the project site;<sup>7</sup>
- Single- and multi-family residences located approximately 75 feet west of the project site;
- Multi-family residences located approximately 75 feet south of the project site; and
- Single-family residences located approximately 500 feet north of the project site.

Institutional sensitive receptors include the following:

- Inglewood Junior Academy located approximately 75 feet west of the project site;
- William H. Kelso Elementary School located approximately 125 feet west of the project Site;
- Greater New Bethel Baptist Church located approximately 675 feet west of the project site;
- Holy Trinity Evangelical Lutheran Church located approximately 850 feet east of the project site;
- First Church of God located approximately 900 feet east of the project site;

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<sup>7</sup> The single-family residences located adjacent and to the northeast of the project site are separated from the project site by an existing 5-foot solid wall.



## Legend

# Sensitive Receptors

1. Single-Family Residence
2. Multi-Family Residence
3. Inglewood Junior Academy
4. William H. Kelso Elementary School
5. Greater New Bethel Baptist Church
6. Holy Trinity Evangelical Lutheran Church
7. First Church of God
8. Inglewood Southside Christian Church
9. Centinela Hospital
10. Warren Lane Elementary



Source: TAHA, 2007.

- Inglewood Southside Christian Church located approximately 1,100 feet south of the project site;
- Centinela Hospital located approximately 1,100 feet west of the project site; and
- Warren Lane Elementary School located approximately 1,175 feet east of the project site.

The above sensitive receptors represent the nearest residential and institutional land uses with the potential to be impacted by the proposed project. Additional single- and multi-family residences are located in the surrounding community within one-quarter mile of the project site.

### *Vehicular Traffic*

As stated earlier, vehicular traffic is the predominant noise source in the project vicinity. Using existing traffic volumes (PM peak and Saturday midday volumes) provided by the project traffic consultant and the Federal Highway Administration (FHWA) RD-77-108 noise calculation formulas, CNEL was calculated for various roadway segments near the project site. Existing weekday and weekend mobile noise levels are shown in Table IV.G-5 and Table IV.G-6, respectively. As shown in Table IV.G-5, weekday mobile noise levels in the project area range from 52.8 to 72.9 dBA (CNEL). As shown in Table IV.G-6, weekend mobile noise levels in the project area range from 53.3 to 73.2 dBA (CNEL). Modeled vehicle noise levels are typically lower than the noise measurements along similar roadway segments as modeled noise levels do not take into account additional noise sources (e.g., pedestrians).

**Table IV.G-5  
Existing Estimated Community Noise Equivalent Level – Weekday <sup>a</sup>**

Roadway Segment	Adjacent Land Uses	Estimated dBA (CNEL)
Manchester Boulevard between Prairie Avenue and Crenshaw Boulevard	Residential	70.7
Pincay Drive between Prairie Avenue and Crenshaw Boulevard	Residential	69.6
Arbor Vitae Street between La Brea Avenue and Prairie Avenue	Residential	67.5
Century Boulevard between La Brea Avenue and Prairie Avenue	Residential	72.4
Century Boulevard between Prairie Avenue and Crenshaw Boulevard	Residential, Commercial	72.9
Prairie Avenue between Manchester Boulevard and Century Boulevard	Residential	72.1
Prairie Avenue between Century Boulevard and Imperial Highway	Residential, Commercial	72.4
Kareem Court between Manchester Boulevard and Pincay Drive	Residential	52.8
Crenshaw Boulevard between Manchester Boulevard and Century Boulevard	Residential	71.8
Crenshaw Boulevard between Century Boulevard and Imperial Highway	Residential, Commercial	72.2

<sup>a</sup> The predicted CNEL for each roadway segment was calculated as peak hour  $L_{eq}$  and converted into CNEL using the California Department of Transportation Technical Noise Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of ADT and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.

Source: TAHA, 2008.

**Table IV.G-6  
Existing Estimated Community Noise Equivalent Level – Weekend <sup>a</sup>**

Roadway Segment	Adjacent Land Uses	Estimated dBA (CNEL)
Manchester Boulevard between Prairie Avenue and Crenshaw Boulevard	Residential	70.0
Pincay Drive between Prairie Avenue and Crenshaw Boulevard	Residential	67.2
Arbor Vitae Street between La Brea Avenue and Prairie Avenue	Residential	66.2
Century Boulevard between La Brea Avenue and Prairie Avenue	Residential	72.0
Century Boulevard between Prairie Avenue and Crenshaw Boulevard	Residential, Commercial	73.2
Prairie Avenue between Manchester Boulevard and Century Boulevard	Residential	72.1
Prairie Avenue between Century Boulevard and Imperial Highway	Residential, Commercial	72.3
Kareem Court between Manchester Boulevard and Pincay Drive	Residential	53.3
Crenshaw Boulevard between Manchester Boulevard and Century Boulevard	Residential	72.8
Crenshaw Boulevard between Century Boulevard and Imperial Highway	Residential, Commercial	73.1

<sup>a</sup> The predicted CNEL for each roadway segment was calculated as peak hour  $L_{eq}$  and converted into CNEL using the California Department of Transportation Technical Noise Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of ADT and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.

Source: TAHA, 2008.

## ENVIRONMENTAL IMPACT

### Analytical Methodology

Construction and operational point source noise impacts were evaluated by comparing anticipated noise levels to the guidelines set forth in the Municipal Code. Roadway noise impacts were projected using the FHWA RD-77-108 prediction model. This methodology allows the user to define roadway configurations, barrier information (if any), and receiver locations. Roadway-noise attributable to project development was calculated and compared to baseline noise levels to determine significance. Ground-borne vibration impacts were evaluated by identifying potential vibration sources, measuring the distance between vibration sources and surrounding structure locations, and making a significance determination.

### **Threshold of Significance**

To determine whether a proposed project would have a significant impact to noise, Appendix G to the State CEQA Guidelines questions whether a project would:

- a) Expose persons to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies;
- b) Expose persons to or generate excessive groundborne vibration or groundborne noise levels;
- c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- e) Expose people residing or working in the project area to excessive noise levels within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; or
- f) Expose people residing or working in the project area to excessive noise levels within the vicinity of a private airstrip.

Specific threshold related to the above general thresholds are presented below for construction and operational activity.





#### ***Construction Phase Significance Criteria***

The proposed project would have a significant impact if:

- Construction activity would occur outside of the hours permitted by the City's noise ordinance (i.e., between the hours of 8:00 p.m. and 7:00 a.m.), unless a permit has been obtained from the Permits and Licenses Committee of the City;
- Construction activity increase ambient noise levels by five dBA or more; or
- Heavy-duty truck noise levels would increase by three decibels (CNEL) to or within the "normally unacceptable" or "clearly unacceptable" category (Table IV.G-7) or any five decibel or more increase in noise level.

**Table IV.G-7  
Land Use Compatibility for Community Noise Environments**

LAND USE CATEGORY	Community Noise Exposure (dBA, CNEL)					
	55	60	65	70	75	80
Residential - Low Density Single-Family, Duplex, Mobile Homes	Normally Acceptable	Normally Acceptable	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Clearly Unacceptable
Residential - Multi-Family	Normally Acceptable	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Clearly Unacceptable	Clearly Unacceptable
Transient Lodging - Motels Hotels	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Clearly Unacceptable
Schools, Libraries, Churches, Hospitals, Nursing Homes	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Clearly Unacceptable
Auditoriums, Concert Halls, Amphitheaters	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Clearly Unacceptable
Sports Arena, Outdoor Spectator Sports	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Clearly Unacceptable
Playgrounds, Neighborhood Parks	Normally Acceptable	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Clearly Unacceptable
Golf Courses, Riding Stables, Water Recreation, Cemeteries	Normally Acceptable	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Clearly Unacceptable
Office Buildings, Business Commercial and Professional	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Clearly Unacceptable
Industrial, Manufacturing, Utilities, Agriculture	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Clearly Unacceptable

	<b>Normally Acceptable</b> - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
	<b>Conditionally Acceptable</b> - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditionally will normally suffice.
	<b>Normally Unacceptable</b> - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
	<b>Clearly Unacceptable</b> - New construction or development should generally not be undertaken.

*Source: California Office of Noise Control, Department of Health Services.*

### ***Operations Phase Significance Criteria***

The proposed project would have a significant impact if:

- Mobile noise levels would increase by three decibels (CNEL) to or within the “normally unacceptable” or “clearly unacceptable” category (Table IV.G-7) or any five decibel or more increase in noise level;
- The proposed project would expose existing sensitive receptors to noise levels that exceed the Municipal Code standards. If existing noise levels exceed the noise standards, a significant impact would occur if project-related vehicular noise results in a three dBA increase; or
- Proposed sensitive receptors would be exposed to interior noise levels greater than 45 dBA.

### ***Ground-borne Vibration Significance Criteria***

The proposed project would have a significant impact if:

- The proposed project would expose buildings to the FRA building damage threshold level of 0.5 inches per second PPV; or
- The proposed project would exceed the FTA vibration impact criteria presented in Table IV.G-3.

### **Impacts Determined to be Less Than Significant**

The proposed project would not be located near a private airport. Therefore, threshold question (f) does not apply to this analysis and no further discussion is warranted.

### **Construction Phase Impacts**

#### ***Noise***

Construction of the proposed project would result in temporary increases in ambient noise levels in the project area on an intermittent basis. The increase in noise would likely result in a temporary annoyance during construction. Noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers.

Construction activities require the use of numerous noise generating equipment, such as jack hammers, pneumatic impact equipment, saws, and tractors. The proposed project would utilize heavy-duty construction equipment and caisson drilling equipment. The proposed project would not include pile driving. Typical noise levels from various types of equipment that may be used during construction are listed in Table IV.G-8. The table shows noise levels at distances of 50 and 100 feet from the construction noise source.



**Table IV.G-8  
Maximum Noise Levels of Construction Equipment**

Noise Source	Noise Level (dBA) <sup>a</sup>	
	50 Feet	100 Feet
Jackhammer	88	82
Grader	85	79
Street Paver	89	83
Backhoe	80	74
Street Compressor	82	76
Front-end Loader	85	79
Scraper	89	83
Idling Haul Truck	88	82
Concrete Pump	82	76

<sup>a</sup> Assumes a six decibel drop-off rate for noise generated by a "point source" and traveling over hard surfaces. Actual measured noise levels of the equipment listed in this table were taken at distances of 10 and 30 feet from the noise source.

Source: Federal Railroad Administration, High-Speed Ground Transportation Noise and Vibration Impact Assessment, October 2005.

Whereas Table IV.G-8 shows the noise level of each piece of construction equipment, the noise levels shown in Table IV.G-9 take into account the likelihood that more than one piece of construction equipment would be in operation at the same time and lists the typical overall noise levels that would be expected for each phase of construction. These noise levels are based on surveys conducted by the USEPA in the early 1970s. Since 1970, regulations have been enforced to improve noise generated by certain types of construction equipment to meet worker noise exposure standards. However, many older pieces of equipment are still in use. Thus, the construction phase noise levels indicated in Table IV.G-9 represent worst-case conditions from simultaneous operation of multiple pieces of equipment. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. The noise source is assumed to be active for 40 percent of the eight-hour work day (consistent with the USEPA studies of construction noise), generating a noise level of 89 dBA at a reference distance of 50 feet.

Table IV.G-10 displays unmitigated construction-related noise levels at sensitive receptors nearest to the project site. As shown, construction-related ambient noise levels would exceed the five dBA significance threshold at sensitive receptors near the project site. As such, construction activity would result in a significant noise impact without implementation of mitigation measures.

**Table IV.G-9  
Outdoor Construction Noise Levels**

Construction Phase	Noise Level (dBA)				
	50 Feet	100 Feet	200 Feet	400 Feet	800 Feet
Ground Clearing	84	78	72	66	60
Grading/Excavation	89	83	77	71	65
Foundations	78	72	66	60	54
Structural	85	79	73	67	61
Finishing	89	83	77	71	65

*Source: Environmental Protection Agency, 1971. Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PG 206717..*  
*Source: TAHA, 2008*

**Table IV.G-10  
Construction Noise Levels - Unmitigated**

Nearest Sensitive Receptors	Distance (feet) <sup>a</sup>	Maximum Construction Noise Level (dBA) <sup>b</sup>	Existing Ambient (dBA, L <sub>eq</sub> ) <sup>c</sup>	New Ambient (dBA, L <sub>eq</sub> ) <sup>d</sup>	Increase (dBA, L <sub>eq</sub> ) <sup>f</sup>
Residences Northeast of the Project Site	Adjacent	84	61.2	84.0	22.8
Residences East of the Project Site <sup>e</sup>	Adjacent	89	66.7	89.0	22.3
Residences West of the Project Site	75	86	72.6	86.2	13.6
Residences South of the Project Site	75	86	74.7	86.3	11.6
Inglewood Junior Academy	75	86	72.6	86.2	13.6
William H. Kelso Elementary School	125	81	72.6	81.6	9.0
Residences North of the Project Site	500	69	73.1	74.5	1.4

<sup>a</sup> Distance of noise source from receptor.  
<sup>b</sup> Construction noise source's sound level at receptor location, with distance adjustment.  
<sup>c</sup> Pre-construction activity ambient sound level at receptor location.  
<sup>d</sup> New sound level at receptor location during the construction period, including noise from construction activity.  
<sup>e</sup> Includes a five dBA reduction for an existing sound wall.  
<sup>f</sup> An incremental increase of five dBA or more would result in a significant impact.

*Source: TAHA, 2008*

Haul/delivery trucks associated with construction activity would generate off-site noise. These trucks would either travel along Century Boulevard to the San Diego Freeway (Interstate-405) or Prairie Avenue to the Century Freeway (Interstate-105). Earthwork would be balanced on the project site and haul truck activity would be minimal. The precise number of heavy-duty trucks (e.g., delivery trucks) visiting the project on a daily basis was not known at the time of this analysis. However, doubling the heavy-duty

truck percentage used to obtain existing mobile noise levels would result in an incremental noise level increase of 1.7 dBA CNEL or less along all analyzed roadway segments. Construction-related heavy-duty truck noise levels attributed to the proposed project would not increase by three decibels (CNEL) to or within the “normally unacceptable” or “clearly unacceptable” category or result in a five-decibel or more increase in noise level. As such, construction-related heavy-duty truck noise would result in a less-than-significant impact on the ambient noise environment.

### *Vibration*

Construction-related vibration may damage buildings and result in annoyance. The proposed project would utilize heavy-duty construction equipment and caisson drilling equipment. The proposed project would not include pile driving. Table IV.G-11 shows vibration levels generated by various pieces of construction equipment. Regarding building damage, typical heavy equipment (e.g., a large bulldozer) generates vibration levels of 0.089 PPV at a distance of 25 feet. The nearest sensitive receptor would be at least 75 feet from construction activity. At this distance, typical construction equipment would generate vibration levels of approximately 0.04 inches per second PPV. This would be less than the building damage threshold of 0.5 inches per second PPV and, as such, construction-related vibration would result in a less-than-significant building damage impact.

**Table IV.G-11  
Vibration Velocities for Construction Equipment**

<b>Equipment</b>	<b>PPV at 25 Feet (Inches/Second)</b>	<b>RMS at 25 Feet (VdB)</b>
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

*SOURCE: Federal Transit Authority, Transit Noise and Vibration Impact Assessment, October 2005.*

The FTA vibration impact criteria for annoyance are shown in Table IV.G-3. Construction activity would occur during daytime hours and, as such, the Category 3 thresholds for daytime uses were utilized for the analysis. In addition, it was assumed that there would be between 30 and 70 vibration events per day of the same source. Based on these assumptions, a construction vibration annoyance impact would result if sensitive receptors would be exposed to vibration levels of 78 VdB RMS or greater. Typical heavy equipment (e.g., a vibratory roller) generates vibration levels of 87 VdB RMS at a distance of 25 feet. The nearest sensitive receptor would be at least 75 feet from construction activity. At this distance, typical construction equipment would generate vibration levels of approximately 77.5 VdB RMS. This vibration level would be less than the annoyance threshold of 78 VdB RMS and, as such, construction-related vibration would result in a less-than-significant annoyance impact.

Heavy-duty trucks associated with construction activity would potentially generate off-site vibration. It is unusual for on-road vehicles to generate perceptible vibration levels because rubber tires and suspension systems provide vibration isolation. When on-road vehicles cause effects such as window rattling the source is almost always airborne noise. Most problems associated with on-road vibration are directly related to a pothole, bump, expansion joint, or other discontinuity in the road surface. Assuming that the local roadways are in good condition, on-road heavy-duty truck travel would result in a less-than-significant impact.

## **Operational Phase Impacts**

### *Noise*

#### *Vehicle Noise*

The predominant noise source for the Proposed Project is vehicular traffic. According to the Revised Traffic Impact Study prepared by Linscott, Law, and Greenspan, Engineers the proposed project would generate 17,222 net new weekday daily vehicle trips and 25,508 net new weekend daily vehicle trips.<sup>8</sup>

To ascertain off-site noise impacts, traffic was modeled under future year (2014) no project and with project conditions utilizing FHWA RD-77-108 noise calculation formulas. Results of the weekday analysis are summarized in Table IV.G-12. As shown in the table, the proposed project would result in a slight reduction in noise levels along all but one analyzed segment; along Arbor Vitae Street between La Brea Avenue and Prairie Avenue, the proposed project would not change future noise levels. This reduction can be attributed to the removal of the existing racetrack, which currently attracts a daily average of 10,000 patrons. Accordingly, the proposed project would result in a beneficial impact on the ambient noise environment as it would slightly reduce noise levels in the project area.

Results of the weekend analysis are summarized in Table IV.G-13. As shown in the table, the proposed project would result in a slight increase (i.e., an increase of 0.8 dBA or less) in noise levels along six of the ten analyzed roadway segments, a slight reduction in noise levels along two of the analyzed segments and no change along the remaining two segments. Mobile noise levels attributed to the proposed project would not increase by three decibels (CNEL) to or within the “normally unacceptable” or “clearly unacceptable” category or result in a five-decibel or more increase in noise level. As such, the proposed project would result in a less-than-significant impact on the ambient noise environment.

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<sup>8</sup> Linscott, Law & Greenspan, Engineers, Revised Traffic Impact Study for the Hollywood Park Redevelopment Project, August 1, 2008.

**Table IV.G-12  
2006 and 2014 Estimated Community Noise Equivalent Level – Weekday <sup>a</sup>**

Roadway Segment	Estimated dBA, (CNEL)				
	Existing (2006)	No Project (2014)	Project (2014)	Project Impact	Cumulative Impact
Manchester Boulevard between Prairie Avenue and Crenshaw Boulevard	70.7	72.1	71.7	(0.4)	1.0
Pincay Drive between Prairie Avenue and Crenshaw Boulevard	69.6	71.4	71.0	(0.4)	1.4
Arbor Vitae Street between La Brea Avenue and Prairie Avenue	67.5	68.8	68.8	0.0	1.3
Century Boulevard between La Brea Avenue and Prairie Avenue	72.4	74.6	74.4	(0.2)	2.0
Century Boulevard between Prairie Avenue and Crenshaw Boulevard	72.9	75.7	75.4	(0.3)	2.5
Prairie Avenue between Manchester Boulevard and Century Boulevard	72.1	73.8	72.9	(0.7)	0.8
Prairie Avenue between Century Boulevard and Imperial Highway	72.4	74.5	73.6	(0.9)	1.2
Kareem Court between Manchester Boulevard and Pincay Drive	52.8	62.6	61.8	(0.8)	9.0
Crenshaw Boulevard between Manchester Boulevard and Century Boulevard	71.8	73.5	73.1	(0.4)	1.3
Crenshaw Boulevard between Century Boulevard and Imperial Highway	72.2	74.0	73.3	(0.7)	1.1

<sup>a</sup> The predicted CNEL were calculated as peak hour  $L_{eq}$  and converted into CNEL using the California Department of Transportation Technical Noise Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of ADT and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.  
Source: TAHA, 2008.

### *Mechanical Equipment Noise*

Potential stationary noise sources related to the long-term operations of the proposed project includes mechanical equipment. Mechanical equipment (e.g., HVAC equipment) typically generates noise levels of approximately 60 dBA at 50 feet. Mechanical equipment would potentially be located within 50 feet of the residences adjacent and to the northeast of the project site. As shown in Table IV.G-4, this location also had the lowest monitored ambient noise level. Adding mechanical equipment noise to the monitored ambient noise level of 61.2 dBA  $L_{eq}$  would result in a new ambient noise level of 63.7 dBA  $L_{eq}$ . This ambient noise level increase would be 2.5 dBA, which is less than the three dBA audibility threshold. In addition, mechanical equipment would generally be located within enclosures or behind new buildings or otherwise shielded from the nearby sensitive land uses. Proper engineering during the detailed design phases would ensure that the noise generated by mechanical equipment operations will meet Inglewood Municipal Code noise standards. As such, mechanical equipment would result a less-than-significant noise impact.

**Table IV.G-13  
2006 and 2014 Estimated Community Noise Equivalent Level – Weekend <sup>a</sup>**

Roadway Segment	Estimated dBA, (CNEL)				
	Existing (2006)	No Project (2014)	Project (2014)	Project Impact	Cumulative Impact
Manchester Boulevard between Prairie Avenue and Crenshaw Boulevard	70.0	71.5	71.5	0.0	1.5
Pincay Drive between Prairie Avenue and Crenshaw Boulevard	67.2	70.4	70.7	0.3	3.5
Arbor Vitae Street between La Brea Avenue and Prairie Avenue	66.2	68.1	68.0	(0.1)	1.8
Century Boulevard between La Brea Avenue and Prairie Avenue	72.0	74.8	75.3	0.5	3.3
Century Boulevard between Prairie Avenue and Crenshaw Boulevard	73.2	76.1	76.5	0.4	3.3
Prairie Avenue between Manchester Boulevard and Century Boulevard	72.1	73.5	73.3	(0.2)	1.2
Prairie Avenue between Century Boulevard and Imperial Highway	72.3	74.2	74.3	0.1	2.0
Kareem Court between Manchester Boulevard and Pincay Drive	53.3	63.6	63.6	0.0	10.3
Crenshaw Boulevard between Manchester Boulevard and Century Boulevard	72.8	74.2	74.5	0.3	1.7
Crenshaw Boulevard between Century Boulevard and Imperial Highway	73.1	74.0	74.8	0.8	1.7
<p><sup>a</sup> The predicted CNEL were calculated as peak hour <math>L_{eq}</math> and converted into CNEL using the California Department of Transportation Technical Noise Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of ADT and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.</p> <p>Source: TAHA, 2008.</p>					

### Parking Noise

Parking noise would result from proposed surface parking lots and parking structures. Surface lot parking activity along Prairie Avenue and Century Boulevard would potentially expose off-site sensitive receptors to unacceptable levels of noise. An automobile traveling at 25 miles per hour generates a noise level of approximately 60 dBA  $L_{eq}$ . As shown in Tables IV.G-12 and IV.G-13 mobile noise levels along Prairie Avenue and Century Boulevard would be approximately 73.0 and 75.4 dBA. When the parking noise level is added to the ambient noise level, the ambient noise level increase at sensitive receptors along Prairie Avenue and Century Boulevard would be less than one dBA and would not be audible. In addition, the majority of project parking would be located internal to the project site and away from sensitive receptors. As such, surface lot parking noise would result in a less-than-significant impact.

The proposed project proposes to include up to five parking structures located in the mixed-use area of the Project Site. For purposes of analyzing noise impacts, the proposed parking structures were assumed to be as large and as tall as possible to analyze the maximum impacts. Parking Structures 1, 3, 4, and 4a would be located along Century Boulevard. As shown in Table IV.G-4, the existing noise level along Century Boulevard is 74.7 dBA  $L_{eq}$ . The noise level generated by a parking structure is typically assumed to be approximately 63 dBA  $L_{eq}$  at 50 feet. This is derived by calculating the cumulative noise level generated by two automobiles passing a receptor at 25 miles per hour. When added to the existing

ambient noise level, Parking Structures 1, 3, 4, and 4a would increase ambient noise levels along Century Boulevard by approximately 0.3 dBA. This increase would not be audible at off-site sensitive receptors. Parking Structure 2 would be located along Prairie Avenue. The existing noise level along Prairie Avenue is 72.6 dBA  $L_{eq}$ . When added to the existing ambient noise level, Parking Structure 2 would increase the ambient noise level by approximately 0.5 dBA. This increase would not be audible at off-site sensitive receptors. Parking Structure 5 would be located along Hardy Street. The nearest off-site sensitive receptor would be located at least 150 feet to the east of the parking structure along Prairie Avenue. The existing noise level along Prairie Avenue is 72.6 dBA  $L_{eq}$ . When added to the existing ambient noise level, Parking Structure 2 would increase the ambient noise level by approximately 0.2 dBA. This increase would not be audible at off-site sensitive receptors. As such, parking structure noise would result in a less-than-significant impact to off-site sensitive receptors.

#### *Truck Noise*

The noise produced by delivery and trash pick-up trucks at the project site will also be a potential source of annoyance. The noise level associated with a trash or delivery truck would generally average approximately 88 dBA.<sup>9</sup> These sources of noise are typical in an urban environment. In addition, similar truck activity currently occurs within the project site and the surrounding neighborhoods. As such, truck noise would result in a less-than-significant impact.

#### *On-Site Noise Exposure*

New sensitive receptors located on the southern portion of project site would potentially be exposed to high noise levels from project-related commercial activity and recreational activity from the casino. Specifically, proposed residential units adjacent to the casino may be exposed to casino noise. In addition, proposed residential units that may abut the proposed retail uses along Century Boulevard would potentially experience increased noise from various retail noise sources (e.g., truck unloading, alarms from trucks in reverse, and parking activity). If the proposed retail uses are constructed such that the back walls abut the border with the proposed residential units, the retail buildings would shield the residential units from the majority of retail noise. However, if the retail land uses are constructed such that retail-related activity areas are in direct line-of-sight of residential units, retail noise would potentially result in unacceptable noise levels at residential units. Windows, exterior openings of buildings, and interior and exterior walls are assigned a fenestration rating in terms of sound transmission class (STC). The STC is a single-number rating of a material's or an assembly's ability to resist airborne sound transfer at the frequencies 125 to 4000 Hertz. In general, a higher STC rating blocks more noise from transmitting through a partition. Constructing new residential land uses with an insufficient STC rating would potentially result in unacceptable interior noise levels. Therefore, mitigation is proposed to reduce potentially significant retail and recreation-related noise.

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<sup>9</sup> E. Carr Everbach, *Noise Quantification and Monitoring: An Overview*, July, 26, 2001.

As shown in Figure IV.G-3, portions of the project site are within the 65 dBA CNEL noise contour for LAX. The portions of the project site located within the 65 dBA CNEL noise contour would potentially include residential and mixed-use land uses. As such, new sensitive land uses may potentially be exposed to interior noise levels that exceed the recommended 45 dBA CNEL. Therefore, mitigation is proposed to reduce potentially significant aircraft noise.

Parking Structures 1 and 2 would be surrounded by proposed retail land uses, which would serve as a noise barrier and, as such, would not increase ambient noise levels at on-site sensitive receptors. Parking Structures 3, 4, and 4b would be located approximately 50 feet south of proposed residential land uses. As discussed above, the noise level generated by the parking structure would be approximately 63 dBA  $L_{eq}$ . Typical building construction provides a noise reduction of approximately 26 dBA with closed windows.<sup>10</sup> As such, interior noise levels at the nearest proposed residential land use as a result of Parking Structure 3, 4, and 4b activity would be approximately 37 dBA. This noise level is less than the 45 dBA interior noise significance threshold. As such, parking structure noise would result in a less-than-significant impact.

### ***Vibration***

The proposed project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, similar to existing conditions, traffic-related vibration levels would not be perceptible by sensitive receptors. Thus, operational vibration would result in a less-than-significant impact.

### **Land Use Equivalency Program Impacts**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's Conceptual Circulation Plan or general layout. Potential changes in land use under the Equivalency Program would therefore have no substantial effect because only the use is changing. As a result, the amount and types of construction equipment operating at the Project site under peak construction activity levels would be the same for the Equivalency Program compared to the Proposed Project, although there may be minor differences in the overall duration of construction activities due to the limited changes in the amount of development that could occur. Furthermore, the site characterization and associated remediation required for Project development would be the same under the Equivalency Program. As such, the impacts of the Equivalency Program relative to construction noise

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<sup>10</sup> *American Society for Testing of Materials, Standard Classification for Determination of Outdoor-Indoor Transmission Class, 2003.*



levels would be the same as those forecasted for the Proposed Project. Therefore, the Equivalency Program, as is the case with the Proposed Project, would result in significant and unavoidable impacts with regard to the construction phase.

Off-site mobile noise levels during operations under the Equivalency Program would be comparable to those of the Proposed Project as the trip generation and trip distribution characteristics of the Equivalency Program and the Proposed Project would also be comparable. On-site noise sources (e.g., parking activity and mechanical equipment) under the Equivalency Program would also be similar to the Proposed Project as there would be no substantial variation in the general layout. Concurrent construction and operations noise levels under the Equivalency Program would also be comparable to the Proposed Project as levels of construction activity and traffic would also be comparable.

All recommended mitigation measures to minimize noise impacts under the Proposed Project would be implemented, as appropriate, under the Equivalency Program.

## **PROJECT DESIGN FEATURES**

No specific PDFs have been proposed with respect to noise impacts.

## **MITIGATION MEASURES**

### **Construction Phase**

- MM G-1. All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.
- MM G-2. As feasible, grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).
- MM G-3. As feasible, equipment staging areas shall be located away from sensitive receptors.
- MM G-4. A perimeter wall is already present between the project site and the residential development to the east (Renaissance). The Project Applicant shall not remove this wall.
- MM G-5. All residential units located within 500 feet of the construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet, shall also be posted at high visibility areas on the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as a telephone number where residents can inquire about the construction process and register complaints.

MM G-6. A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and use reasonable measures to mitigate the problem, if feasible. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.

### **Operational Phase**

MM G-7. All residential units shall be designed to minimize noise effects from non-residential activities on the project site, including the casino, parking areas, loading zones, alarms from trucks in reverse, and commercial uses with exterior components (e.g., outdoor dining, special entertainment events, etc.). These design measures shall be established to maintain noise levels at interior spaces to be within the 45 dBA noise standards. Measures shall include, but not be limited to, using construction techniques/materials with an STC rating of 40 in habitable rooms/areas, the use of perimeter walls, sound-rated interior walls between uses, or other site planning and building placement that could reduce or eliminate the light-of-sight between the noise source and residential units.

See Mitigation Measure I-1 in Section IV.I Land Use for an additional mitigation measure related to airport noise impacts.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

### **Construction Phase Noise Impacts**

With respect to threshold questions (a) and (d), the Proposed Project would expose sensitive receptors to increased construction noise levels. Mitigation Measure G-1 would reduce construction noise levels by approximately five dBA. Mitigation Measure G-7 would allow for noise complaints to be addressed and the other mitigation measures (G-2 through G-6) would assist in attenuating construction noise levels. As shown in Table IV.G-14, even with mitigation, construction noise levels would exceed the five dBA significance threshold at sensitive receptors near the project site. As such, construction activity would result in a significant and unavoidable short-term construction noise impact.

Note that earth movement activity would raise the elevation of the project site by 13 feet. It would not be possible to install a temporary noise barrier during the site preparation phase of construction activity because the noise barrier would constantly need to be broken down and rebuilt as height was added to the grade.

With respect to threshold question (b), construction activity would not expose sensitive receptors to excessive vibration levels.

**Table IV.G-14  
Construction Noise Levels - Mitigated**

<b>Nearest Sensitive Receptors</b>	<b>Distance (feet) <sup>a</sup></b>	<b>Maximum Construction Noise Level (dBA) <sup>b</sup></b>	<b>Existing Ambient (dBA, L<sub>eq</sub>) <sup>c</sup></b>	<b>New Ambient (dBA, L<sub>eq</sub>) <sup>d</sup></b>	<b>Increase (dBA, L<sub>eq</sub>) <sup>f,g</sup></b>
Residences Northeast of the Project Site	Adjacent	79	61.2	79.1	17.9
Residences East of the Project Site <sup>e</sup>	Adjacent	84	66.7	84.1	17.4
Residences West of the Project Site	75	81	72.6	81.6	9.0
Residences South of the Project Site	75	81	74.7	81.9	7.2
Inglewood Junior Academy	75	81	72.6	81.6	9.0
William H. Kelso Elementary School	125	76	72.6	77.6	5.0
Residences North of the Project Site	500	64	73.1	73.6	0.5
<sup>b</sup> Distance of noise source from receptor. <sup>c</sup> Construction noise source's sound level at receptor location, with distance adjustment. <sup>d</sup> Pre-construction activity ambient sound level at receptor location. <sup>e</sup> New sound level at receptor location during the construction period, including noise from construction activity. <sup>f</sup> Includes a five dBA reduction for an existing sound wall. <sup>g</sup> An incremental increase of five dBA or more would result in a significant impact. Source: TAHA, 2008.					

### Operational Phase

With respect to threshold questions (a), (c), (e), and (f), Mitigation Measures G-7 and I-1 (in Section IV.I Land Use) would ensure that new sensitive receptors would not be exposed to on-site noise and excessive aircraft noise levels. As such, project operations would result in a less-than-significant noise impact.

With respect to threshold question (b), operational activity would not expose sensitive receptors to excessive vibration levels.

### CUMULATIVE IMPACTS

When calculating future traffic impacts, the traffic consultant took 85 additional projects into consideration. Thus, the future traffic results without and with the proposed project already account for the cumulative impacts from these other projects. Since the noise impacts are generated directly from the traffic analysis results, the future without project and future with project noise impacts described in this report already reflect cumulative impacts.

Tables IV.G-12 and IV.G-13 present the cumulative increase in future traffic noise levels at various roadway segments (i.e., 2014 "No Project" conditions plus proposed project traffic) for the weekday and weekend conditions, respectively. Results of the weekday cumulative analysis are summarized in Table IV.G-12. As shown in the table, the proposed project, including the Equivalency Program, and related

projects would result in mobile noise increases between 0.8 dBA and 2.5 dBA along nine of the ten analyzed roadway segments; mobile noise levels attributed to the proposed project and related projects along these roadway segments would not increase by three decibels (CNEL) to or within the “normally unacceptable” or “clearly unacceptable” category or result in a five-decibel or more increase in noise level. As such, weekday project-related mobile noise along these nine roadway segments would contribute to a less-than-significant cumulative impact on the ambient noise environment. However, mobile noise level along Kareem Court between Manchester Boulevard and Pincay Drive would increase by 9.0 dBA CNEL over existing conditions, which is greater than the five dBA CNEL or more significance threshold. This increase is solely attributed to traffic generated by the related projects in the project vicinity since the proposed project would actually result in a noise reduction along this roadway segment (Table IV.G-11). Therefore, weekday project-related mobile noise would not contribute to a cumulatively considerable impact on the ambient noise environment.

Results of the weekend cumulative analysis are summarized in Table IV.G-13. As shown in the table, including the Equivalency Program, the proposed project and related projects would result in mobile noise increases between 1.2 dBA and 2.0 dBA along six of the ten analyzed roadway segments. As such, weekend project-related mobile noise along these six roadway segments would contribute to a less-than-significant cumulative impact on the ambient noise environment. However, along Pincay Drive between Prairie Avenue and Crenshaw Boulevard, Century Boulevard between La Brea Avenue (Hawthorne Boulevard south of Century Boulevard) and Prairie Avenue, and Century Boulevard between Prairie Avenue and Crenshaw Boulevard, the proposed project, including the Equivalency Program, and related projects would result in a mobile noise increases between 3.3 dBA and 3.5 dBA. These increases would exceed the three dBA CNEL significance threshold within the “normally unacceptable” category (Table IV.G-7). In addition, mobile noise level along Kareem Court would increase by 10.3 dBA CNEL over existing conditions, which is greater than the five dBA CNEL or more significance threshold. These increases are solely attributed to traffic generated by the related projects in the project vicinity since the proposed project would not contribute to any increase along this roadway segment (Table IV.G-12). Therefore, weekend project-related mobile noise would not contribute to a cumulatively considerable impact on the ambient noise environment.

The predominant vibration source near the project site is heavy trucks traveling on the local roadways. Neither the project, including the Equivalency Program, nor related projects would substantially increase heavy-duty vehicle traffic near the project site and or cause a substantial increase in heavy-duty trucks on local roadways. As such, the proposed project would not add to a cumulatively considerable vibration impact.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### H. POPULATION, HOUSING & EMPLOYMENT

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#### 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.<sup>1</sup> 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.<sup>2</sup> 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

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<sup>1</sup> SCAG Regional Transportation Plan (RTP) Growth Forecast 2008.

<sup>2</sup> 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%).<sup>3</sup> 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.<sup>4</sup> 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

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

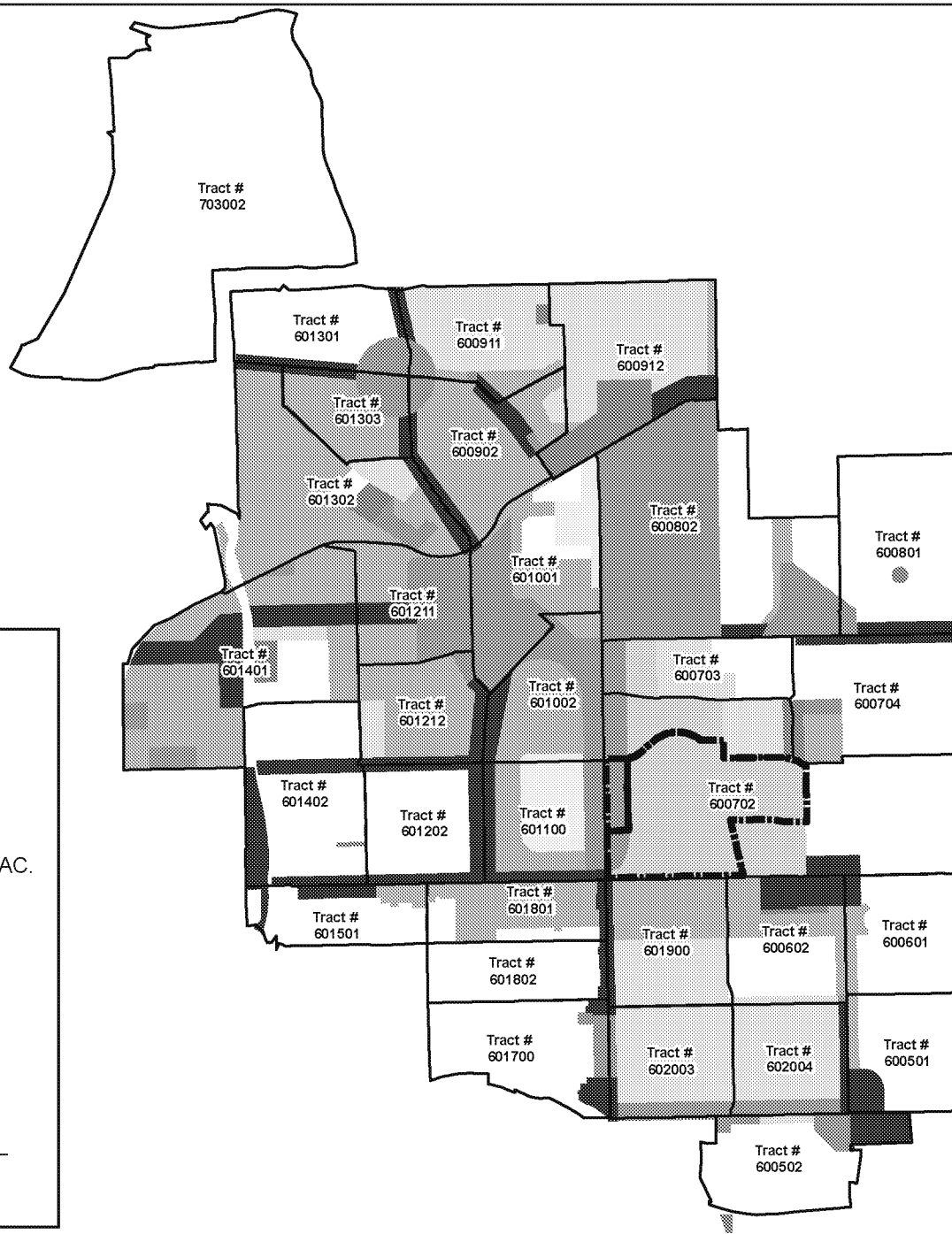
<sup>4</sup> *Hollywood Park Land Company, June 2007.*

**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
<b>600703</b>	<b>CR, R1, R3</b>	<b>LD, LMD, C/Rec, C/Res</b>	1,935	944	2.04	1,948	956	2.03	1,982	985	2.01	1,992	1,002	1.92
<b>600704</b>	<b>R1, C2, OS, R3, R-1.5, C3</b>	<b>LD, LMD, C, OS, P/SP</b>	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, MIL, 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
<b>Lennox Tracts/Outside City Boundaries <sup>a</sup></b>														
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
<b>City Total</b>			<b>117,789</b>	<b>36,806</b>	<b>3.38</b>	<b>118,466</b>	<b>37,205</b>	<b>3.36</b>	<b>120,185</b>	<b>38,149</b>	<b>3.32</b>	<b>120,678</b>	<b>38,708</b>	<b>3.28</b>
<p><i>Notes:</i>  <sup>a</sup> 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.</p>														













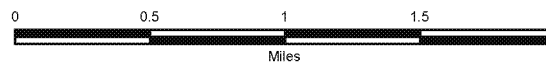


**Legend**

-  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.<sup>5</sup>

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<sup>5</sup> 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.<sup>6</sup> 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.<sup>7</sup>

#### 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, 102<sup>nd</sup> 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.<sup>8</sup>

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<sup>6</sup> *Ibid.*

<sup>7</sup> 2000 Housing Element, City of Inglewood, pp. 9-13.

<sup>8</sup> 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.<sup>9</sup> Table IV.H-2 provides the projected housing needs by income level within the City of Inglewood.

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<sup>9</sup> 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](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**

<b>Income Category</b>	<b>Housing Unit Construction Need (Adopted 7/13/07)</b>
<b>Very Low Income</b>	<b>398 (24%)</b>
<b>Low Income</b>	<b>255 (15.4%)</b>
<b>Moderate Income</b>	<b>278 (16.8%)</b>
<b>Above Moderate Income</b>	<b>727 (43.8%)</b>
<b>Total</b>	<b>1,658 (100%)</b>
<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.<sup>10</sup>

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

<sup>10</sup> SCAG RCPG Growth Management Chapter, website: <http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGGrowthManagementChapter.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.<sup>11</sup>

### **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.<sup>12</sup>

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.

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<sup>11</sup> SCAG RCPG Housing Chapter, website: [http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPG\\_HousingChapter.pdf](http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPG_HousingChapter.pdf), accessed July 27, 2006.

<sup>12</sup> 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,<sup>13</sup> 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.<sup>14</sup>

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.<sup>15</sup> Construction industry jobs generally have no regular place of business. Rather, construction workers commute to job sites

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<sup>13</sup> *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.*

<sup>14</sup> *Hamilton, Rabinovitz & Alshuler, Inc., April 18, 2007.*

<sup>15</sup> *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 Environment<sup>16</sup>

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.

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<sup>16</sup> 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
<b>Average Daily Handle (1):</b>						
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%	
<b>Average Daily Attendance (2):</b>						
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%
<b>Average combined attendance</b>	<b>4,007</b>	<b>3,717</b>	<b>3,573</b>	<b>3,238</b>	<b>2,940</b>	<b>-26.62%</b>
<b>Percentage change</b>	<b>-</b>	<b>-7.24%</b>	<b>-3.88%</b>	<b>-9.37%</b>	<b>-9.19%</b>	

*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 <sup>a</sup>	Current Occupancy <sup>b</sup>
Hollywood Park	1,950	1,850
Del Mar <sup>c</sup>	2,100	0
Santa Anita	1,950	1,500
Fairplex	1,300	500
San Louis Rey Downs	500	450
<b>TOTAL</b>	<b>7,800</b>	<b>4,300</b>
<i>Notes</i>		
<sup>a</sup> Information gathered from California Horse Racing Board racing applications.		
<sup>b</sup> Provided by Nancy Uri, Stall Superintendent of Hollywood Park.		
<sup>c</sup> 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**

<b>Land Use</b>	<b>Full Time</b>	<b>[Seasonal/ Part Time] FTE<sup>a</sup></b>	<b>Total (Full Time +FTE)</b>
<b>Existing Uses<sup>b</sup></b>			
<b>Hollywood Park Racetrack</b>			
Racing Association Related Employees	374	[522] 193	567
Casual Laborers	885	[404] 149	1,034
<b>Subtotal Hollywood Park Racetrack</b>	<b>1,259</b>	<b>[926] 342</b>	<b>1,601</b>
<b>Hollywood Park Casino</b>	--	--	1,017
<b>Subtotal Existing Jobs</b>			<b>2,618</b>
<b>Proposed Project</b>			
<b>Land Use</b>	<b>Size</b>	<b>Generation Rate<sup>c</sup></b>	<b>Total</b>
<b>Residential<sup>d</sup></b>	2,995 du	0.13/du <sup>e</sup>	389
<b>Retail</b>	620,000 sf	1.87/1,000 sf	1,159
<b>Commercial/Office</b>	75,000 sf	3.51/1,000 sf	263
<b>Casino<sup>f</sup></b>	--	--	1,017
<b>Hotel (300 rooms)<sup>g</sup></b>	210,000 sf	1.13/1,000 sf	237
<b>Meeting Space</b>	20,000 sf	3.51/1,000 sf	70
<b>Subtotal Proposed Employment Generation</b>			<b>3,135</b>
<b>Net Total (Proposed less Existing)</b>			<b>+517</b>
<b>Notes:</b>			
<sup>a</sup> 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.			
<sup>b</sup> Existing employment data provided by Hollywood Park Racing Association.			
<sup>c</sup> City of Inglewood 2006 Developer Fee Justification Study and School Facilities Fees Needs Analysis.			
<sup>d</sup> The residential land use includes a 10,000 square foot HOA Recreational Facility.			
<sup>e</sup> Residential Job Generation Study, RRC Associates and the Housing Collaborative (December 2000).			
<sup>f</sup> The estimated number of future casino employees was provided by the Hollywood Park Land Company.			
<sup>g</sup> 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.<sup>17</sup> Likewise, these 330 Racing Association Related Seasonal/Part Time jobs could move to other venues when the Hollywood Park facility

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<sup>17</sup> *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.<sup>18</sup> 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

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<sup>18</sup> 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.<sup>19</sup> 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) <sup>a</sup>	2015 Forecast <sup>b</sup>	Existing Plus Project <sup>c</sup>	Over/Under Projections
<b>Housing</b>				
SCAG Forecasts for the Inglewood Subregion	38,969	38,149	41,964	3,815
<b>Population</b>				
SCAG Forecasts for the Inglewood Subregion	118,878	120,185	127,863	7,678
<sup>a</sup> 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. <sup>b</sup> Based on SCAG's RTP, 2008. <sup>c</sup> 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.

<sup>19</sup> 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.<sup>20</sup> 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

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<sup>20</sup> 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,<sup>21</sup> 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

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<sup>21</sup> *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><b>1. Improve mobility for all residents.</b></p> <ul style="list-style-type: none"> <li>Encourage transportation investments and land use decisions that are mutually supportive.</li> </ul>	<p><b>Consistent:</b> 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>
<ul style="list-style-type: none"> <li>Locate new housing near existing jobs and new jobs near new housing.</li> </ul>	<p><b>Consistent:</b> 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"> <li>• Encourage Transit Oriented Development.</li> </ul>	<p><b>Consistent:</b> 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"> <li>• Promote a variety of transit choices.</li> </ul>	<p><b>Consistent:</b> 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>
<b>2. Foster livability in all communities.</b>	
<ul style="list-style-type: none"> <li>• Promote infill development and redevelopment to revitalize existing communities.</li> </ul>	<p><b>Consistent:</b> 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"> <li>• Promote development plans that provide a mix of uses.</li> </ul>	<p><b>Consistent:</b> 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"> <li>• Promote “people-scaled,” pedestrian friendly communities.</li> </ul>	<p><b>Consistent:</b> 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"> <li>• Support the preservation of stable, single family neighborhoods.</li> </ul>	<p><b>Consistent:</b> 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.
<b>3. Enable prosperity for all people.</b>	
<ul style="list-style-type: none"> <li>• Provide a variety of housing types in each community to meet the housing needs of all income levels.</li> </ul>	<p><b>Consistent:</b> 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).</p>
<ul style="list-style-type: none"> <li>• Support educational opportunities that promote balanced growth.</li> </ul>	<p><b>Consistent:</b> 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.</p>
<ul style="list-style-type: none"> <li>• Ensure environmental justice regardless of race, ethnicity or income classes.</li> </ul>	<p><b>Consistent:</b> 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.</p>
<ul style="list-style-type: none"> <li>• Support local and state fiscal policies that encourage balanced growth.</li> </ul>	<p><b>Consistent:</b> 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.</p>
<ul style="list-style-type: none"> <li>• Encourage civic engagement.</li> </ul>	<p><b>Consistent:</b> 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.</p>
<b>4. Promote sustainability for future generations.</b>	
<ul style="list-style-type: none"> <li>• Preserve rural, agricultural, recreational and environmentally sensitive areas.</li> </ul>	<p><b>Consistent:</b> 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.</p>
<ul style="list-style-type: none"> <li>• Focus development in urban centers and existing facilities.</li> </ul>	<p><b>Consistent:</b> The Proposed Project would redevelop an existing land use that is currently adequately supported by utility and service infrastructure. Increased demands</p>

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"> <li>• Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce solid waste.</li> </ul>	<p><b>Consistent:</b> 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"> <li>• Utilize "green" development techniques.</li> </ul>	<p><b>Consistent:</b> 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>  <sup>a</sup> 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 &amp; 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.



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## *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.<sup>22</sup> 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

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<sup>22</sup> 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
<b>Proposed Project</b>			<b>8,985</b>		<b>8,985</b>		<b>8,985</b>		<b>8,985</b>		<b>8,985</b>		<b>8,985</b>
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
<b>Total</b>			<b>1,972</b>		<b>1,963</b>		<b>2,004</b>		<b>2,048</b>		<b>2,312</b>		<b>2,106</b>
<b>Proposed Project</b>			<b>2,120</b>		<b>2,120</b>		<b>2,120</b>		<b>2,120</b>		<b>2,120</b>		<b>2,120</b>
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
<b>Net Total</b>			<b>371</b>		<b>362</b>		<b>403</b>		<b>447</b>		<b>711</b>		<b>505</b>

Notes:

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

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### I. LAND USE PLANNING

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#### ENVIRONMENTAL SETTING

##### Existing Land Uses

The approximate 238-acre Project Site is located at 1050 South Prairie Avenue in Inglewood, California. The Project Site is generally bounded by Prairie Avenue on the west, a vacant commercial property, residential development and Darby Park to the north, residential development to the east, and a commercial shopping center and Century Boulevard to the south (see Figure II-1, Regional and Project Vicinity Map, in Section II, Project Description).

The Project Site is currently developed with the Hollywood Park Turf Club (including the Hollywood Park Racetrack and grandstand), Casino, and adjacent surface parking areas. Photographs depicting land uses on the Project Site and immediately surrounding area are provided in Section IV.A, Aesthetics.

##### Surrounding Land Uses

The Project Site is located in a developed area which is supported by existing urban infrastructure. The surrounding area is comprised of a mix of low- to medium-density residential, commercial, and office uses. The properties immediately surrounding the Project Site are described as follows: on the north side of the Project Site is a vacant lot and the Renaissance Residential development; to the northeast of the Project Site is Darby Park (3400 West Arbor Vitae Street); to the east are single family residential uses and the Home Depot commercial shopping center; to the south (across Century Boulevard) is a commercial shopping center (the Village at Century Boulevard) and other commercial uses; and to the west (across Prairie Avenue) are several single-story retail/commercial and multi-family residential uses. (See Figure II-2, Aerial Photograph of the Project Area in Section II, Project Description.)

##### Relevant Land Use Policies

The Project Site is located within the jurisdiction of several local and regional planning agencies. At the regional level, the Project Site is located within the planning area of the Southern California Association of Governments (SCAG), the region's federally-designated metropolitan planning organization. The Proposed Project is also located within the South Coast Air Basin (SCAB) and therefore is within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As such, the Project Site is subject to SCAQMD's Air Quality Management Plan (AQMP). The Project Site is within the jurisdiction of the Regional Water Quality Control Board (RWQCB). In addition, the Project Site is subject to the Congestion Management Plan (CMP) for Los Angeles County.

At the local level, development of the Project Site is guided by the City of Inglewood General Plan (General Plan), which provides general guidelines on land use issues and planning policy for the entire City. The Project Site also falls 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 Redevelopment Project Area”)— the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area. The Redevelopment Plan is administered by the Inglewood Redevelopment Agency (Agency). All development activity on-site is subject to the applicable land use regulations of the Inglewood General Plan, the Redevelopment Plan for the Merged Redevelopment Project Area, and the City of Inglewood Zoning Code (Chapter 12 of the Inglewood Municipal Code), and other applicable sections of the City of Inglewood Municipal Code (IMC).

### ***Regional Plans***

#### *Regional Comprehensive Plan and Guide*

The Project Site is also located within the six-county region that comprises the SCAG planning area. The City of Inglewood is located within the South Bay Cities Council of Governments (SBCCOG) subregion. SCAG’s Regional Comprehensive Plan and Guide (RCPG), adopted in 1994, serves as a policy document that sets broad goals for the Southern California region and identifies strategies for agencies at all levels of government to use in guiding their decision-making with respect to the significant issues and changes, including growth management, that can be anticipated by the year 2015 and beyond.

Adopted RCPG policies related to land use are contained primarily in Chapter 3 of the RCPG, entitled “Growth Management.” The purpose of the Growth Management chapter is to present forecasts that establish the socio-economic parameters for the development of the Regional Mobility and Air Quality Chapters of the RCPG, and to address issues related to growth and land consumption by encouraging local land use actions which could ultimately lead to the development of an urban form that would help minimize development costs, save natural resources, and enhance the quality of life in the region. Impacts associated with air quality and regional mobility are discussed in Sections IV.B (Air Quality) and IV.L (Transportation and Traffic), respectively.

Specific Growth Management Chapter policies are divided into four main categories: (1) growth forecasts; (2) improving the regional standard of living; (3) maintaining the regional quality of life; and (4) providing social, political and cultural equity. Growth Management policies that are pertinent to the Proposed Project are discussed under the “Project Impacts” subheading below.

#### *Growth Vision*

SCAG’s Compass Growth Vision, 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 incorporates a 2% Growth Strategy that will 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.
- Creating mini-communities around transit stations, with small businesses, urban housing and restaurants all within an easy walk.

#### *South Coast Air Quality Management District*

The Proposed Project is located within the South Coast Air Basin (SCAB) and is therefore within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. The most recent AQMP was adopted by the Governing Board of the SCAQMD on June 1, 2007. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. Air quality impacts and consistency of the Project with the AQMP are analyzed in greater detail in Section IV.B (Air Quality) of this Draft EIR.

#### *Regional Water Quality Control Board*

The Project Site is within the jurisdiction of the Regional Water Quality Control Board (RWQCB). The RWQCB authorizes National Pollutant Discharge Elimination System (NPDES) permits that ensures compliance with wastewater treatment and discharge requirements. The Los Angeles Regional Water Quality Control Board (LARWQCB) enforces wastewater treatment and discharge requirements for properties in the project area. Water quality impacts by the Proposed Project and consistency of the Project with the RWQCB is analyzed in greater detail in Section IV.F (Hydrology/Water Quality) of this Draft EIR.

#### *Congestion Management Plan*

Within Los Angeles County, the Metropolitan Transportation Authority (MTA) is the designated congestion management agency responsible for coordinating regional transportation policies. The Congestion Management Plan (CMP) for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation and air quality decisions. Further, the program seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel and to propose transportation projects which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements), cities, counties, and other eligible agencies must implement the requirements of the CMP. The Proposed Project's Traffic Impact Analysis, which is presented in greater detail in Section IV.L (Transportation and Traffic) of this Draft EIR and included as Technical Appendix G-1, was prepared in accordance with the County of Los Angeles CMP and City of Inglewood Department of Transportation (IDOT) Guidelines.



*Airport Land Use Commission (ALUC)*

The Project Site is located within 2 statute miles of two public airports; the Los Angeles International Airport (LAX), located approximately 2 miles to the west of the Project Site, and the Hawthorne Municipal Airport, located approximately 2 miles south of the Project Site.

Under Public Utilities Code Section 21670 et seq., each county 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). The ALUC's purpose is to coordinate planning for the area around public use airports to protect the public health, safety and welfare from land uses that do not minimize the public's exposure to excessive noise and safety hazards.<sup>1</sup> To that end, the ALUC has the power to prepare and adopt an airport land use compatibility plan, known as the Comprehensive Land Use Plan (the "CLUP"), and to review plans, regulations, or actions by a local government to ensure compatibility with the CLUP. To implement this plan, the ALUC has established provisions for safety, noise insulation, and the regulation of building height within areas adjacent to the airports. However, the authority of the ALUC is limited. The ALUC has no jurisdiction over existing land uses. Also, it does not have jurisdiction over airport operations, nor can it enact zoning requirements in cities. Instead, the ALUC sets uniform standards to "prohibit development of incompatible uses, but it is the responsibility of the cities and the County, through their planning and zoning powers, to specify which compatible uses are appropriate within their jurisdictions."<sup>2</sup>

Under Public Utilities Code Section 21676, prior to the amendment of a general plan or specific plan, the local agency must first refer the proposed action to the ALUC if the project is within the ALUC Planning Boundaries. The ALUC will determine whether the project is consistent with the CLUP. If the ALUC finds the project inconsistent with the CLUP, after a public hearing, the local government or agency may propose to overrule the ALUC by a two-thirds vote of its governing body if it makes specific findings that the proposed action is consistent with the purposes of the relevant statute, namely Public Utilities Code Section 21670 et seq.<sup>3</sup>

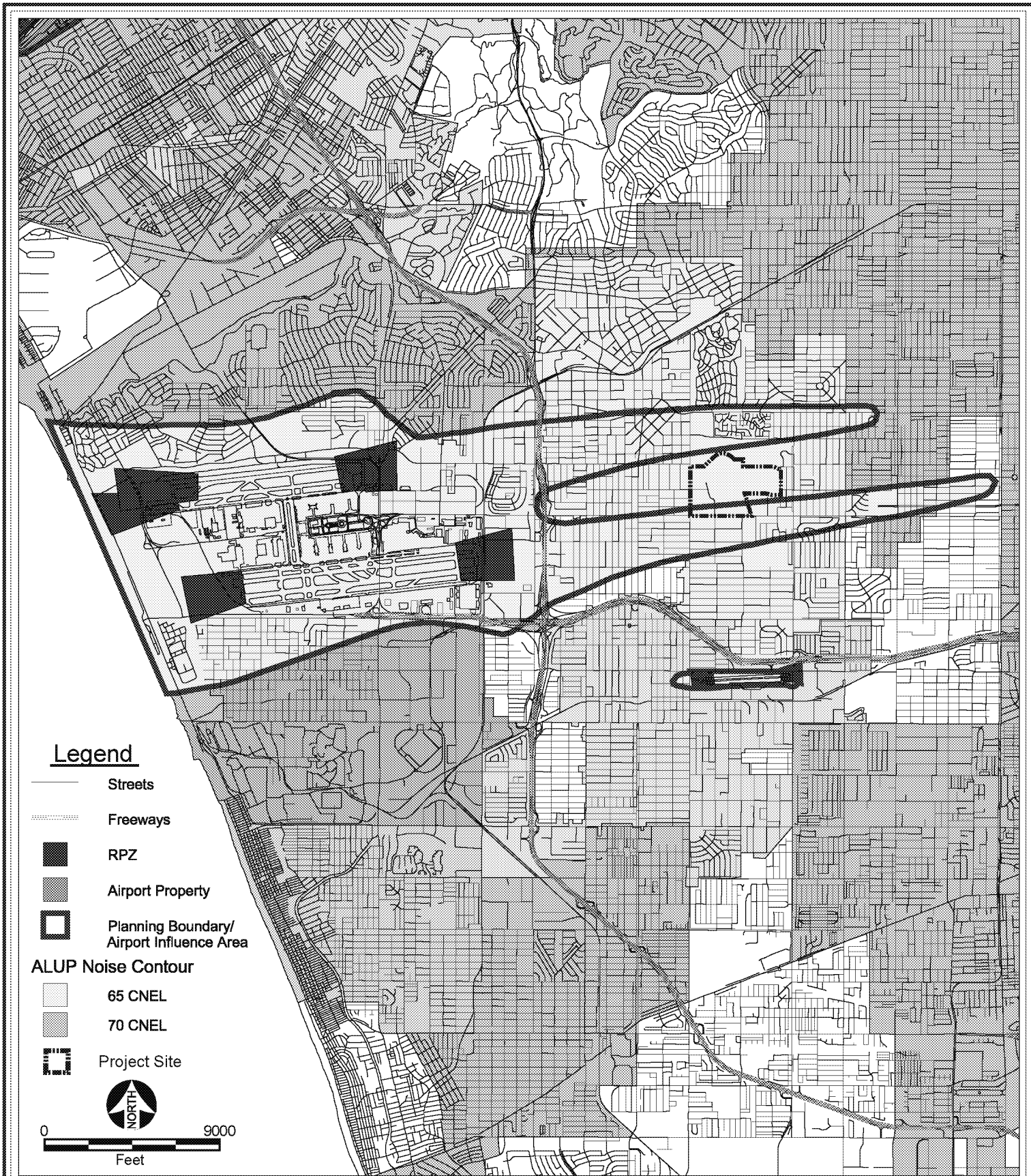
The Project Site is partially within the Planning Boundary/Airport Influence Area for the LAX airport as designated by the Los Angeles County Airport Land Use Plan. As a result, a portion of the proposed development falls within the jurisdiction and authority of the ALUC. As depicted in Figure IV.I-1, the area of the Project Site that falls within the Airport Influence Area for LAX is limited to the southern

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<sup>1</sup> *Cal. Pub. Util. Code § 21670(a)(2).*

<sup>2</sup> *Los Angeles County Airport Land Use Plan (prepared by the Department of Regional Planning), p. 2.*

<sup>3</sup> *California Public Utilities Code Section § 21676(b).*



Source: Los Angeles County Airport Land Use Commission, 5/13/03.

portion of the site along Century Boulevard. As shown in Figure IV.I-2, the Proposed Project is not located within the designated Airport Influence Area for the Hawthorne Municipal Airport.

*Assembly Bill 2776 Aviation Noise: Real Estate Disclosure*

AB 2776 requires disclosure that an airport is in the vicinity of residential property under three circumstances: (1) when a new subdivision is created (Business and Professions Code § 11010(a); (2) when a new common-interest development such as a condominium is created (Civil Code § 1353); and (3) when a “natural hazard disclosure statement” is prepared in connection with the transfer of property (Civil Code § 1103.4). Pursuant to Section 11010 of the Business and Professions Code, any person who intends to offer subdivided lands within California for sale or lease is required to file with the Department of Real Estate an application for a public report consisting of a notice of intention and a completed questionnaire that includes, among other things, the location of all existing airports, and of all proposed airports shown on the general plan of any city or county, located within 2 statute miles of the subdivision. Likewise, sellers of common interest developments and sellers of specified residential properties are also required to make disclosures regarding airport vicinity upon the transfer of that property in a declaration or in a Natural Hazard Disclosure Statement. (Civil Code Sections 1353 and 1103.4.) With respect to properties located within an airport influence area, AB 2776 (Sections 11010 of the Business and Professions Code and Sections 1353 and 1103.4 of the Civil Code) requires that the following statement be included in the specified situations:

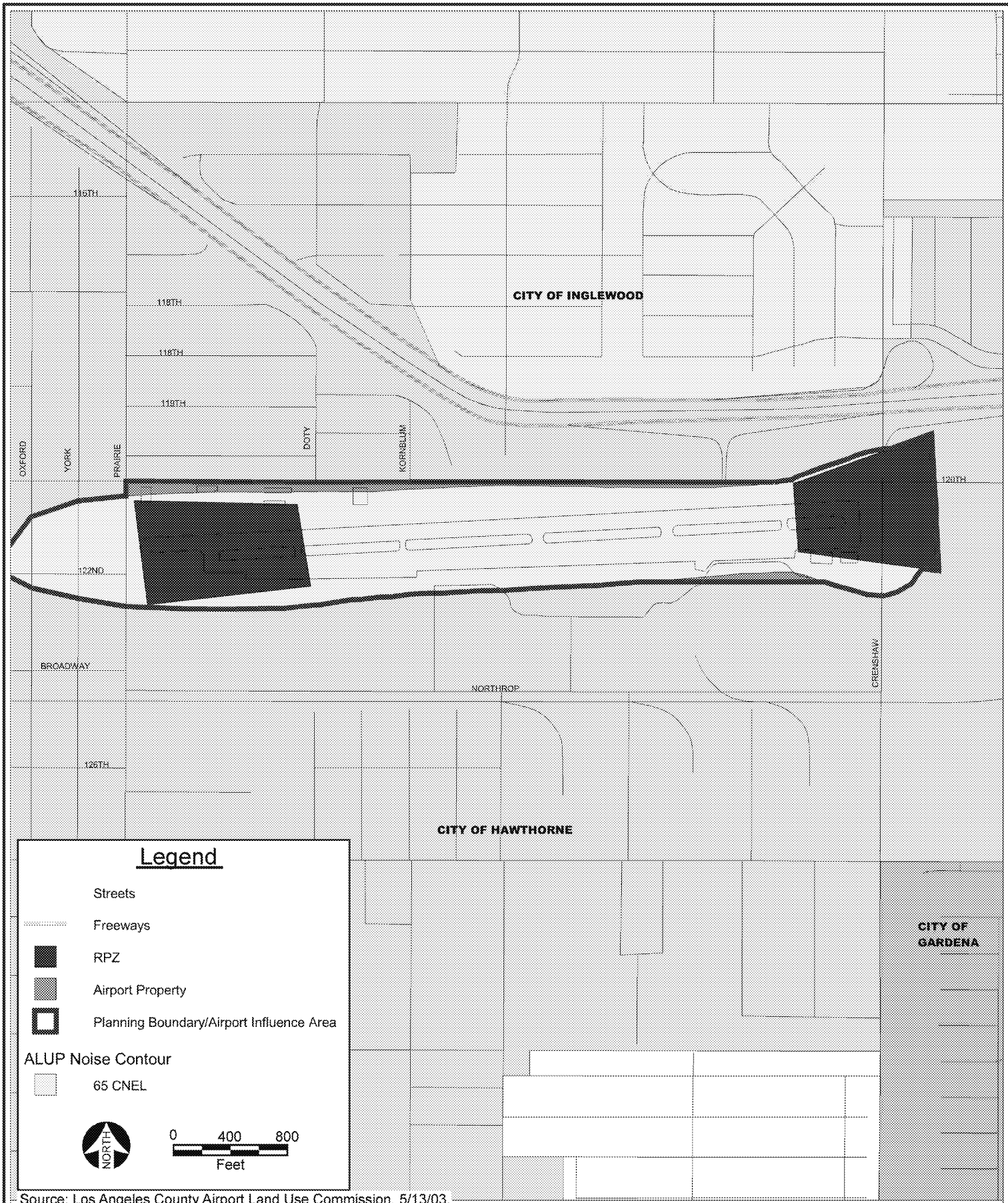
“NOTICE OF AIRPORT IN VICINITY

*This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you.”*

**Local Plans**

*City of Inglewood General Plan*

California State law (Government Code Section 65300) requires that each City prepare and adopt a comprehensive, long-term general plan for its future development. This general plan must contain seven elements, including land use, circulation, housing, conservation, open space, noise and safety. In addition to these, State law permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions. California State law also requires that the day-to-day decisions of a City follow logically from and be consistent with the general plan. More specifically, Government Code Sections 65860, 66473.5 and 65647.4 require that zoning ordinances and subdivision and parcel map approvals be consistent with the general plan.



The current City of Inglewood General Plan was adopted in January 1980. It sets forth goals and policies for the future development of the City and designates the location of desired future land uses within the City. The General Plan Land Use designation for the Project Site is Commercial/Residential and Commercial/Recreational. Figure IV.I-3, City of Inglewood General Plan Land Use Designations, depicts the existing General Plan designations for the Project Site.

It should be noted that the City of Inglewood General Plan is currently in the process of being updated by the Planning Division. Six of the seven elements were adopted in the 1980s and 1990s and have not been updated since that time. Community meetings are currently being held. However, at this time a Notice of Preparation (NOP) for the General Plan Update EIR has not yet been published.

### Land Use Element

The Inglewood Land Use Element presents a long-range plan for the distribution and future use of land within the City of Inglewood. The Land Use Element analyzes population, existing and future land use requirements, and proposes implementation techniques. It provides a framework upon which the development of public and privately owned land can be based. The general goals and objectives of the City of Inglewood's Land Use Element are as follows:

- 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;
- Help promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions;
- Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs;
- Develop a land use element that facilitates the efficient use of land for conservation, development and redevelopment; and
- Promote Inglewood's image and identity as an independent community within the Los Angeles Metropolitan area.

As discussed above and shown in Figure IV.I-3, the Project Site is designated for "Commercial/Residential" and "Commercial/Recreational" land uses in the General Plan. The goals and objectives for the commercial land use designation as identified in the Land Use Element are as follows:











- Create and maintain a healthy economic condition within the present business community and assist new businesses to relocate within the City;

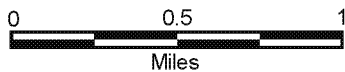


Legend

 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



- Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown;
- Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood's major streets;
- Encourage the continued development and promotion of existing commercial centers such as Crenshaw-Imperial and Morningside Park;
- Continue to promote the development of high quality commercial office space at appropriate locations within the City through the redevelopment process; and
- Promote the development of commercial/recreational uses which will complement those which already are located in Inglewood.

The goals and objectives for the residential land use designation as identified in the Land Use Element are as follows:

- Encourage neighborhood stability and conservation by reducing the amount of land designated for high density development;
- Promote the maintenance, rehabilitation, and modernization of the City's housing stock;
- Encourage the preservation of Inglewood's fair share of housing for low and moderate income persons;
- Safeguard the City's residential areas from the encroachment of incompatible uses;
- Foster the revitalization or, if necessary, the recycling of residential areas which cannot provide a decent living environment because of jet noise impact;
- Encourage suitable condominium development as a means of diversifying types of housing and increasing the number of residents who own property; and
- Promote residential developments which will attract middle and upper income families who can afford the higher cost of recycled development.

### Conservation Element

The Conservation Element of the City of Inglewood General Plan, adopted 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 that may be pertinent to the Proposed Project. Key goals, objectives, and policies of the Conservation Element include:

- Protect aquifers and water sources (which includes prevention of contamination of ground water by surface contaminants leaching into the soil);
- Reduce the ever-increasing demand being placed on the aquifers and on the statewide water sources (with the greatest opportunity to reduce water demand will be a greater utilization of reclaimed water);
- Compliance with the National Pollutant Discharge Elimination System (NPDES); and
- Compliance with the Air Quality Management Plan.

For a full discussion of the conservation issues associated with the Proposed Project, see Sections IV.B (Air Quality), IV.F (Hydrology/Water Quality) and IV.D (Hazardous Materials/Risk of Upset) of this Draft EIR.

#### Housing Element

The Housing Element of the City of Inglewood General Plan, 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. A complete discussion of the population and housing impacts of the Proposed Project is provided in Section IV.H (Population, Housing, & Employment) of this Draft EIR.

#### Noise Element

The Noise Element of the City of Inglewood General Plan, 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, among others. The goals of the Noise Element which are applicable to the Proposed Project are to protect and maintain those areas having acceptable noise environments and to provide sufficient information concerning the community noise levels so that noise can be objectively considered in land use planning decisions. The Noise Element also contains several objectives and policies on noise management which are pertinent to the Proposed Project. These objectives and policies are identified below and are further analyzed under the “Project Impacts” subheading of this Land Use Section.

- Incorporate noise considerations into land use planning decisions;
- Ensure acceptable noise levels near schools, hospitals, convalescent homes, and other sensitive areas; and
- Encourage acoustical design for new construction.



A complete analysis of the noise impacts of the Proposed Project is contained in Section IV.F (Noise) of this Draft EIR.

### Safety Element

The Safety Element of the City of Inglewood General Plan, 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 purpose of the Safety Element is to:

*“...minimize the dangers associated with natural and manmade hazards by implementing standards, regulations and laws that will reduce loss of life, injuries and property damage resulting from disasters, and to provide for the continuity of government operations and civilian life during and after a major disaster.”*

The Safety Element has several objectives and policies which are pertinent to the Proposed Project. These objectives and policies are identified below and are further analyzed under the “Project Impacts” subheading of this Land Use Section.

- Provide measures to reduce seismic impacts.
- Restrict new structures for human occupancy from being constructed across active faults; and
- Require geological and soils engineering investigations in high risk fault areas.

### Circulation Element

The Circulation Element of the City of Inglewood General Plan, adopted 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. For a depiction of the circulation plan for the Proposed Project, see Figure II-8 “Conceptual Circulation Plan.” For a full discussion of the transportation and traffic issues associated with the Proposed Project, see Section IV.L (Transportation/Traffic) of this Draft EIR.

### Open Space

The Open Space Element of the City of Inglewood General Plan, 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.

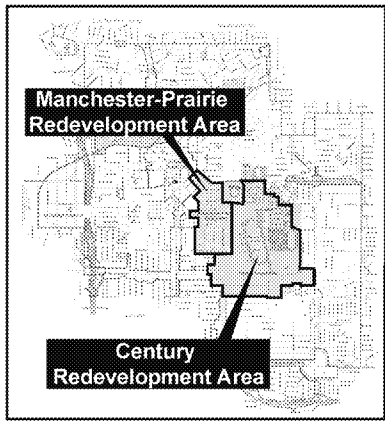
The purpose of the Open Space Element is two-fold. First, it is a plan to address the current and future recreation needs of the community for park and recreation facilities. Second, it is a plan for the conservation or creation of open space to mitigate the effects of the increasing urbanization of Inglewood. With respect to policies and objectives pertinent to park and recreation facilities, see Section IV.K.4, Public Services (Recreation and Parks). In regards to open space areas, the Open Space Element identifies two land use patterns that are represented on the Project Site: (a) parking lots and (b) earthquake fault zones. Although often viewed as an expanse of asphalt, parking lots can provide a major source of visual open space. The surface parking lot for the Hollywood Park Race Track and Casino is cited as one of the most notable expanses of open space within the City. Earthquake fault zones are generally excluded from being built upon and are accompanied by building setbacks and transitional land uses. The trace of the Potrero Fault Zone (part of the Newport Inglewood Fault System) crosses the eastern portion of the Hollywood Park Project Site, creating a sloping escarpment. As an area of increased seismic hazard, the Open Space Element suggests that this area not be built upon and should remain as some form of open space, either as a private greenbelt or play area within any future development of the site, or possibly as an addition to abutting Darby Park. For further discussion of the seismic issues related to the Proposed Project, see Section IV.C, Geology/Soils.

#### *The Merged Redevelopment Project Area*

The City of Inglewood has adopted six redevelopment projects over a 23-year period. On July 16, 1996 the City Council merged the six redevelopment projects (“Merged Inglewood Redevelopment Project” or (“Merged Project Area” each individual area, a “Constituent Redevelopment Project Area”), and amended and restated the existing redevelopment plans by adopting one redevelopment plan applicable to all six merged redevelopment projects 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 “Merged Redevelopment Project”). The Merged Project’s basic objectives are to eradicate the blighting influences within the Redevelopment Project Area, redevelop incompatible land uses and revitalize existing development to obtain and be consistent with the environmental, social, and economic goals of the community. As shown in Figure IV.I-4, the Project Site is located within portions of the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area. A discussion of the Constituent Redevelopment Project Areas is provided below.

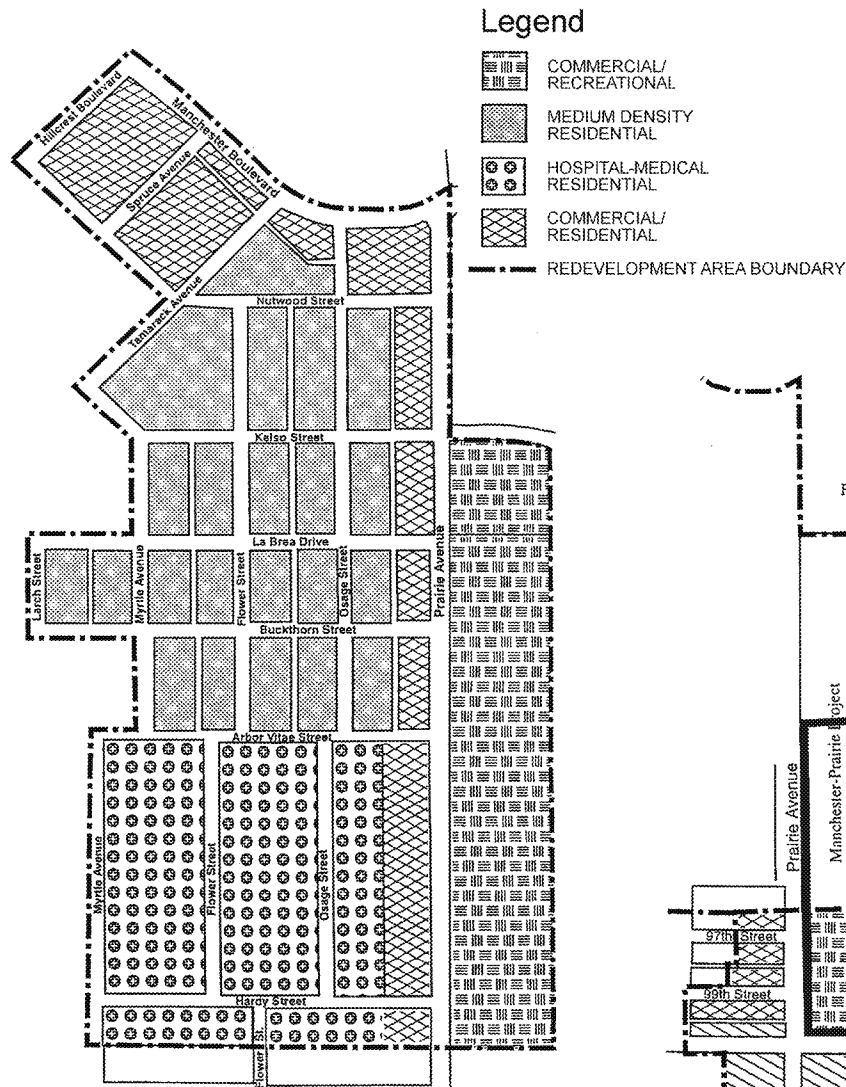
#### Century Constituent Redevelopment Project Area

The Project Site is located in a portion of the Century Constituent Redevelopment Project Area, which encompasses 483 acres of development including residential, commercial/retail, and industrial land uses. The Century Constituent Redevelopment Project Area is generally bounded by Prairie Avenue to the west, Manchester Boulevard to the north, Crenshaw Boulevard to the east, and 102<sup>nd</sup> Street to the south. The Century Project Area, adopted in July 1981 and most recently amended February 26, 2002, provides the Agency with powers, duties, and obligations to implement and further the redevelopment, rehabilitation, and revitalization of the Century Constituent Redevelopment Project Area. Redevelopment

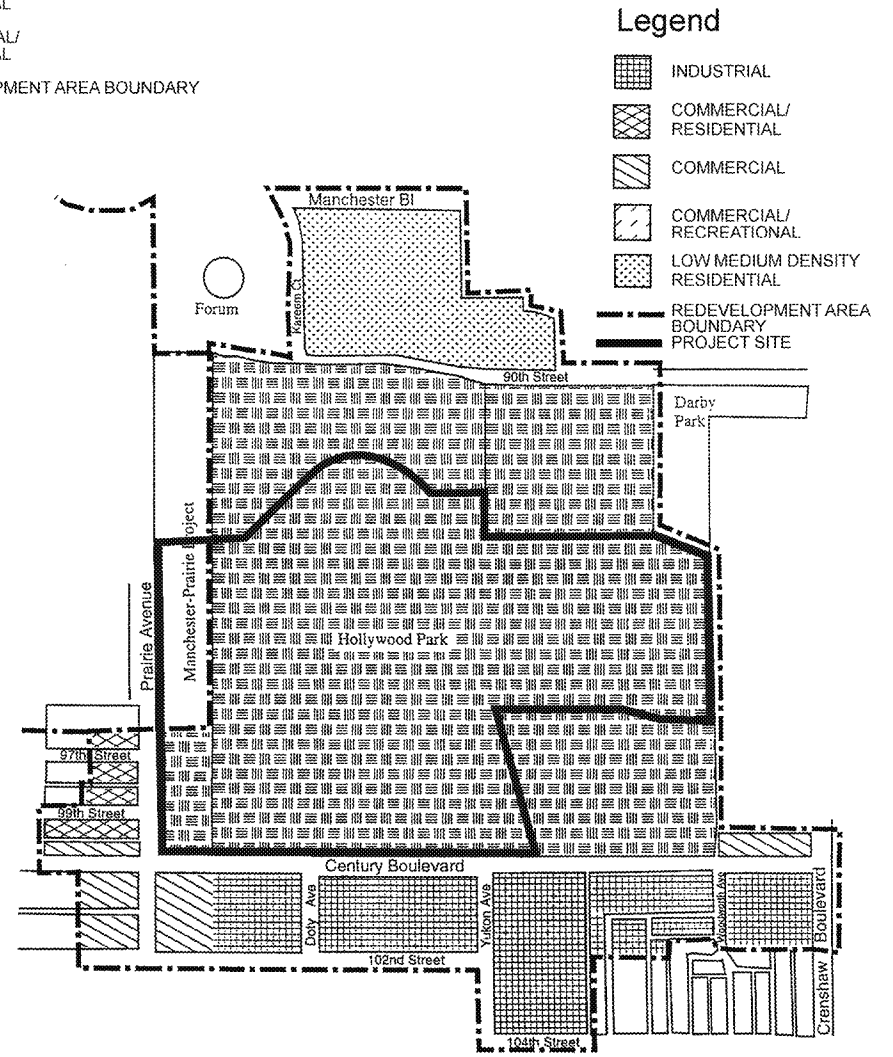


CITY OF INGLEWOOD REDEVELOPMENT LOCATION AREA MAP

### Manchester-Prairie Redevelopment Plan Map



### Century Redevelopment Plan Map



Source: City of Inglewood, 2002.

of the Century Constituent Redevelopment Project Area will attain the purposes of the California Community Redevelopment Law through addressing:

*“issues related to the prevalence of deteriorating conditions and under-utilization of a large part of the area, particularly properties along the major corridors. Some of the more critical issues centered on dilapidated housing stock, lack of investment, numerous vacant properties and buildings, inadequate public improvements, high crime rates, and substandard traffic and circulation improvements.”<sup>4</sup>*

For discussion of Community Redevelopment Law and Proposed Project’s contributions to affordable housing requirements, see Section IV.H, Population, Housing & Employment.

#### Manchester-Prairie Constituent Redevelopment Project Area

The Project Site is located in a portion of the Manchester-Prairie Constituent Redevelopment Project Area, which encompasses 200 acres of development including residential, commercial, and institutional land uses. It 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. The Manchester-Prairie Constituent Redevelopment Project Area provides the Redevelopment Agency with powers, duties, and obligations to implement and further the redevelopment, rehabilitation, and revitalization of the Manchester-Prairie Constituent Redevelopment Project Area. Redevelopment of the Manchester-Prairie Constituent Redevelopment Project Area will attain the purposes of the California Community Redevelopment Law as it was established for the following reason:

*“Issues related to economic deterioration, improper and irregular lot shapes, inadequate parking, provision of public facilities and improvements to support residential neighborhoods, and obsolete land use patterns created the need to establish the Manchester Prairie Redevelopment Project Area.”<sup>5</sup>*

For discussion of Community Redevelopment Law and Proposed Project's contributions to affordable housing requirements, see Section IV.H, Population, Housing & Employment.

#### *City of Inglewood Municipal Code/Zoning*

The development of the Proposed Project is also governed by the applicable land use, zoning, and subdivision regulations in the Inglewood Municipal Code (IMC), particularly Chapter 12, Planning and

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<sup>4</sup> City of Inglewood, Redevelopment Agency, Century Project Area, website: [http://www.cityofinglewood.org/depts/commdev/redevelopment/project\\_areas/century.asp](http://www.cityofinglewood.org/depts/commdev/redevelopment/project_areas/century.asp), April 13, 2007.

<sup>5</sup> City of Inglewood, Redevelopment Agency, Manchester-Prairie Project Area, website: [http://www.cityofinglewood.org/depts/commdev/redevelopment/project\\_areas/manchester\\_prairie.asp](http://www.cityofinglewood.org/depts/commdev/redevelopment/project_areas/manchester_prairie.asp), April 13, 2007.

Zoning. Chapter 12 includes the development standards for the various zoning districts in the City of Inglewood.

#### Allowable Uses

The Project Site is currently zoned with a C-R (Commercial and Recreation) zoning designation. Figure IV.I-5 depicts the existing zoning designations for the Project Site and the surrounding area. Pursuant to IMC Section 12-27, the C-R zoning designation permits the following types of land uses: animal exhibits (i.e. circuses, petting zoos, animal shows, bird shows, animal auctions and sales), animal competitions and shows (i.e. horse racing, harness racing and equestrian shows), athletic events (professional and amateur), social events (i.e. dances, charity benefits and balls), entertainment events (i.e. movies, closed circuit television, musicals, singing groups, talent acts, ice shows and water shows), banquets and dining events (political, public, charity, private, educational and charitable), conventions and conferences, exhibits (business, industrial and professional), movie sets and locations, live telecast and filming of commercials and documentaries, recreation and leisure events including: vehicular competitive events, children's activities (i.e. carnivals, fairs, animal rides, and amusement rides), game and video arcades, gaming clubs, public parking (surface, subsurface, and structures), and accessory uses and buildings, meaning those uses associated with the efficient operation or conduct of any of the permitted uses.

Supplementary uses are also permitted within the C-R Zone, subject to the approval of the Community Development and Housing Department. Supplementary uses that may be approved include hotels, motels (200 rooms or more per structure); restaurants (400 seats or more per structure); office buildings (50,000 square feet of floor area per structure); accessory commercial uses provided they are an integral part of the development of the above uses; and governmental facilities, excluding schools, storage yards, or maintenance yards.

#### Allowable Height Limit, Lot Area, and Setbacks
























Per IMC Section 12-27.5, the maximum allowable height for the C-R Zone is one hundred fifty (150) feet in height from natural grade. As described in IMC Section 12-27.7, a lot must contain at least one (1) acre or forty-three thousand five hundred sixty (43,560) square feet of area. In addition, if said lot has a frontage on a dedicated public street it shall be no less than one hundred (100) feet. Furthermore, pursuant to IMC Section 12-27.4, the C-R setback requirements are thirty (30) feet within any property line within this zone. The setback areas shall be used only for landscaping or landscaped parking areas and subterranean parking.

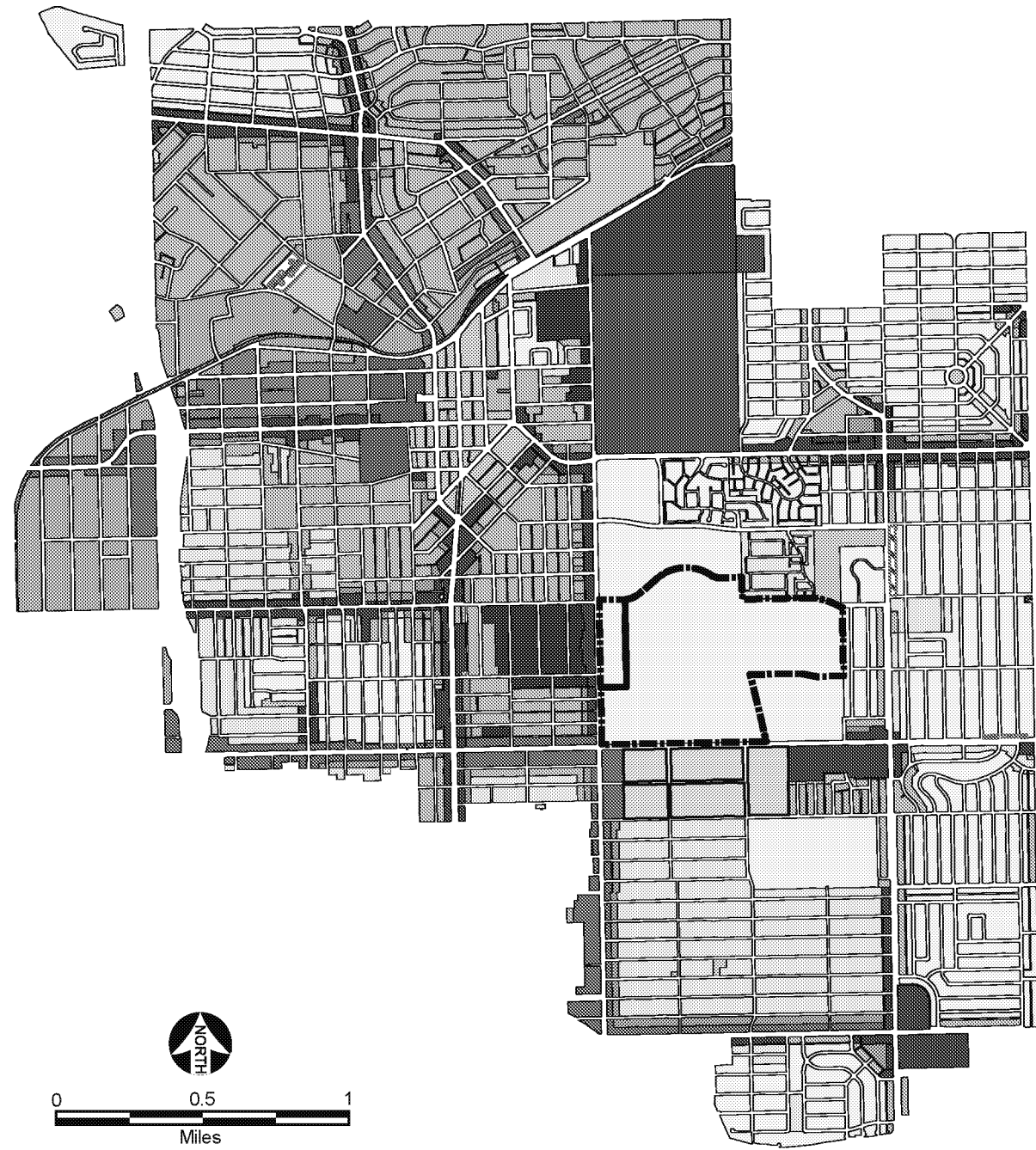
As described in IMC Section 12-27.8, no new development within the C-R zone shall be erected, located or placed within two hundred (200) feet of any single-family residential zone and no new stables or animal shelters shall be erected, located or placed within five hundred (500) feet of any single-family residential zone.

**Legend**

 Project Site

**ZONING**

-  C-1
-  C-2
-  C-2A
-  C-3
-  C-C
-  C-R
-  C-S
-  M-1
-  M-1L
-  M-2
-  O-S
-  P-1
-  R-1
-  R-1.5
-  R-1Z
-  R-2
-  R-2A
-  R-3
-  R-4
-  R-M
-  S-1
-  S-2
-  T-C



## ENVIRONMENTAL IMPACTS

### Methodology

#### *Land Use Consistency*

The following land use analysis addresses the Proposed Project's potential to physically divide an established community or conflict with applicable land use plans, policies, and regulations or an adopted habitat conservation or natural community conservation plan. This analysis aims to identify any potential conflicts with applicable plans, policies or regulations resulting from approval of the proposed Specific Plan, or from the physical changes to the environment that would occur as a result of project implementation.

#### *Urban Decay - Blight*

In order to assess the project's potential to result in urban decay or blight, HR&A Advisors Inc., conducted an economic and fiscal impact assessment of the Proposed Project. The following summarizes the methodology and findings of the economic impact assessment prepared by HR&A Advisors Inc., dated June 2, 2008.

The urban decay assessment measures the degree to which the operation of the Proposed Project's retail and related commercial uses could result in a significant adverse economic impact on existing and proposed retail developments in the same market area. Methodologically, any such impact is identified and measured by assessing the degree to which the amount of space planned for development in each of the Project's retail and other use categories would exceed the anticipated increase in the supportable amount of retail and other commercial space that can be supported, based upon the anticipated growth in future customer demand for comparable activities in defined market areas. If the Proposed Project's supply of such space exceeds the anticipated growth in demand, it would suggest that the Project could attract sales away from other existing or planned new business establishments of the same type. Such a finding, in turn, would require further investigation to assess whether it is reasonably foreseeable that this potential attraction of sales away from other businesses could result in disinvestment, business closures, abandonment, and/or other forms of physical deterioration that are indicators of "urban decay." If, on the other hand, the amount of retail and other commercial space planned for the Project is equal to or less than the amount of space that can be supported by projected future demand, it can be concluded reasonably that the scale of potential customer demand is sufficiently large enough that it can support both the Project and all other existing and planned space proposed for those same general use categories. There would be no need, therefore, to further evaluate the potential for urban decay associated with the Project. The report summarizing the findings is included as Appendix I.

Making these economic impact measurements typically requires: (1) establishing logical market areas appropriate for retail and other related uses for which space will be provided in the Project; (2) projecting the likely increase in customer demand based on population growth, income growth and spending patterns for retail and other related uses over the time period to stabilized Project operation (i.e., 2018); (3)

converting the projected changes in future customer demand to amounts of supportable retail and other types of commercial space measured in square feet of gross leasable area (GLA) or other appropriate units of analysis; and (4) making a comparison of the projected change in demand in the form of supportable space with the change in supply as represented by the increase in GLA or other measures proposed for the Project and other developments in the relevant market area(s).

Application of the assessment methodology described above relied on a market analysis for the Project's retail component that was prepared by Thomas Consultants for Wilson Meany Sullivan ("Market Study").<sup>6</sup> The Market Study includes an assessment of 42 nominally competitive retail facilities in Inglewood and elsewhere within about a 20-mile radius of the Project site (including street front retail concentrations, neighborhood retail centers, community retail centers, regional retail centers, super-regional retail centers, power centers, and hybrids of these traditional retail categories), delineation of a Primary Trade Area and a Secondary Trade Area around the Project Site, documents the current and projected future demographic characteristics of the Trade Areas, and estimates the scale of supportable floor area by retail and related use than can be captured by the Project.

### **Thresholds of Significance**

In accordance with Appendix G of the State CEQA Guidelines, a project may have a significant environmental impact if it were to:

- (a) Physically divide an established community;
- (b) 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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- (c) Conflict with any applicable habitat conservation plan or natural community conservation plan.

In addition to the threshold questions identified in Appendix G of the State CEQA Guidelines, the courts have recognized that there is a potential for proposed new retail and related commercial development to trigger economic competition with existing retailers and related uses in the project's host community.<sup>7</sup> If existing retailers and other uses are adversely affected by this competition, declines in sales could directly result in and/or lead to disinvestment, business closures, abandonment and other forms of physical deterioration that are indicative of "urban decay." If the severity of this change in physical circumstances is so substantial that it adversely affects appropriate use of the area or otherwise threatens the public health, safety or general welfare, this situation may cross a threshold that defines a "significant impact" under CEQA. Therefore, a significant land use impact would occur if the economic impacts of the

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<sup>6</sup> Thomas Consultants, Inc., *Hollywood Park Retail Opportunity Assessment*, February 2006.

<sup>7</sup> See, for example, *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4<sup>th</sup> 1184.



Proposed Project compete with local retailers to the extent that results in the potential for urban decay or blight.

### **Impacts Determined to be Less Than Significant**

With respect to threshold (c) above, because the Project is located in an urban area and is zoned for residential and commercial land uses this would not apply. Accordingly, no further analysis of this question is warranted.

### **Project Impacts**

The Proposed Hollywood Park Redevelopment Project will include a General Plan Amendment, amendment to the Merged Redevelopment Plan to update the Manchester-Prairie and Century Constituent Redevelopment Project Areas Maps and land use designations, adoption of the Hollywood Park Specific Plan, a Zone Change, and approval of Vesting Tentative Tract Map(s). The proposed Preliminary Land Use Plan, Building Heights Limit Map and Conceptual Circulation Plan are included in Figures II-4, II-7, and II-8, respectively in Section II, Project Description. Impacts related to land use consistency with current zoning and adopted plans and compatibility with existing land uses are addressed in greater detail below.

#### *Land Use Compatibility*

The residential, retail, commercial office, hotel, civic, open space and casino/gaming uses that are proposed within the Hollywood Park Redevelopment Project are substantially consistent with the surrounding land uses. The Proposed Project, however, through the adoption of a Specific Plan and a change in the zoning standards, will provide a comprehensive land use plan to establish specific land use zones and development standards to provide a vibrant mixed-use environment. The existing Hollywood Park Grandstand and associated track lighting and surface parking lots would be demolished and replaced with an arrangement of commercial office, retail, residential, civic, hotel, open space and casino/gaming land uses. The planned uses would be more compatible than the existing recreational use that currently occupies the Project Site, as the scale and massing of the structures within the planned development would be consistent with the low to mid-rise commercial and residential structures that exist in the immediate area. Land use compatibility impacts would therefore be less than significant.

The Proposed Project would not physically divide an established community. The existing Hollywood Park Racetrack and Casino facility is bounded by residential uses to the north and east, vacant land and the Forum to the north, and commercial land uses to the west and south along Prairie Avenue and Century Boulevard, respectively. The demolition of the existing horse racing-related land uses on the Project Site would not physically divide an established community, as no dwellings or dwelling units are currently

located on the Project Site.<sup>8</sup> The adjacent land uses would continue to exist and operate as they currently do under the existing land use configuration. The addition of retail and entertainment uses in the Mixed-Use area of the Project Site would provide compatible land uses near the existing casino. As compared to the compatibility of the existing uses (i.e. horse racing), the Proposed Project would result in a net beneficial impact with respect to blending existing residential and commercial uses with the proposed development. Therefore, the Proposed Project would have a less than significant impact on the existing communities surrounding the Project Site since it would not physically divide an established community.

### *Consistency with Regional Land Use Policies and Regulations*

#### *Regional Comprehensive Plan and Guide*

The Regional Comprehensive Plan and Guide (RCPG) includes several policies which are generally applicable to the Proposed Project. Consistency and compatibility of the Proposed Project with these policies is discussed in Table IV.I-1. As Table IV.I-1 demonstrates, the Proposed Project is substantially consistent with the goals and polices contained in the RCPG and thus would have a less than significant effect on RCPG policies.

**Table IV.I-1  
Comparison of Project Characteristics to RCPG Policies\***

<b>Growth Management Policies</b>	<b>Consistency of the Proposed Project</b>
<b><i>Growth Forecast Policies:</i></b>	
The population, housing and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.	The Proposed Project is consistent with the jobs forecasts, but is technically inconsistent with the population and housing forecast data provided by SCAG. However, on a regional basis, the region can support more housing given the level of jobs in the region. The creation of housing by the Proposed Project is consistent with the goals of the region to locate housing in close proximity to jobs, although technically inconsistent with the specific growth allocated to Inglewood. Moreover, as an infill redevelopment project that requires General Plan and Redevelopment Plan Amendments, adoption of a Specific Plan, and a zone change, this site was not reasonable foreseen as potential site for creating housing at the time the most current growth projections were being prepared (see Section IV.G, Population, Housing & Employment).
<b><i>Policies to Improve the Regional Standard of Living:</i></b>	
SCAG shall encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.	The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As an infill redevelopment, the Proposed

<sup>8</sup> The site currently includes dormitory-type sleeping quarters for some of the casual laborers who take care of the horses stabled in the barns at Hollywood Park; however, these dormitory-type sleeping quarters are not considered dwelling units. For a more detailed discussion, see Section IV. H. Population, Housing & Employment.

**Table IV.I-1  
Comparison of Project Characteristics to RCPG Policies\***

	Project would reduce costs by using and improving existing utility infrastructure. The Proposed Project would build upon existing infrastructure facilities and would be consistent with this RCPG policy.
SCAG shall support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.	The Proposed Project would minimize the need for new infrastructure and public service delivery through its location within an urbanized area already served by utility, public service, and transportation systems.
<b><i>Policies to Maintain the Regional Quality of Life:</i></b>	
SCAG shall encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled and create opportunities for residents to walk and bike.	The Proposed Project is a mixed-use community that will reduce the number of auto trips and vehicle miles traveled by placing housing opportunities in close proximity to transit and jobs. The Project will also create open space, retail, entertainment, casino/gaming and civic opportunities for residents to walk and bike. The Conceptual Circulation Plan also includes bike paths.
SCAG shall encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.	The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As such, it is an infill redevelopment project and would thus be consistent with this policy. The Project Site is located near well served public transit routes, including bus lines along Century Boulevard, Prairie Avenue and Crenshaw Boulevard, in addition to Metro Green Line stations at the Hawthorne Station and Crenshaw Station.
SCAG shall support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems and activity centers.	The Proposed Project proposes a Specific Plan for a mixed-use commercial and residential development in an area currently served by mass transportation services and facilities. Therefore, the Project would increase the development density at a strategic point for public transportation and would be consistent with this policy.
SCAG shall support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.	The Proposed Project is a mixed-use development project that integrates commercial, residential, civic and recreational open space areas. The proposed development is bounded by Prairie Ave and Century Blvd., which are both adequately served by mass transportation services, including buses and light rail service.
SCAG shall encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.	The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As such, it is an infill redevelopment project and would thus be consistent with this policy.
SCAG shall support and encourage settlement patterns which contain a range of urban densities.	The Proposed Project is a mixed-use development project that would provide a range of commercial and residential land uses at varying densities to provide a range of ownership housing opportunities.
SCAG shall encourage planned development in locations least likely to cause environmental impact.	The redevelopment of the existing Hollywood Park Turf Club and Casino property would reduce environmental impacts as the property is currently developed and supported by existing infrastructure and transportation facilities.
Vital resources such as wetlands, groundwater recharge	The Project Site does not contain any vital resources

**Table IV.I-1  
Comparison of Project Characteristics to RCPG Policies\***

<p>areas, woodlands, production lands and land containing unique and endangered plants and animals should be protected.</p>	<p>such as wetlands, groundwater recharge areas, woodlands, production lands or land containing unique and endangered plants and animals that should be protected. The redevelopment of the existing Hollywood Park Turf Club and Casino property would result in the removal of the existing artificial lakes that are located within the infield of the existing racetrack. The existing artificial lakes are lined and do not constitute a wetland or contribute to groundwater recharge. The Proposed Project includes a replacement water feature within the center of the site which would serve as an aesthetic resource, serve as a water retention and filtration system, and provide habitat for birds.</p>
<p>Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</p>	<p>The Project Site has been developed and disturbed in the past and is not known to contain any cultural or archeological resources. Although the structures on the Project Site are not significant historic resources, the Project includes design features to incorporate elements of the racetrack that have special historic character into the Proposed Project. See the Project Design Features under Section IV. E. Cultural Resources.</p>
<p>SCAG shall discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood or seismic hazards.</p>	<p>The Proposed Project is located within the Newport-Inglewood Fault Zone. Portions of the Potrero Fault traverse the eastern portion of the Project Site from north to south. The Proposed Project includes an open space restricted use area in this location and no habitable structures would be developed in this seismic set back zone. For a detailed discussion of geotechnical hazards and mitigation measures see Section IV.C, Geology/Soils.</p>
<p>SCAG shall encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage and to develop emergency response and recovery plans.</p>	<p>The Proposed Project has been designed in a manner that reduces or avoids the various environmental constraints that exist within the project area. For a detailed discussion of noise impacts and mitigation measures see Section IV.F, Noise. For a detailed discussion of geotechnical hazards and mitigation measures see Section IV.C, Geology/Soils. As the Project Site is currently developed, no biological resources would be impacted.</p>
<p><b><i>Policies to Provide Social, Political, and Cultural Equity:</i></b></p>	
<p>SCAG shall encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.</p>	<p>The Proposed Project would support implementation of this policy by including 2,995 new residential units (see Section IV.G, Population, Housing &amp; Employment). For a detailed discussion of contributions to affordable housing through tax increment financing and the 20% set-aside see Section IV.G, Population, Housing &amp; Employment.</p>
<p>Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement and fire protection.</p>	<p>The Proposed Project would include development features that would promote sustainability and mitigation measures that would promote energy and water conservation (see Section IV.J, Public Utilities). The Proposed Project would also not significantly impact public services (see Section IV.J, Public</p>

**Table IV.I-1  
Comparison of Project Characteristics to RCPG Policies\***

	<p>Utilities). Also, as part of the Project’s Plot Plan Review process under the Hollywood Park Specific Plan, each builder would incorporate energy efficiency measures and other conservation measures from the Hollywood Park Sustainability Strategy Checklist contained in the Specific Plan. The creation of this mixed-use community would not inhibit the ability of the City of Inglewood to provide such services equitably to all of its citizens. The Project also includes a 4-acre site which is proposed to be made available to a public entity for civic uses. The Project also includes an on-site police substation in the mixed-use area of the Project Site. Therefore, the Proposed Project would be consistent with this policy.</p>
<p><i>* This table lists only those policies contained in SCAG’s RCPG that are applicable to the Proposed Project. Source: Christopher A. Joseph &amp; Associates.</i></p>	

*SCAG’s Growth Visioning Goals*

The Proposed Project would be consistent with SCAG’s Growth Visioning goals as the Proposed Project would foster improved mobility by providing a mixed-use community with increased jobs and housing opportunities. The Proposed Project would provide up to 2,995 new residential units and up to 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, a 300-room hotel and a renovated Casino/gambling facility. By incorporating a balance of new employment, residential and retail/entertainment uses within the same development, the project will promote mobility (walkability) and livability. Further, the compact nature of the design of the Proposed Project combined with the provision of pedestrian walkways, paseos and sidewalks throughout the development also promotes the walkability of the development. In addition, the project study area is currently well served by several transit services provided by the Los Angeles County Metropolitan Transportation Authority (MTA) and is surrounded by major transit corridors. As discussed in Section IV.L, Traffic/Transportation, the MTA operates ten transit routes along these four major roadways surrounding the Project Site. Additionally, the two closest Metro Green Line Stations to the Project Site include the Hawthorne Station, which is located approximately one mile to the southwest, and the Crenshaw Station, which is located approximately one and a half miles to the southeast. As discussed in Section IV.J, Public Utilities, the Proposed Project is seeking to maximize environmental sustainability by incorporating energy efficient fixtures and water conservation measures into the project. As a result, the Proposed Project would maximize environmental sustainability and would thus be consistent with SCAG’s Growth Visioning goals.

*South Coast Air Quality Management District*

As discussed in further detail in Section IV.B, Air Quality, the Proposed Project would result in a significant and unavoidable impact as it would result in a technical inconsistency with the growth projections used to establish the AQMP.

*Regional Water Quality Control Board*

The Proposed Project includes a number of Project Design Features (PDFs) intended to reduce or avoid water quality and hydrologic impacts. These PDFs include site design, source control, and treatment control Best Management Practices (BMPs) that will be incorporated into the Proposed Project and are thereby considered a part of the Proposed Project for purposes of impact analysis. Site design and source control BMPs help to manage the quantity and quality of both wet and dry weather runoff by limiting the frequency of occurrences and decreasing pollutant concentration. Treatment control BMPs are designed to remove pollutants once they have been mobilized by rainfall and runoff. The Proposed Project includes the following site design, source control, and treatment control PDFs:

- Stormwater runoff from all urban areas within the Project Site will be routed to structural treatment BMPs;
- Arroyo Park will be a linear, landscaped PDF located within the median right-of-way of the Arroyo;
- The approximately 9-acre Lake Park includes an upper and lower lake and will be landscaped with native and ornamental vegetation around the majority of its perimeter;
- Vegetated BMPs include an array of BMP types that utilize several natural treatment processes such as vegetative filtration and uptake, infiltration, adsorption, and microbially-mediated transformations;
- Catch basin inserts with stormwater screening and filtration devices will be placed directly in conventional catch basins;
- Volume-based treatment control BMPs for the Proposed Project will be sized to capture and treat at least 80 percent of the annual runoff volume from the tributary drainage area;
- Flow-based BMPs for the Proposed Project will be sized using a rainfall intensity of 0.2 inches per hour, which will result in treatment of the same portion of runoff (ie: at least 80%) as using volumetric standards described above;
- The Proposed Project will include source control measures such as education programs for owners, occupants, and employees in the proper application, storage, and disposal of pesticides that will be used at the Project Site; and
- Source controls such as street sweeping, public education, fines for littering, and storm drain stenciling can be effective in reducing the amount of trash and debris that is available for mobilization during wet and dry weather events;

- In order to minimize the potential generation and transport of dissolved constituents, native or drought-tolerant vegetation that requires little watering and chemical application will be planted in 50 percent or more of the public landscaped areas.

As discussed in greater detail in Section IV.F, Hydrology/Water Quality, the applicant will be required to obtain a National Pollution Discharge Elimination System (NPDES) and statewide General Construction Activity Permit from the RWQCB prior to construction. In accordance with the RWQCB requirements, the Project Applicant would need to file a Notice of Intent and prepare a Storm Water Pollution Prevention Plan (SWPPP) prior to any construction activity. As part of the SWPPP, the Proposed Project would be required to implement effective best management practices (BMPs) to minimize water pollution to the maximum extent practical. In addition, the final drainage plans would be required to provide structural or treatment control BMPs to mitigate (infiltrate or treat) storm water runoff. Implementation of the BMPs in the project SWPPP and compliance with the City's surface water discharge requirements would ensure that the project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality. As such, the project would be consistent with the applicable water quality policies of the RWQCB and impacts upon water quality would be less than significant.

#### *Congestion Management Plan*

The Proposed Project's Traffic Impact Analysis, which is presented in greater detail in Section IV.L (Traffic/Transportation) of this Draft EIR and as Technical Appendix G-1, was prepared in accordance with the County of Los Angeles CMP and City of Inglewood Department of Public Works Guidelines. As discussed in Section IV.L, the Proposed Project is expected to significantly impact one CMP intersection: CMP station 24 at Crenshaw Boulevard and Manchester Boulevard (also Study intersection No. 45). Funding the installation of an ITS traffic signal program has been proposed as an effective mitigation measure to reduce this impact to less than significant levels. With respect to CMP freeway monitoring locations, the Proposed Project would not exceed the CMP Traffic Impact Analysis Guidelines of adding 150 or more weekday morning or afternoon peak hour trips at any of the three CMP freeway monitoring locations identified within the study area. With respect to transit trips, the Traffic Impact Analysis concluded that the Proposed Project would result in a less than significant impact upon existing transit routes serving the project area. Therefore, the Proposed Project would be consistent with the CMP.

#### *Los Angeles County Airport Land Use Plan*

As discussed above, the southernmost portions of the Proposed Project Site fronting Century Boulevard are located within the boundaries of the Airport Influence Area for LAX. As such, the proposed Specific Plan has been developed in a manner that is consistent with the land use compatibility standards of the Airport Land Use Plan. Likewise, the area of the project that falls within the airport area of influence will be presented to the Airport Land Use Commission for a consistency determination. The residential and commercial land uses would be constructed in a manner that ensures adequate noise attenuation from

aircraft noise. A detailed analysis of the Proposed Project's consistency with the policies and objectives of the Los Angeles County LAX Airport Land Use Plan is presented below in Table IV.I-2.

**Table IV.I-2  
Consistency Analysis of the Los Angeles County LAX Airport Land Use Plan**

<b>General Policies</b>	
G-1 Require new uses to adhere to the Land Use Compatibility Chart.	The Proposed Project has been designed in a manner that is consistent with the Airport Land Use Plan Land Use Compatibility Chart. All residences, including any proposed residential uses that fall within the Airport Influence Area's 65 dBA CNEL contour, would be developed in a manner that achieves a 45 dBA interior noise level.
G-2 Encourage the recycling of incompatible land uses to uses which are compatible with the airport, pursuant to the Land Use Compatibility Table.	The Proposed Project has been designed in a manner that is consistent with the Airport Land Use Plan Land Use Compatibility Chart. All residences, including any proposed residential uses that fall within the Airport Influence Area's 65 dBA CNEL contour, would be developed in a manner that achieves a 45 dBA interior noise level.
G-3 Consider requiring dedication of an aviation easement to the jurisdiction owning the airport as a condition of approval on any project within the designated planning boundaries.	Portions of the Proposed Project Site are located within the designated airport influence area for LAX. However, the Project Site does not include any existing or proposed aviation easements. As such, this policy is not applicable to the proposed development.
G-4 Prohibit any uses which will negatively affect safe air navigation.	Portions of the Proposed Project Site are located within the designated airport influence area for LAX. The Proposed Project would be developed in accordance with the development guidelines of the applicable Airport Land Use Plan and would not negatively impact safe air navigation. Therefore, the Proposed Project would be consistent with this policy.
G-5 Airport proprietors should achieve airport/community land use compatibility by adhering to the guidelines of the California Noise Standards.	The Proposed Project does not include any aviation related uses and, as such, is not subject to this policy.
<b>Policies Related to Noise:</b>	
N-1 Use the Community Noise Equivalent Level (CNEL) method for measuring noise impacts near airports in determining suitability for various types of land uses.	As stated above, all residences, including any proposed residential uses that fall within the Airport Influence Area's 65 dBA CNEL contour would be developed in a manner that achieves a 45 dBA interior noise level.
N-2 Require sound insulation to insure a maximum interior 45 db CNEL in new residential, educational, and health-related uses in areas subject to exterior noise levels of 65 CNEL or greater.	New residential or educational land uses on the Project Site, including relevant portions of the Proposed Project that fall within the 65 db CNEL, would be designed and developed to achieve an interior 45 db CNEL.
N-3 Utilize the Table Listing Land Use Compatibility for Airport Noise Environments in evaluating projects within the planning boundaries.	Portions of the Proposed Project are located within the 65 dBA CNEL Noise contour of the LAX Airport Land Use Plan. Relevant land uses of the proposed development would include building insulation standards or other sound attenuation or design methods to ensure adequate interior noise environments. As such, the project would be consistent with the Land Use Compatibility Guidelines for airport noise environments.



N-4 Encourage local agencies to adopt procedures to ensure that prospective property owners in aircraft noise exposure areas above a current or anticipated 60 db CNEL are informed of these noise levels and of any land use restrictions associated with high noise exposure.	Consistent with this policy and the requirements of AB 2776, proper airport noise and hazard disclosure forms will be provided to new potential residential property owners prior to the close of escrow.
<b>Policies Related to Safety</b>	
S-1 Establish "runway protection zones" contiguous to the ends of each runway. These runway protection zones shall be identical to the FAA's runway protection zone (formally called clear zones).	The Proposed Project is not within a runway protection zone. Thus this policy is not applicable to the Proposed Project.
S-2 Prohibit above ground storage of more than 100 gallons of flammable liquids or toxic materials on any one net acre in a designated runway protection zone. It is recommended that these materials be stored underground.	The Proposed Project is not within a runway protection zone. Thus this policy is not applicable to the Proposed Project.
S-3 Prohibit, within a runway protection zone, any use which would direct a steady light or flashing light of red, white, green or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following take-off or toward an aircraft engaged in a final approach toward landing at an airport.	The Proposed Project is not within a runway protection zone. Thus this policy is not applicable to the Proposed Project.
S-4 Prohibit, within a designated runway protection zone, the erection of growth of objects which rise above an approach surface unless supported by evidence that it does not create a safety hazard and is approved by the FAA.	The Proposed Project is not within a runway protection zone. Thus this policy is not applicable to the Proposed Project.
S-5 Prohibit uses which would attract large concentrations of birds, emit smoke, or which may otherwise affect safe air navigation.	The Proposed Project does not propose any uses which would attract large concentrations of birds, emit smoke, or which may otherwise affect safe air navigation. The proposed lakes, which could attract migratory and aquatic birds, would replace the existing lakes that currently exist in the center of the racetrack. As such, the Project will not attract any more birds than currently exist in the area.
S-6 Prohibit uses which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.	The Proposed Project includes the development of a mixed-use residential/commercial community and does not propose any land uses or structures that would generate electrical interference with aircraft instrumentation.
S-7 Comply with the height restriction standards and procedures set forth in FAR Part 77.	The height restriction standards and procedures outlined in FAR part 77 restrict structures or objects that exceed 200 feet in height above grade to be erected within a CLUP. Most of the structures proposed would be below 75 feet in height. The hotel building would be approximately 150 feet in height. As such, the Proposed Project would be consistent with this policy.
<i>Source: Planning Policies and Programs of the Los Angeles County Airport Land Use Plan (1991). Consistency analysis provided by Christopher A. Joseph &amp; Associates.</i>	

*City of Inglewood General Plan*

The Proposed Project would not be consistent with the current General Plan land use designation of the Project Site. As such, a General Plan Amendment permitting mixed-use development would be required to bring the project in conformance with the General Plan. The Hollywood Park Redevelopment Project would involve a Specific Plan to facilitate the planned development of a mixed-use master planned community. With adoption of the proposed General Plan Amendment, land use impacts would be less than significant.

*Specific Plan*

The Hollywood Park Redevelopment Project would involve adoption of the Hollywood Park Specific Plan (the “Specific Plan”) to facilitate the planned development of a mixed-use master planned community. The Specific Plan creates a comprehensive set of regulations to allow for the creation of a mixed-use development of the scale of the Proposed Project. The Specific Plan provides a land use framework to redevelop the Project Site. The Specific Plan: (i) determines the appropriate location and intensity of development, mix of land uses and building heights, (ii) guides the character of the land planning to ensure high-quality, place-making improvements are made to the Project Site, (iii) establishes public and private sector implementation measures and responsibilities that adequately address local and regional impacts, and (iv) defines the future locations and dimensions of streets, rights-of-way and other access ways. The Specific Plan will be implemented through the Plot Plan Review process established in the Specific Plan.

The Specific Plan also implements cutting-edge sustainability features at the community-level of the development, and at the individual building level through the Plot Plan review process. Individual builders would incorporate energy efficiency measures and other conservation measures from the Hollywood Park Sustainability Strategy Checklist contained in the Specific Plan. See PDF B-1 in Section IV.B, Air Quality.

With adoption of the Specific Plan, land use impacts will be less than significant.

*Merged Redevelopment Project Area*

The Merged Redevelopment Project’s basic objectives are to eradicate the blighting influences within the Merged Redevelopment Project Area, redevelop incompatible land uses and revitalize existing development to obtain and be consistent with the environmental, social, and economic goals of the community. The Proposed Project would be generally consistent with the goals and intent of the Merged Redevelopment Plan as the Proposed Project would redevelop an existing property that is currently underutilized. As discussed in further detail in Section IV.H, Population, Housing & Employment, horseracing in California is a declining business industry largely due to increased competition for the public’s recreation and entertainment dollars. The increases in Indian gaming in California and the increases in purses in other states have called into question the long-term economic viability of horse racing in California. As such, the redevelopment of the Project Site would promote the Merged

Redevelopment Plan's goal to revitalize existing development in a manner that is consistent with the environmental, social and economic goals of the City.

The portions of the Project Site that fall within the Manchester-Prairie and Century Constituent Redevelopment Project Areas are designated for Commercial/Recreational and Commercial/Residential land uses. As required by the Merged Redevelopment Plan, the areas designated for Commercial Recreation shall be developed and used for recreation and entertainment facilities with such supplementary uses as hotels, motels of 200 rooms per structure, restaurants, office buildings, or accessory commercial uses as approved by the Agency. The Commercial/Residential land use category allows for mixed commercial and residential. The Proposed Project, considered as a whole, would not be consistent with the Merged Redevelopment Plan as it proposes a mixed-use planned community with residential, retail, commercial, casino/gaming, civic, and open space land uses. Although the hotel and casino/gaming uses contemplated would be consistent with the Commercial/Recreational designation, and some commercial and residential uses may be consistent with the Commercial/Residential designation, the majority of the Site is designated Commercial/Recreational while the designation of Commercial/Recreational is only applicable to a small portion of the western side of the Project Site that is currently developed with parking lots. (See Figure II-4, Preliminary Land Use Plan in Section II, Project Description). The Project would require an amendment to the Merged Redevelopment Plan. With the approval of the proposed amendments, the project would be brought into conformance with the Merged Redevelopment Plan, and land use consistency impacts would be less than significant.

For a discussion of Community Redevelopment Law and the Proposed Project's contributions to affordable housing requirements, see Section IV.H, Population, Housing & Employment.

#### *Inglewood Municipal Code/Zoning*

The Casino would be renovated and reconfigured in its existing location on the Project Site. This Site would retain the existing zoning of the site that allows casino operations (i.e., the portion of the site will remain zoned C-R). The remainder of the Proposed Project would not be consistent with the current zoning designations of the Inglewood Municipal Code. As such, a Zone Change and the adoption of a Specific Plan would be required to bring the remaining portions of the Proposed Project into conformance with the Inglewood Municipal Code. The Zone Change would also bring the proposed project into conformance with the General Plan Amendment and the Merged Redevelopment Plan Amendment, as discussed above. The remodeled and reconfigured Casino will not be closer than 200 feet to any single family residential zone; however, multi-family residential uses will be located within 200 feet. With adoption of the proposed Zone Change, land use impacts would be less than significant.

#### *Urban Decay/Blight*

Based on an economic evaluation of the Proposed Project's economic and fiscal impacts conducted by HR&A Advisors Inc., (HR&A), there is no foreseeable possibility that development of the Proposed Project would divert significant amounts of sales from existing or other planned retail developments. Therefore, the Proposed Project will not lead to the chain reaction of events that could lead to "urban

decay” (i.e., disinvestment, store closures, abandonment and resulting blight). As discussed in further detail below, potential impacts associated with the Project’s potential to result in urban decay or blight as a result of economic competition would be considered less than significant.

### *The Competitive Retail Environment*

According to the Market Study, the trade area’s existing retail inventory is dominated by supermarket-anchored (or convenience-oriented) strip centers and large format retailers along major freeways and arterial routes (e.g., San Diego Freeway, Century Boulevard, Slauson Avenue, and Hawthorne Boulevard), which maximize accessibility and visibility for vehicle traffic. The City of Inglewood’s retail inventory is concentrated near the downtown core (La Brea Ave. and Manchester Boulevard), the Century Boulevard corridor where the largest retail centers (e.g., Hollywood Park Marketplace, Village at Century, Century Plaza) are located, as well as some of the more affluent neighborhoods of the area, and towards the south.

The retail focus surrounding the site is mainly single-purpose with value-oriented retailer representation, as well as food and beverage in the form of a few fast-food and casual dining venues. Street-front retail, such as on Market Street, Inglewood Ave. and Arbor Vitae, consists primarily of local “mom & pop” shops of small to mid-sized scale. Although the Forum holds large-scale concerts, there is no cinema or intimate performance venue close to the Project site. Westfield’s Fox Hills Mall has strong local retailer representation, but most area-wide retail centers are dominated by a repetition of several department stores, supermarkets and national branded stores.

In sum, Inglewood’s retail marketplace is experiencing some growth in large format and value-oriented retail stores. But it is also experiencing a transition towards more aspirational goods and services, due to shifting demographics and new market rate residential developments. This growth and evolution in retailing responds to the City’s increasingly strong demographics and spending power. On the other hand, lagging competitiveness with surrounding areas has resulted in a significant outflow of retail spending. Despite recent introductions of national chains to the area, the Market Study found that retail selection and brand name representation in Inglewood is limited. This limited range of retailers may not create strong appeal for local residents or regional visitors to perceive Inglewood as a shopping destination.

### *Trade Area Demographics and Growth in Purchasing Power*

The Market Study also documents the current and projected future demographic and expenditure characteristics of two trade areas around the Project site. A Primary Trade Area (PTA), from which most business at the Project’s retail and related commercial uses is likely to originate, is bounded roughly by West Florence Avenue on the north, West El Segundo Boulevard on the south, the San Diego (405) freeway on the west and the Harbor (110) freeway on the east. The PTA was also divided into two parts (PTA West and PTA East) along South Western Avenue) to enable further analysis of submarket differences. A Secondary Trade Area (STA), which would be the source of remaining market demand, is

bounded by Exposition Boulevard on the north to Redondo Beach Boulevard on the south, and from about South Sepulveda Boulevard on the west to somewhat east of South Alameda Street.

The total population of the combined trade area is currently 918,226 residents, and its population is projected to increase at an average annual growth rate of 1.27% to over 1.04 million people in 2015, for an increase of over 123,000 new residents. Population growth is expected to vary significantly across the Trade Area. PTA West, within which Hollywood Park is located, has a current population of 164,690 and is expected to grow at a stable 0.96% annually. By 2015 there are expected to be slightly more than 181,113 people living in this key submarket. This projection does not incorporate the substantial residential development on the Hollywood Park development itself, which was analyzed separately. The STA's projected annual percentage population growth rate is growing slightly more rapidly than the PTA, averaging 1.33% between 2005 and 2015. This will result in expected population of 760,511 by 2015.

Average household income in PTA West (\$47,066) and PTA East (\$34,279) is 73 percent and 53 percent of the national averages, respectively. Total household income in the Trade Area is currently \$11.9 billion, with \$3.2 billion in the PTA alone. Total Trade Area household income is forecast to grow at an average rate of 2.46% per annum over the next five years, driven by growth in population and increases in per capita income. The \$11.9 billion household income total is expected to grow to \$13.4 billion by 2015, with a commensurate increase in retail expenditures.

The Market Study also found that PTA residents have per capita expenditures of \$5,805 on retail and leisure, which is 61 percent of the national average. The STA exhibits a higher spending profile than the PTA, with per capita spending of \$6,394 or 67 percent of the national average. The STA includes a broad variety of consumer markets, with lower spending in its eastern areas, and higher spending closer to the West Side of Los Angeles. Specifically, while PTA residents spend 78 percent the national average on Groceries and 81 percent on Personal Care, they spend only 67 percent of the national average on Apparel, 43 percent on Home Furnishings and 44 percent on Home Improvement. The PTA represents a \$1.54 billion dollar retail and leisure market in 2008. This is projected to grow to \$2.39 billion in 2018, or a 3.7 percent annual increase between 2008 and 2018. The STA will represent a \$4.54 billion dollar retail and leisure market in 2008. This is projected to increase to \$6.65 billion in 2015, or a 3.9 percent annual increase between 2008 and 2018. The total Trade Area is expected to grow from a \$6.2 billion dollar retail and leisure market in 2008 to over \$9.0 Billion in 2018, or a 3.9 percent average annual increase. By 2008, the five largest categories of retail spending in the Trade Area will include Groceries (\$1.6 billion), Restaurants and Cafés (\$1.1 billion), Apparel (\$679 million), Home Furnishings and Accessories (\$415 million), and Pharmacy (\$333 million).

#### *Project's Retail and Related Commercial Positioning and Market Differentiation*

Taking all of the above information into account, the Market Study found a number of market voids in the surrounding market area, and hence, opportunities for a new retail and leisure development at the Project site that could be clearly differentiated from existing retail development. More specifically, the Project will respond to an opportunity to create a hybrid retail and leisure development in a mixed-use setting, which consists of various retail formats, types and sizes, and price points to appeal to a broader range of

customers than is available in the market currently. It will be distinguished from its competitors by emphasizing “lifestyle” amenities commonly found in newer retail centers. These would include a pedestrian-friendly environment, a public gathering place such as a Town Square, quality design and landscaping, and other place-making features. It will also focus on families, particularly those with younger children, due to a lack of family-oriented retail in the competitive marketplace, and the trade area’s cultural diversity. This may include, for example, a broad range of family-oriented retailing, food and beverage and entertainment in a venue that provides for authentic “experiences” that cannot be found within competing projects in the area.

#### *Project’s Share of Supportable Floor Area*

Although a specific leasing program will be subject to market conditions at the time space is available to be leased, the current program anticipates allocating about 18 percent of the maximum 620,000 square feet GLA to convenience goods (e.g., groceries, drugs and specialty foods), 62 percent to comparison retail (e.g., general merchandise, apparel, home furnishings and specialty retail) and 20 percent to entertainment uses (e.g., cinema and eating and drinking places).

Based on the projected growth in retail and related household expenditures, population and incomes to 2012, the year that the retail uses are scheduled to be open, the PTA will support an increase of about 669,000 square feet GLA of retail and related commercial space, the STA will support about 1.7 million more square feet GLA of additional space, and the combined market area will support about 2.4 million square feet GLA of additional space, according to the Market Study. By 2018, when all of the Project’s uses are open, the PTA will support an increase of about 1.7 million square feet GLA of retail and related commercial space, the STA will support another 4.4 million square feet GLA of space, and the entire market area will support about 6.0 million square feet. Thus, the Project’s 620,000 square feet GLA are within the amounts of floor area that can be supported by growth in demand within each trade area in both time periods.

#### *Conclusion About the Potential for “Urban Decay”*

As discussed above, the general market orientation for the Project’s retail and related commercial uses as a hybrid retail and leisure development in a mixed-use setting that caters to families and targets the trade area’s cultural diversity is specifically designed to distinguish itself from existing retail offerings, including the kind of “mom & pop” retail that characterizes Inglewood’s existing street front retail concentrations. Therefore, the Project is unlikely to compete directly with existing retail located in Inglewood, and will not cause significant reductions in sales at existing street retail concentrations or retail centers.

More specifically, the maximum of 620,000 square feet GLA of floor area planned for the Project is well within the scale of floor area that can be supported by future growth in demand by 2012 and 2018, within both Primary Market Area, Secondary Market Area and total Market Area, leaving supportable floor area and demand to be captured by existing and other new retail developments. As a result, there is no foreseeable possibility that development of the Project would seize significant amounts of sales from

existing or other planned retail developments, and therefore it will not lead to the chain reaction of events that could lead to “urban decay” (i.e., disinvestment, store closures, abandonment and resulting blight).

### Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would be accomplished within the same building parameters. This exchange in the use of buildings would occur at relatively limited locations within the Project Site. There would be no substantial variation in the Project’s street configurations or relationship to the surrounding community. The development would be subject to the same design criteria (e.g. building height limits, setbacks, etc.) as the Proposed Project.

The exchange of the land uses would constitute a slight variation in the overall use mix of the Proposed Project. Table II-1 in Section II, Project Description, shows the change in land use under the Equivalency Program. A summary of the proposed land use alterations under the Equivalency scenarios is presented below in Table IV.I-3.

**Table IV.I-3  
Equivalency Program Land Use Change**

<b>Equivalency Program Land Use Change</b>				
<b>Development Scenario</b>	<b>Residential Land Use</b>	<b>Retail Land Use</b>	<b>Office/Commercial Land Use</b>	<b>Hotel Land Use</b>
<b>Proposed Project*</b>	2,995 Units	620,000 sf	75,000 sf	300 Rooms
<b>Equivalency Scenarios</b>				
<b>Maximum Housing 1</b>				
% Change in Land Use	17%	-7%	-33%	-17%
<b>Maximum Housing 2</b>				
% Change in Land Use	17%	-5%	-33%	-33%
<b>Maximum Housing 3</b>				
% Change in Land Use	17%	-7%	-7%	-33%
<b>Maximum Retail</b>				
% Change in Land Use	0%	8%	-33%	-33%
<b>Maximum Office/Commercial</b>				
% Change in Land Use	0%	-7%	135%	-33%
<b>Maximum Hotel</b>				
% Change in Land Use	0%	-7%	-33%	67%
<i>Note: Only includes land uses from the Proposed Project that correspond to the land uses that can be converted under the Equivalency Program.</i>				
<i>Source: Hollywood Park Land Company, 2008.</i>				

These variations would not substantially alter the overall mixed-use character of the Project. They would allow flexibility in the land use mix to address market conditions and the future needs of those who live

and work at the Project Site. To the extent the Equivalency Program is utilized to maximize the number of dwelling units on the Project Site (i.e. under Maximum Housing Scenarios 1, 2 and 3), the resulting impacts are similar to those discussed in Alternative 3,500 in Section VI. E., where the development of 3,500 units with a slight decrease in the amount of office/commercial space with the same mix of other land uses under the Proposed Project is analyzed. Therefore, the uses that could occur under the Equivalency Program, as is the case with the Proposed Project, would be compatible with the existing plans and the planned densities, and impacts regarding the regulatory framework would be less than significant.

Development under the Equivalency Program would occupy the same development areas as the Proposed Project and the overall character of development would be essentially the same as with the Proposed Project. Therefore, the relationship to surrounding neighborhoods and communities would be the same under the Equivalency Program as with the Proposed Project, and would not divide the surrounding neighborhood, community or land use. As with the case of the Proposed Project, impacts regarding the relationship to the surrounding community under all Equivalency Scenarios would be less than significant.

## **CUMULATIVE IMPACTS**

Cumulative land use impacts could occur if other related projects in the vicinity of the Project Site would result in land use incompatibility effects in conjunction with the impacts of the Proposed Project, including the proposed Equivalency Program. The Proposed Project, including the proposed Equivalency Program, would implement important local and regional goals and policies for the project area, which would assist the City of Inglewood in achieving short- and long-term planning goals and objectives. Based on a review of the related projects list provided in Section III, Related Projects, the Proposed Project, including the Equivalency Program, would be consistent with the planned uses identified in the vicinity of the Project Site. The geographic scope of the cumulative land use analysis is primarily limited to the related projects that border the Project Site or are otherwise located within an area that could be adversely affected by the proposed development from a land use compatibility perspective. The Forum property and the Wal-Mart property, both located immediately north of the Proposed Project, are proposed to be eventually re-developed with some level of commercial land uses. The design features of each project would be evaluated on a case-by-case basis to determine consistency with the General Plan and Zoning Code, and compatibility with surrounding land uses. Furthermore, all related projects would be subject to the same development standards as the Proposed Project, specifically with respect to the Inglewood General Plan, the Merged Redevelopment Project Area, the City of Inglewood Zoning Code (Chapter 12 of the Inglewood Municipal Code), and the other regional land use plans. Therefore, no significant cumulative land use impacts are anticipated.

## **PROJECT DESIGN FEATURES**

The following PDFs are proposed to be incorporated in to the project description and were used in the environmental analysis with respect to determining land use consistency and compatibility with existing neighboring land uses.



PDF I-1. The Proposed Project shall be developed in accordance with the Development Standards and Design Guidelines of the Hollywood Park Specific Plan.

PDF I-2. The Proposed Project shall be developed in accordance with the provisions set forth under the Hollywood Park Specific Plan, including the final adopted version(s) of the Preliminary Land Use Plan and Preliminary Building Height Limit Map.

In addition to the above, the Proposed Project includes a number of PDFs intended to reduce or avoid water quality and hydrologic impacts. For a list of water quality and hydrology-related PDFs, see Section IV.F, Hydrology/Water Quality, of this EIR.

## **MITIGATION MEASURES**

The following mitigation measure is recommended to reduce the Proposed Project's impacts to adopted land use plans.

MM I-1. Proposed residential uses, including those that fall within the Airport Influence Area's 65 dBA CNEL contour, shall be developed in a manner that achieves a 45 dBA interior noise level. A qualified noise consultant shall complete an exterior to interior noise analysis during the ministerial building permit stage in conformance with the California Building Code, Title 24, Section 1207 to ensure that interior noise levels are at or below 45 dBA CNEL.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With respect to threshold question (a), the Proposed Project, including the proposed Equivalency Program would not physically divide an established community. Therefore impacts would be less than significant.

With respect to threshold question (b) the Proposed Project, including the proposed Equivalency Program, would not substantially conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. With approval of the requested discretionary actions and adoption of the required findings, as recommended in the mitigation measure above, the Proposed Project's impacts related to land use plans, policies, and zoning would be reduced to less-than-significant levels.

With respect to the Proposed Project's and the proposed Equivalency Program's potential to result in urban decay or blight, there is no foreseeable possibility that development of the Project would seize significant amounts of sales from existing or other planned retail developments, and therefore it will not lead to the chain reaction of events that could lead to "urban decay" (i.e., disinvestment, store closures, abandonment and resulting blight).

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**1. WATER**

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**INTRODUCTION**

This section addresses the potential environmental impacts associated with the provision of potable and reclaimed water to the Proposed Project. The Proposed Project is located within the City of Inglewood Water Service Area and therefore the City of Inglewood will provide water to the Hollywood Park Redevelopment Project. In accordance with California regulations, the City of Inglewood has prepared a Water Supply Assessment (WSA) to evaluate the Project's anticipated water demand compared to the City's water supplies during normal water and dry water years. The WSA is discussed in detail below, and is attached in its entirety as Appendix F-6 to this Draft EIR.

**ENVIRONMENTAL SETTING**

**Regulatory Setting**

*Urban Water Management Planning Act*

The State of California recognizes that the waters of the state are a limited and renewable resource. The State also understands that the conservation and efficient use of urban water supplies are of statewide concern, but the planning and implementation of water management programs can best be accomplished at the local level. As a result, the California Urban Water Management Planning Act (Act) was established in 1983. The Act has subsequently been amended and is included in Division 6 of the California Water Code, Part 2.6 Urban Water Management Planning, Sections 10610 through 10657.

One of the Act's primary goals is to encourage urban water suppliers to develop long range plans in an effort to ensure appropriate levels of reliability in their water service during normal, dry, and multiple dry water years. Thus, in accordance with the Act, urban water suppliers are required to develop water management plans to actively pursue the efficient use of available supplies. Specifically, the act requires that urban water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (AF) of water annually prepare and adopt an Urban Water Management Plan (UWMP) addressing the prescribed elements, contained in the Act.

The Act also addresses the public health issues pertaining to water contamination and implementing effective water management strategies, including groundwater storage projects and recycled water projects. The Act recognizes that water quality regulations are becoming an increasingly important factor in water agencies' selection of raw water sources, treatment alternatives and modifications to existing

treatment facilities, and that changes in drinking water quality standards may impact the usefulness of water supplies and may ultimately impact supply reliability.

In accordance with the Act, the State legislature identifies the State policy as follows:

- a.) The management of urban water demands and efficient use of water shall be actively pursued to protect both the people of the state and their water resources.
- b.) The management of urban water demands and efficient use of urban water supplies shall be a guiding criterion in public decisions.
- c.) Urban water suppliers shall be required to develop water management plans to actively pursue the efficient use of available supplies.

It is clear through ever-increasing changes to the Act and other legal actions that the UWMP is becoming a more vital plan by which urban water suppliers must rely for their present and future water planning needs and planned development.

According to the California Department of Water Resources (DWR), the UWMP is considered to be a source of information for WSAs and written verifications of water supply required by recent legislation. In addition, an UWMP may serve as a long-range planning document for water supply, a source of data for development of a regional water plan, and a source document for cities and counties as they prepare their General Plans.

### ***West Coast Basin Judgment***

The West Coast Basin Judgment (Judgment) ultimately was the result of the litigation California Water Service Company, et al. vs. City of Compton, et al. in July 1961, and a subsequent Amended Complaint involving several parties. The Superior Court of the State of California provided a decision including Findings of Fact and Conclusions of Law and Judgment, to which further amendments have been made.

The Judgment defines the boundaries of the West Basin, declares adjudicated water rights, discusses transferable rights, and addresses the issues of water rights carryover, excess production, drought carryover, exchange pools, and water basin replenishment. The Judgment also stipulates the appointment of the Watermaster to administer and enforce the provisions of the Judgment. The most recent Watermaster Service Report is for July 1, 2006 - June 30, 2007.

### ***Pertinent Legislation***

#### ***Senate Bill (SB) 610***

In 2001, the California State Legislature approved Senate Bill 610 (SB 610), which amended Sections 10910-10915 of the State Water Code to require a city or county to identify any public water system(s) that may supply water for the project and to request those public water systems to prepare a specified

water supply assessment, except as otherwise specified. The amended water Code requires the assessment to include, among other information, an identification of existing water supply entitlements, water rights, or water service contracts relevant to the identified water supply for the Proposed Project and water received in prior years pursuant to those entitlements, rights, and contracts.<sup>1</sup> Section 10912(a) of the State Water Code defines a “project” for purposes of determining whether a Water Supply Assessment would be required as:

- (1) A proposed residential development of more than 500 dwelling units.*
- (2) A proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.*
- (3) A proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.*
- (4) A proposed hotel or motel, or both, having more than 500 rooms.*
- (5) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.*
- (6) A mixed-use project that includes one or more of the projects specified in this subdivision.*
- (7) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.*

As the Proposed Project includes the development of 2,995 dwelling units and 620,000 sf of retail space, 75,000 square feet of office/commercial space, and a 300-room hotel, a Water Supply Assessment is required for the proposed development.

#### *Senate Bill (SB) 221*

SB 221 (California Government Code Section 66473) passed the legislature in 2001. This code requires that the water supplier verify in writing that a sufficient and reliable water supply will be available prior to completion for development projects consisting of more than 500 housing units, or in smaller developments if the project represents 10 percent or more of the total number of service connections if the water purveyor has fewer than 5,000 connections. Certain types of projects, including affordable housing projects may be exempt. Prior to approving a proposed subdivision, a city or county must make a finding

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<sup>1</sup> *Senate Bill 610, Legislative Counsel’s Digest, website: [http://www.groundwater.water.ca.gov/docs/sb\\_610\\_bill\\_20011009\\_chaptered.pdf](http://www.groundwater.water.ca.gov/docs/sb_610_bill_20011009_chaptered.pdf), accessed October 4, 2006.*

that there is enough water to serve the project during average, dry, and multiple dry water years without affecting existing and projected water customers. Valid water entitlements, water infrastructure financing, and all major permits and approvals must be in place to justify sufficient water supply.

### *City of Inglewood 2005 Urban Water Management Plan (UWMP)*

The first water system in the City was built by the Centinela-Inglewood Land Company in 1888 to serve the new town of Inglewood. The Inglewood municipal water utility was created in 1920. In response to the Urban Water Management Planning Act, the City of Inglewood submitted its first UWMP to the California Department of Water Resources (DWR) in 1985, and updated Plans were submitted in 1990, 1995, 2000 and 2005 as required by the Act. In 2003, the City also completed the 25-year Water Master Plan. The 2005 Plan reflects accomplishments since the last plan and identifies additional and modified programs to effect enhanced water reliability planning. The 2005 UWMP contains information on the following:

- Water Utility Information;
- Plan Preparation and Public Participation;
- Climatology;
- Comparison of Existing and Projected Water Supply Sources versus Existing and Projected Water Use;
- Assessment of the Reliability of Suppliers' Water Service to Its Customers During Normal, Dry, and Multiple Dry Water Years;
- Wastewater and Recycled Water Description Including Its Potential for Use as a Water Source in the Service Area;
- Urban Water Shortage Contingency Plan Components;
- Description of Suppliers' Water Demand Management Measures Under Current Implementation or Scheduled Implementation, Including Steps to Implement Proposed Measures; and
- Evaluation of Each Water Demand Management Measure that Is Not Currently Being Implemented or Scheduled for Implementation.

In accordance with the California Water Code, Section 10910 (c), the City is required to determine whether the projected water demand associated with a proposed project was included as part of the most recently adopted UWMP. If the projected water demand associated with the proposed project was accounted for in the most recently adopted UWMP, the City may incorporate the requested information from the UWMP in preparing the elements required in the water supply assessment.

In the City of Inglewood 2005 UWMP, estimated water demands were included for three potential development projects within the City, and were included in the analysis of normal and single dry water year's projections to 2030 and multiple dry water years to 2025. The three development projects included

in the 2005 UWMP were Haagan, Renaissance and Bay Meadows (now called Hollywood Park). As such, this water supply assessment incorporates data and analysis information from the 2005 UWMP.

As discussed in the 2005 UWMP, the City meets water demand by using groundwater supplies from its own well systems and purchasing water from outside sources.

The well water is produced from City-owned wells that pump groundwater from the West Coast Basin up to the maximum allowable extraction for each year. The City currently has 4,449.89 AF of water rights annually. Originally, through adjudication of the West Coast Basin, the City was entitled to 4,382.00 AF per year of water rights. Subsequently, the City has purchased water rights from several sources, including Frank Abell, Boise Cascade Building Co., Georgia Pacific Corp., Kaufman, Leo and Sheldon Baer, and George R. Murdock for an additional amount of 67.89 AF per year.

Generally, the maximum allowable extraction is the total amount of water rights owned by the City, plus any carryover of unused water rights from the previous year, plus any net leases or exchange of water rights per agreements. In Fiscal Year 2007, the City had 4,449.89 AF of water rights, plus a carryover of 788.94 AF of water rights, plus a net lease exchange of 282.00 AF of water rights for a total allowable extraction of 5,520.83 AF. According to the West Coast Basin Watermaster records for FY 2007, the City pumped 3,551.28 AF from groundwater supplies and purchased 7,527.10 AF of imported water.

The City has four wells (wells # 1, 2, 4, and 6) in service and producing water into the system. The City also has two connections with MWD through which it purchases imported water from WBMWD. The City also has six connections to Golden State Water Co. and two connections to the Los Angeles Department of Water and Power, which are used for emergency supplies only.

### ***Global Warming***

On June 1, 2005, Governor Arnold Schwarzenegger issued Executive Order S-3-05, and established greenhouse gas emissions targets for California and required biennial reports on potential climate change effects on several areas, including water resources. The potential effects of increasing atmospheric concentrations of carbon dioxide and other ‘greenhouse gases’ and the observed increase in the average temperature of the Earth’s atmosphere and oceans have been the subject of considerable technical analysis and political debate. The natural phenomena (e.g. temperature, rainfall) that together form the climate of a particular region vary from day-to-day and year-to-year. The variation in climate can be a result of natural, internal processes or in response to external forces from both human and non-human causes, including solar activity, volcanic emissions, and greenhouse gases.

Although experts generally agree that the earth’s atmosphere has warmed over the last century and will likely continue to warm in the future, there is substantial uncertainty as to how this warming will quantitatively affect future water supplies, and specifically, how this warming will affect SWP supplies. The California Department of Water Resources (DWR) is the state agency charged with the statutory responsibility to build, manage, and operate the SWP. DWR, as the owner and operator of the SWP and

the agency with a statewide perspective and most relevant technical expertise, is in the best position to determine the effects of global warming on SWP supplies.<sup>2</sup>

In June 2006, DWR published a Technical Memorandum Report entitled *Progress on Incorporating Climate Change into Planning and Management of California's Water Resources* in response to the Executive Order (DWR 2006a). The Report describes progress made incorporating climate change into existing water resources planning and management tools and methodologies. Some preliminary results on the potential effects of climate change are presented. While the analyses presented in the Report used the most current scientific techniques and were reviewed by experts, all of the results are preliminary. The Report incorporates several assumptions, reflects a limited number of climate change scenarios, and does not address the likelihood of each scenario. Policy implications of climate change and recommendations to respond to the future demands for water are identified as beyond the scope of the Report. The Report acknowledges that there are substantial uncertainties regarding the effects of global warming on SWP supplies and suggests additional analysis to reduce this uncertainty.

Regarding the purpose and use of the Technical Memorandum Report in the analysis of climate change, the Technical Memorandum Report states that:

“The purpose of this report is to demonstrate how various analysis tools currently used by DWR could be used to address issues related to climate change. The methods and results presented in this report could be used to guide future climate change analysis and to identify areas where more information is needed. All results presented in this report are preliminary, incorporate several assumptions, reflect a limited number of climate change scenarios, and do not address the likelihood of each scenario. Therefore, these results are not sufficient by themselves to make policy decisions.” (page II).

It is therefore premature to make an assessment of how, for example, snow melt will affect water availability. It is noted that increased use of groundwater storage is a potential strategy identified in the referenced Technical Memorandum Report (Table 2-3) to mitigate potential impacts of global warming.

The 2005 SWP Delivery Reliability Report addressed the need to incorporate some of the uncertainties of global warming with regard to planning and operation of the SWP, and stated that, “Until the impacts of climate change on precipitation and runoff patterns in California are better quantified, future weather patterns are usually assumed to be similar to those in the past, especially where there is a significant historical rainfall record.”

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2 The Los Angeles Superior Court recently issued a statement of decision (Case No. BS 084677) on August 15, 2007, which upheld the City of Santa Clarita's Return to a Writ of Mandate and Final Additional Analysis to an EIR for a local development project. The court stated that DWR has the most expertise on water supplies in California, DWR has determined that the science on global warming has not reached a point where it can be quantified and incorporated into delivery projections of the SW and CEQA does not require the City to undertake such an analysis.

DWR is actively engaged in developing a set of water management policies that will provide a comprehensive approach to climate change. The science regarding global warming is still evolving and policy recommendations on how to incorporate potential changes to water supply due to climate change are being developed. However, the importance of conservation and maintaining a reliable water supply in the context of global warming is recognized by DWR and water planners.

The Global Warming Solutions Act of 2006 (Health and Safety Code Sections 38500 *et seq.*) requires the California Air Resources Board (CARB) to adopt regulations requiring monitoring and annual reporting of greenhouse gas emissions from the most important sources or categories of sources. By January 1, 2011 CARB must establish greenhouse gas emissions limits and emission reduction measures necessary to achieve the 1990 levels by 2020.

As discussed above, it is anticipated that California agencies will more precisely quantify impacts of climate change in various regions of the State and that DWR will formalize anticipated effects of climate change on water supply. Once DWR provides this assessment, it may be used by local water agencies to determine to what extent the supplies will be affected by global climate change impacts. As DWR develops more specific assessments of the potential effects of climate change on SWP delivery reliability and water demands, local purveyors can update their plans accordingly.

### ***2005 UWMP Water Supply Analysis***

The City of Inglewood 2005 UWMP provides a water supply analysis for normal and dry water years through the year 2030 by presenting a comparison of projected water supply and demand.

In normal water years, the 2005 UWMP indicates that projected demands through 2030 can be met based upon the projected supplies, except in 2030 when the City may have to purchase approximately 1.9% of additional supplies.<sup>3</sup>

In a single dry water year, the 2005 UWMP indicates that the City would have sufficient supplies to meet demand based upon the comparison of the supply and demand for a projected single dry water year through 2030, using the assumptions in the report.<sup>4</sup>

During multiple dry water years, the 2005 UWMP indicates that the City would have sufficient supplies to meet demand based upon the comparison of the supply and demand for projected multiple dry water years through 2025.<sup>5</sup>

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<sup>3</sup> See Tables 11, 12, and 13 of Section VI of the 2005 UWMP. (The 2005 UWMP is appended to Appendix F-6 of this EIR.

<sup>4</sup> See Tables 14, 15 and 16 of Section VI of the 2005 UWMP.

<sup>5</sup> See Tables 17 through 28 of Section VI of the 2005 UWMP.



These conclusions are based upon available data at the time of preparation of the report in 2005, and based upon the assumptions outlined in the text of the 2005 UWMP, including water conservation and assuming the long-term availability of imported water supplies from West Basin Municipal Water District (WBMWD).

The 2005 UWMP clearly states that in the past, in single dry water years or multiple dry water years, the City was able to meet demand by purchasing additional water from WBMWD as needed; but in the future, the City may not be able to meet demand in single dry water years or multiple dry water years if regional agencies are unable to supply sufficient supply to all its member agencies.

The 2005 UWMP also clearly states that the City must continue to evaluate, upgrade and maximize its own groundwater supply sources and implement water treatment as needed. The City must look toward the future and secure alternate sources of supply from other cities or agencies. This requires long-term agreements with agencies to ensure that alternate supplies are available when needed in accordance with those agreements, even if it is for emergency supplies only.

#### *Water Conservation*

In addition, the City must also make every effort to educate the public in the wise use of water in order to maintain sufficient supply. The City must aggressively promote water conservation in all sectors of the community. The City must continue to upgrade its water system infrastructure, through implementation of its Capital Improvement Plan, to minimize water system loss and maximize efficiency.

The City has also demonstrated that it will not hesitate to implement voluntary conservation measures or mandatory reductions if the need arises. This is demonstrated by the adoption of ordinances, which require specific action on the part of all water users to reduce water consumption during declared water shortages.

In May 1990, the City adopted Resolution No. 90-45 encouraging water conservation practices by all water users. The resolution declared that a water shortage exists and requests and encourages all water users to reduce water use by 10%, as compared to 1989. This voluntary measure discouraged wasteful water practices, including hosing walkways and other hard surfaces, washing of vehicles without use of a hose, cleaning and filling of non-recirculating decorative fountains, watering landscape between 7:00 am and 7:00 pm, and serving water in restaurants unless requested. A copy of Resolution No. 90-45 is located in Appendix I of the 2005 UWMP.

The following year, in March 1991, the City adopted Ordinance No. 91-6 declaring a water shortage and adopting mandatory water conservation practices. The ordinance includes many of the same provisions as contained in the voluntary resolution plus additional water waste practices, and including a provision for penalties for failure to comply. Ordinance No. 91-6 is described in detail in section VIII Water Shortage Contingency Planning of the 2005 UWMP. A copy of Ordinance No. 91-6 is located in Appendix J of the 2005 UWMP.

In July 1993, the City adopted Ordinance No. 93-20 amending the municipal code to provide for water efficiency in the landscape, and further restricting the use of water in a wasteful manner. Ordinance No. 93-20 is also described in more detail in section VIII Water Shortage Contingency Planning. A copy of Ordinance No. 93-20 is located in Appendix K of the 2005 UWMP.

Notwithstanding the overall favorable conclusions in the 2005 UWMP, the plan indicates that long-term supplies of imported water supplies from WBMWD cannot ultimately be guaranteed. Accordingly, the 2005 UWMP recommends upgrading the water system infrastructure, including the addition of new wells, back-up power and system redundancy, and increasing the use of reclaimed water where applicable in order to help the City to achieve the objective of reducing imported supplies.

### *Statewide Drought*

On June 4, 2008, California's Governor issued Executive Order S-06-08, a Statewide Drought Declaration, dealing with current water shortages and voluntary water conservation measures to be adopted by water purveyors throughout the state. Executive Order S-06-08 includes a wide variety of measures to help facilitate drought response by DWR and Department of Public Health, include the following exemplary orders:

- expedite existing grant programs for local water districts and agencies for water conservation programs and projects;
- facilitate water transfers in 2008 and prepare to operate a dry year water purchasing program in 2009;
- conduct an aggressive water conservation and outreach campaign;
- convene the Climate Variability Advisory Committee to prioritize and expedite drought-related climate research;
- provide technical assistance for drought response;
- review the water shortage contingency elements of UWMPs and work cooperatively with water suppliers to implement improvements;
- prioritize processing of loans and grants for water suppliers demonstrating hardship;
- identify public water systems at risk of health and safety impacts;
- review mutual aid agreements among large water purveyors;
- identify potential federal funding for local water agencies and farmers; and
- gather data on crop losses and economic impacts; and work with local water agencies to reduce water consumption locally.

*Imported and Groundwater Supplies*Imported Supplies

The City's imported water supplies are provided through the West Basin Municipal Water District (West Basin), which in turn secures its imported water from sources including the Metropolitan Water District (MWD). A letter relating to water supply reliability issues was prepared at the City's request, dated July 7, 2008, to address the current and future actions by West Basin to further the long-term reliability of water supplies to the City. (See Appendix F-6 to this EIR). It was acknowledged in the letter, "that the City has demonstrated leadership in responsible water management, most recently with the adoption of the 'It's time to Get Serious,' resolution to raise awareness of current water supply challenges and a commitment to review water use efficiency ordinances."

The letter also notes that West Basin has developed a model water conservation ordinance, which contains the following four primary actions, which will have a positive affect on water reliability in the West Coast Basin:

- a. Phase V Expansion of the Edward C. Little Water Recycling Facility to increase high purity recycled water for injection at the West Coast Seawater Barrier from 12.5 million gallons per day (mgd) to 17.5 mgd, replacing the remaining 5 mgd of imported water used for that purpose.
- b. Additionally West Basin is in the process of the conversion of the Dominguez Gap Seawater Barrier from imported water to recycled water sources. At this writing 2 mgd has been converted by the City of Los Angeles, and it is anticipated that within 10 to 20 years all injection water (11 mgd) will be high purity recycled water; thus freeing up a considerable amount of imported water for direct domestic uses.
- c. West Basin notes that, "With the completion of the Phase V and future projects, all replenishment of the West Coast Basin, the source of the City's groundwater production, will be immune to drought and other supply challenges."
- d. West Basin notes that, full scale development of ocean-water desalination is planned by 2020 to replace up to 20 million gallons per day of imported water with a locally produced, drought-proof, potable water source. At this writing, the design of a temporary demonstration desalination facility is underway.
- e. West Basin is planning aggressive implementation of their Conservation Master Plan, which intends to double the amount of water conserved by 2020.
- f. West Basin intends to participate in planned groundwater conjunctive use programs as they may occur through the current policy framework agreed to by the West Basin stakeholders. Application of this program could allow for the increased storage of high-purity recycled water through an amendment to the West Coast Basin Judgment.

In summary West Basin notes: “Through implementation of these actions, West Basin will meet 60% of the service area needs through conservation and locally-controlled supply sources by 2020, compared to roughly one-third today.”

In its letter, West Basin also notes that the West Basin recycled water system is ready to serve the proposed Hollywood Park Development, noting their commitment to irrigate common landscape areas with recycled water. West Basin also commits to assisting Hollywood Park with ensuring that financial incentives and other assistance is offered for high-efficiency conservation devices for indoor and outdoor application in the development.

Reference is made to the State of California Department of Water Resources’ issuance of the Draft State Water Project Delivery Reliability Report, on January 22, 2008. The report indicates that the State’s water supply would be impacted by climate change as well as reductions in State Water Project (SWP) water delivered due to pumping restrictions in accordance with the December 2007 federal court order imposing interim rules to protect the delta smelt.

As further discussed below, the MWD has issued a news release to its member agencies in March 2008 indicating as much as a 30% reduction in wholesale water supplies from Northern California because of court-imposed pumping restrictions. The 2005 UWMP was prepared prior to the development of this issue and it is unclear at this time what the specific impacts of curtailed imported water supplies may be. Notwithstanding, the Hollywood Park Redevelopment Project would be responsible for providing sufficient water supplies to meet its water demand. What the 30% reduction issue does potentially dictate is the source of the required demand. It almost assuredly requires that the proposed water demand come from groundwater sources, because imported supplies cannot be relied upon.

#### ***U.S. District Court Rules that a New Biological Opinion on SWP Operations in the Delta is Needed***

The precise amount of water that MWD will be able to supply to Southern California in the near future is unclear given the recent federal court decision *Natural Resources Defense Council, et al. v. Kempthorne, et al.* (“NRDC”). In Spring 2007, various environmental groups sought to halt the operation of water pumps in the Sacramento-San Joaquin River Delta (the “Delta”) to protect the Delta smelt and other endangered fish species living in the Delta. In May 2007, a federal court invalidated the Biological Opinion issued by the U.S. Fish & Wildlife Service, which had held that the Delta smelt were in “no jeopardy” from operational changes of the SWP in the Delta. DWR and the U.S. Bureau of Reclamation are currently working with the U.S. Fish & Wildlife Service to prepare the new biological opinion. On May 31, 2007, the California Department of Water Resources (“DWR”) voluntarily shut down SWP pumps for 17 days in an effort to protect the Delta smelt. In an August 2007 oral decision, the same federal court agreed to institute interim protective measures that restrict water operations in the Delta, including reducing the amount of water being pumped out of the Delta between the end of December and June.

At this time, the full extent of the impact on MWD’s ability to supply water to Southern California is still uncertain. However, these events have highlighted the challenges that water suppliers throughout the

state currently face regarding supplies from the Delta. MWD obtains approximately 1.2 million acre feet of water from the State Water Project. With this oral decision by the federal court, this amount of water received from the State Water project is anticipated to be decreased by approximately 15 to 30 percent.

Restoring the Delta's water capacity is a high priority for MWD, the Governor and the California Legislature; extensive plans are already underway for improving the operation of the Delta's water pumps while also protecting the Delta smelt and other endangered fish species.<sup>6</sup> In June 2007, MWD's Board of Directors adopted an Action Plan to implement immediate short-term actions to stabilize the Delta and mid-term and long-term actions to find an ultimate solution to the Delta's sustainability. The Governor has made the Delta and statewide water policy a high priority by establishing the Delta Vision Process and the Bay-Delta Conservation Plan, and the California Legislature is using SB 27 to find a long-term water supply solution for the Delta. As a result of these plans, MWD's water supply may be restored to previous levels in the next few years.

In response to recent developments in the Delta, MWD is also engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies. In the near-term, MWD will continue to rely on the plans and policies outlined in its Regional Urban Water Management Plan ("RUWMP") and Integrated Water Resources Plan to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands. Campaigns for voluntary conservation, curtailment of replenishment water and agricultural water delivery are some of the actions outlined in the RUWMP. If necessary, reduction in municipal and industrial water use and mandatory water allocation could be implemented. There are currently no restrictions on the City of Inglewood's ability to purchase imported water.

### *Water Rights*

A letter confirming the water rights held by both the City of Inglewood and Hollywood Park Land Company LLC was requested from the State of California, Department of Water Resources (DWR), Southern District who serves as the West Coast Basin Watermaster (Watermaster). A letter, dated July

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<sup>6</sup> *The Governor previously initiated a comprehensive Delta Vision process and, by Executive Order S-17-06, appointed a Blue Ribbon Task Force to recommend future actions that will achieve a sustainable Delta. In December of 2007, the Delta Vision Blue Ribbon Task Force submitted to the Governor its final report, "Our Vision for the California Delta," which included 12 linked recommendations and several proposed near-term actions to protect the Delta ecosystem and the state's water supply. Among the 12 Integrated and Linked Recommendations ([http://deltavision.ca.gov/BlueRibbonTaskForce/FinalVision/Vision\\_2\\_Page\\_Summary.pdf](http://deltavision.ca.gov/BlueRibbonTaskForce/FinalVision/Vision_2_Page_Summary.pdf)) is the recommendation that the goals of conservation, efficiency and sustainable use must drive California water policies. In addition, the recommendations include that a revitalized Delta ecosystem will require reduced diversions, or changes in patterns and timing of those diversions, upstream, within the Delta and exported from the Delta at critical times. The near-term actions included in the report focus on preparing for disasters in or around the Delta, including emergency flood protection, and making immediate improvements to protect the environment and the system that moves water through the Delta. The complete report is accessible at [http://deltavision.ca.gov/BlueRibbonTaskForce/FinalVision/Delta\\_Vision\\_Final.pdf](http://deltavision.ca.gov/BlueRibbonTaskForce/FinalVision/Delta_Vision_Final.pdf). A Strategic Implementation Plan is to be completed by the Blue Ribbon Task Force by October of 2008.*

21, 2008, was received from the Watermaster, which sets forth the following documentation regarding the above referenced water rights:

- a. The City of Inglewood currently has 4,449.89 acre-feet of Adjudicated Rights in the West Coast Basin annually.
- b. Hollywood Park Land Company, LLC currently has 282.00 acre-feet of Adjudicated Rights in the West Coast Basin annually.

A breakdown and detailed discussion of the origin of these Adjudicated Rights for both parties is set forth in the Watermaster's letter. (See Appendix F-6 to this EIR)

Recently in an environmental process being performed by a city in the Central Basin, the Tongva Ancestral Territorial Tribal Nation claimed to have water rights in that Basin. The Central Basin Watermaster in a letter to that city, dated April 30, 2008, indicated the following in that regard:

"Watermaster files have no records showing that the Tongva Ancestral Territorial Tribal Nation ever had or currently has water rights in the Central Basin."

#### *Groundwater Supplies*

A letter dated July 23, 2008 was sent to the City of Inglewood from The Water Replenishment District of Southern California (WRD) in regards to the replenishment, protection and preservation of groundwater supplies and quality in the West Coast Basin (See Appendix H). WRD notes in its letter that, "The West Basin is an adjudicated basin and therefore all pumpers in the Basin(which include the City of Inglewood and Hollywood Park) have the authority under the West Basin Judgment to pump their adjudicated rights."

WRD notes that the natural inflow to the West Basin comes from inflow from the Central Basin to the east and other basins as well as from surface inflow into the upper aquifers during rainfall events. The following is an excerpt from the letter explaining the current and future storage within the West Basin.

The natural safe yield is estimated to be 26,500 acre-feet / year. The managed safe yield of 64,468.25 is substantially higher than the natural safe yield. The higher yield is possible because of the artificial recharge maintained by the WRD. It has been one of the District's main responsibilities since 1959 to help make up the annual overdraft by providing artificial replenishment water to recharge the aquifers and supplement natural recharge. Artificial replenishment occurs in the West Coast Basin by fresh water being injected at two seawater intrusion barriers. Although the primary purpose of the barriers is for seawater intrusion control, groundwater replenishment also occurs as the fresh water is injected into the aquifers and then moves inland towards pumping wells.

The barriers are supplied by a blend of imported and recycled water. Over the last 10 years, the barrier water supply has shifted from imported to recycled water. The West Coast Barrier is currently a 75/25 blend of recycled/imported water, but working with the West Basin MWD, WRD plans to use 100%

recycled water once the Phase V Expansion of the Edward C. Little Water Recycling Facility is complete. Similar conversions to 100% recycled water are planned for the Dominguez Gap Barrier. With the completion of Phase V and future barrier water supply projects, all replenishment of the West Coast Basin, the source of the City's groundwater WRD is also considering the use of physical barriers in addition to injection wells to preclude seawater intrusion into the basin.

Furthermore, groundwater storage opportunities are being developed that will increase water in storage and improve supply reliability to the West Coast groundwater basin.

In summary WRD is managing the West Basin groundwater supply through its replenishment, monitoring and groundwater activities. Historically, the groundwater levels in the basin have remained fairly constant. With our shift to more recycled water for supply to the seawater intrusion barriers and the establishment of groundwater storage in the basin, groundwater supply reliability will continue to improve.

In order to be able pump its adjudicated rights, the City must continue to provide WRD with payments of its Replenishment Assessment (RA), which is contingent with the City's right to pump groundwater.

#### *Recycled Water Supply*

The WBMWD currently practices water reclamation and conservation efforts in the area, including the provision of reclaimed water infrastructure in the City of Inglewood. West Basin also purchases effluent from the City of Los Angeles operated Hyperion Treatment Plant that has received secondary treatment and treats it to a minimum of tertiary treatment in order to meet State requirements. The City has been purchasing recycled water from WBMWD Water Recycling Plan in El Segundo since 1995. The City of Inglewood has 16 connections to WBMWD's recycled water system. In FY 2007, the City purchased 797.06 AF of recycled water to supply landscaping water needs for several consumers.

#### *City of Inglewood Municipal Code*

Municipal Code Section 5-112 (Water Efficiency in the Landscape) establishes procedures and standards for the design, installation, and maintenance of water-efficient landscapes in conjunction with new construction projects within the City. The Code promotes the conservation and efficient use of water within the City in order to prevent the waste of water resources (Municipal Code Section 3.1-10.).

#### *Local Water Infrastructure*

##### *Potable Water Lines*

The Proposed Project is located within the WBMWD's Water Service Area, within the jurisdictional boundaries of District No. 5, and is adequately served by existing water mains. The City's water service area covers approximately 4,600 acres within the City's boundaries. Water is provided by the City's system to approximately 84 percent of the residences and businesses in the City. The City's water service in 2005 included a population of approximately 98,714 residents through 14,818 connections. However,

based on water pressure zoning designations, approximately 18,625 residents (approximately 16 percent of the City population) in the City receive water service from other agencies. The City's service area is divided into three distinct pressure zones because of the elevation differences that vary from 60 to 247 feet above mean sea level (msl). The Project Site is located in Zone 2.<sup>7</sup>

Water infrastructure within the City and within the project vicinity consists of 3-inch to 30-inch cement-lined water mains. Figure IV.J-1, Existing Water Infrastructure depicts the location of existing local water lines serving the Project Site and immediately surrounding area. As shown in Figure IV.J-1, the Project Site is served by an existing 8" City of Inglewood water main located beneath Prairie Avenue (with a service connection at Arbor Vitae), a 12" City of Inglewood water main located beneath Century Boulevard (with a 10" water service connection at Yukon Avenue), and a 20" main line located beneath Pincay Drive (W. 90<sup>th</sup> Street). The existing potable and recycled water infrastructure that currently exists within the immediate project vicinity is summarized in Table IV.J-1, below.

#### *Reclaimed Water Lines*

Based on available record drawings reviewed to date, the Project Site is served by an existing 36" conveyance pipe that runs along Prairie Avenue. This line serves the Project Site through an existing 4" recycled water meter/connection located at Hardy Street.

Future disinfection stations are planned to be installed, on 120<sup>th</sup> St. and/or Prairie Av. & 102<sup>nd</sup> St, by WBMWD to improve recycled water quality. This is due to extended retention times and elevated ammonia levels within the existing 36-inch main running north below Prairie Avenue as a result of insufficient usage. Current demand for recycled water is low, and is primarily only used for irrigation purposes within parks, public-street parkways, golf-courses, and private Home Owner Association maintained landscapes. Potential Inglewood customers within the project area are currently identified as being Darby Park, Briarwood and Homestretch & Renaissance along W. 90<sup>th</sup> St./Pincay.

The Project Site consists of approximately 238 acres, including a racetrack, turf course, two large infield lakes, and associated racetrack facilities. Recent historical water demand (Fiscal years 2003-2007) for the Project Site shows an average of 359.96 AF/Y (321,352 gallons per day).<sup>8</sup> (See Table IV.J-2, Estimated Potable Water Demand for Proposed Project). Hollywood Park Racetrack and Casino currently has an adjudicated water right of 282 AF/Y (251,753 gallons per day).<sup>9</sup> There are no current deficiencies in the water service system in the vicinity of the Proposed Project.<sup>10</sup>

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<sup>7</sup> *City of Inglewood General Plan Update Technical Background Report 2006, Section 3.1 Water System.*

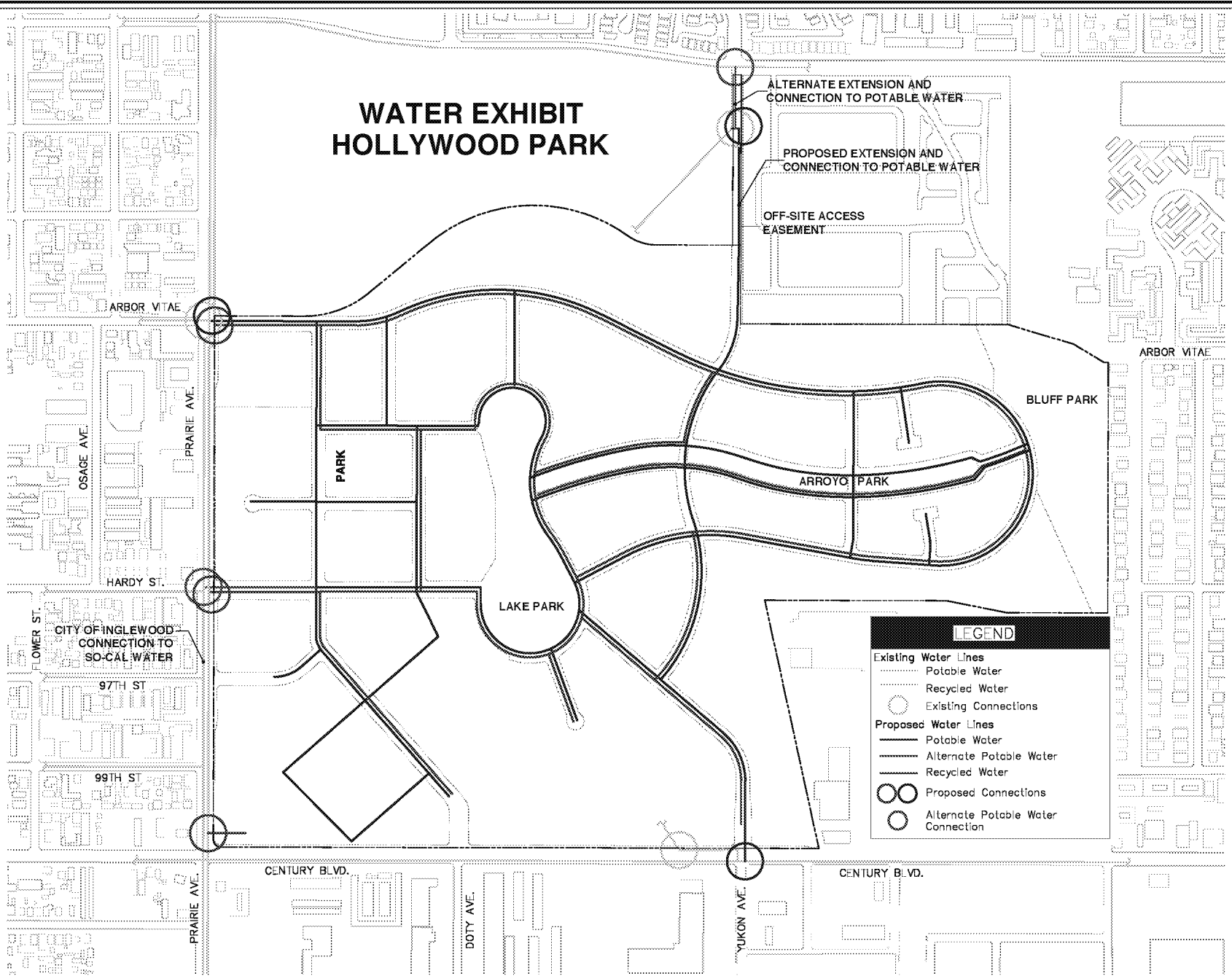
<sup>8</sup> *See Appendix F-6 to this Draft EIR, WSA, Section F.*

<sup>9</sup> *WSA and attached letter from Department of Water Resources, dated July 21, 2008. See Appendix F-6 to this Draft EIR.*

<sup>10</sup> *City of Inglewood General Plan Update Technical Background Report 2006, Section 3.1 Water System.*



# WATER EXHIBIT HOLLYWOOD PARK



Source: Hall & Foreman, Inc. June 23, 2008.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research



Figure IV.J-1  
Existing and Proposed Water  
Infrastructure Map

**Table IV.J-1  
Existing Water Infrastructure Serving the Project Site**

Location	Size	Notes
<b>Water</b>		
Prairie Avenue	City of Inglewood 8" to 10" C.I., LADWP 60" Concrete, 8" SoCal Water connect to 8" Inglewood at Century Blvd	Service meter at Arbor Vitae Existing 2" domestic feed
Century Boulevard	LADWP 36" Steel, 54" Concrete, City of Inglewood 6" A.C.	Service meter at Yukon Avenue Existing 10" domestic feed
W. 90 <sup>th</sup> St/Pincay	City of Inglewood 24" RCCP and 24 PCC	Service meter at Carlton Dr. Existing 8" and 10" domestic feeds
<b>Recycled Water</b>		
Prairie Avenue	36-inch	Existing 4-inch meter/connection to Hollywood Park site along Prairie Avenue near Hardy Street
<i>Source: Hall and Foreman, Inc. June 23, 2008.</i>		

### *Fire-Flow*

The City of Inglewood receives fire protection services from the Los Angeles County Fire Department (LACoFD). In accordance with County of Los Angeles Fire Department fire flow availability tests were undertaken at the site by the City of Inglewood on December 11, 2006.<sup>11</sup> The tests were to ascertain a fire flow at 20-psi for in excess of a 3-hour duration. The results were as follows:

- Hollywood Park: Century Bl. & Club Dr., 12-inch water main, static pressure 104-psi, residual pressure 98-psi, fire flow @ 20 psi for 3 hrs.: 6,009-gpm;
- Hollywood Park: Prairie Ave. & La Brea Dr., 10-inch water main, static pressure 75-psi, residual pressure 70-psi, fire flow @ 20 psi for 3 hrs.: 4,665-gpm;
- Hollywood Park: Pincay & Prairie, 24-inch water main, static pressure 71-psi, residual pressure 67-psi, fire flow @ 20 psi for 3 hrs.: 5,139-gpm.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if:

<sup>11</sup> County of Los Angeles Fire Department, Fire Prevention Division, Information on Fire Flow Availability for Building Permit, Fax date: December 14, 2006 (See Appendix F-5: Service Provider Responses).

- (a) A project would require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause a significant environmental effect; or
- (b) If there were insufficient water supplies available to serve the project from existing entitlements and resources, or new or expanded entitlements were needed.

## **Project Impacts**

### *Construction*

Construction of the Proposed Project will utilize water for various construction activities including watering the site for soil compaction and dust suppression purposes as well as cleaning construction equipment and surface areas. It is anticipated that the construction related water use would utilize reclaimed water for all construction related purposes. Since the project site is currently served by reclaimed water infrastructure, no new service connections or off-site infrastructure improvements would be required.

The initial filling of the lake will create an increased water demand during the lake filling operations (likely to occur at the end of the construction process). The higher water demand is considered to be short-term and would cease when the lake filling operations end. Accordingly, there is minimal impact on the long-term operational water usage resulting from the lake filing operations. Therefore, construction activities would not impact the local water supply and impacts would be less than significant.

### *Operation*

The proposed development is a "Project" as defined in Section 10912 (a) of the State Water Code, and is thus subject to the provisions for determining water availability as outlined in Section 10910-10915 of the State Water Code. Because the Proposed Project exceeds the 500 dwelling unit threshold; a WSA was requested to determine the City's ability to meet the water demands of this project. The following discusses the methodology used to assess the Proposed Project's water demands in consideration of the existing and planned water supplies available to serve the City of Inglewood service area. A detailed analysis of the projects impacts to the current and future water supplies follows.

### *Estimated Water Demands*

The water demands for the Proposed Project were outlined in a letter report to Wilson Meany Sullivan, LLP dated July 17, 2008 (see WSA, Appendix F-6 to this EIR). The letter report was prepared by Stetson Engineers, Inc. and submitted to the City of Inglewood for review. The water demand for the Proposed Project is based on Stetson's review of the land uses provided in the Hollywood Park Specific Plan, water demand factors for similar types of land uses, and water demand factors for existing land uses in the City of Inglewood as presented in the City of Inglewood's 25 Year Water Master Plan dated September 2003.

Stetson's estimated water demands were approved by the City Engineer and incorporated into the WSA (See Appendix F-6 to this EIR).<sup>12</sup>

As shown in Table IV.J-2, below, the WSA estimates the total projected water demands for the project would be approximately 667,261 gallons per day (gpd), or 747.43 AF/yr. Approximately 575,504 gpd (or 86 % of the Project's total water demand) would serve the Project's residential component. This is an average of 192 gallons per day (gpd)/dwelling unit of residential domestic water demand for the Proposed Project. The results of the analyses were compared to two other developments in Southern California with a similar mix of residential dwelling unit densities and extensive use of reclaimed water. The letter report concludes that the Hollywood Park Redevelopment Project's average water demand factors are similar to the water demand factor of 176 gpd/dwelling unit used in the Draft EIR for the Village at Playa Vista Project located in the City of Los Angeles, and to the water use factor of 180 gpd/dwelling unit developed from existing water uses by the City of Whittier for the water supply assessment for the Uptown Whittier Specific Plan.

**Table IV.J-2**  
**Estimated Potable Water Demand for Proposed Project**

Project Land Use	Quantity	Unit	Demand Factor	Total (GPD)
<b>DOMESTIC WATER</b>				
Mixed Use (R-M)	4.45	AC	5,210 GPD/AC*	23,185
Residential SFD (R-1)	35	DU	336 GPD/DU *	11,760
Residential SFD (R-1.5, R-2, R-2A)	16.35	AC	1,926 GPD/AC *	31,490
Residential TH (R-3)	71.36	AC	5,210 GPD/AC *	371,786
Residential WRAP/PODUIM (R-4, R-M)	26.35	AC	5,210 GPD/AC *	137,284
<b>Subtotal Residential =</b>				<b>575,505</b>
Commercial/Retail	36.36	AC	1,680 GPD/AC *	61,085
Hotel	4.95	AC	1,680 GPD/AC *	8,316
Casino/OTB	5.64	AC	1,680 GPD/AC *	9,475
Civic Use	4	AC	1,680 GPD/AC *	6,720
Lake Water Replenishment	4	AC	1,540 GPD/AC **	6,160
<b>TOTAL DOMESTIC USES =</b>				<b>667,261</b>
<i>Source: Water Supply Assessment and attached letter from Stetson Engineers, Inc., dated July 17, 2008.</i>				

#### *Related Development Project Demand Considerations*

Estimated water demand values were included in the 2005 UWMP projections for three development projects (Haagan, Renaissance and Bay Meadows). The Bay Meadows development project is now called

<sup>12</sup> The July 17, 2008 letter from Stetson estimated that the average existing usage at Hollywood Park is 317 AF/yr. However, recent historical water demand (Fiscal Years 2003-2007), based on data provided by the City, for the existing Hollywood Park Facilities shows an average of 359.96 AF/yr. Thus, the WSA and this EIR uses 359.96 AF/yr in the analysis.

Hollywood Park. Since there was little information on the particulars of the three development projects at the time of the preparation of the 2005 UWMP, preliminary estimates of water demands were made and a total demand for the three developments was assigned for use in the comparison studies. The 2005 UWMP estimated that the three development projects would demand 360.60 AF/yr. Subsequent to the preparation of the 2005 UWMP, two of the three development projects (Haagan and Renaissance Development Projects) have been implemented within the City of Inglewood.

Even though the two developments have only been in operation for a relatively short period of time, there is water usage data available for these projects. This data, plus the water usage data of the existing Hollywood Park facilities, can be used to deduce an estimated amount of water demand that can be attributed to the Hollywood Park Redevelopment Project that was not already accounted for in the 2005 UWMP.

As previously noted, the 2005 UWMP estimated a total water demand of 360.60 AF/yr for all three development projects. Based upon water demand data currently available for the Haagan and Renaissance developments, it is estimated that the Haagan development water demand is 29.53 AF/yr and the water demand for the Renaissance development is 46.76 AF/yr.

Recent historical water demand (Fiscal Years 2003-2007) for the existing Hollywood Park facilities shows an average of 360 AF/yr. The water demand for the existing Hollywood Park facilities would offset (as a credit) the proposed water demands for the Hollywood Park Redevelopment Project, while the water demands of the Haagan and Renaissance developments would reduce the amount of available water attributable to the Hollywood Park Redevelopment Project in the 2005 UWMP.

Comparing the water demand estimated in the 2005 UWMP to the proposed water demands for the two alternatives for the Hollywood Park Redevelopment Project yields the amount of water not accounted for in the 2005 UWMP for the Hollywood Park Redevelopment Project.

Mathematically, this is shown below.

$$\text{Haagan [H]} + \text{Renaissance [R]} - \text{Existing Hollywood Park [EHP]} + \text{Proposed Hollywood Park Redevelopment Project [HPRP]} = \text{The Total Water Demand for All Three Developments}$$

$$\text{For the Hollywood Park Redevelopment Project: } 29.53 \text{ AF/yr [H]} + 46.76 \text{ AF/yr [R]} - 359.96 \text{ AF/yr [EHP]} + 747.43 \text{ AF/yr [HPRP]} = 463.76 \text{ AF/yr}$$

The 463.76 AF/yr is the total projected water demand for the three developments based upon available water usage data and the projected water demand for the Hollywood Park Redevelopment Project. Only 360.60 AF/yr was attributed to the three developments in the 2005 UWMP, leaving a deficit of 103.16 AF/yr. At a minimum, the Hollywood Park Redevelopment Project would be responsible for providing the 103.16 AF/yr to meet its water demand.

Using the additional water demands of 103.16 AF/yr generated by the proposed Hollywood Park Redevelopment Project, a recalculation of the impact of these demands upon the City's water supply

under a normal water year, single dry water year, and multiple water years was conducted. In the analysis, the water supplies were left unchanged from the 2005 UWMP, but the water demand for each scenario (normal water years, single dry water year, and multiple water years) was increased by 103.16 AF/yr. Recycled water demands for the proposed Hollywood Park Redevelopment Project were not added into the calculations because WBMWD has ample available supply to meet the increased recycled water demands as proposed. Whatever recycled water demands that would be added, would be offset by increasing the amount of supply of recycled water by the same amount as the demand yielding a net of zero. Recycled water supply is discussed in further detail below.

Table IV.J-3 shows the water supply and demand comparison for the Proposed Project. The water demand of 103.16 AF/yr (rounded off to 103 AF/yr) was added to the water demand values presented in the 2005 UWMP for the years shown. The results show that there is a deficit of water supply in the later years (2025 and/or 2030) for the normal water year and the multiple dry water years scenarios resulting from the increased water demand associated with the Proposed Project.

**Table IV.J-3  
Water Supply and Demand Comparison for the Proposed Project**

	Year				
	2010	2015	2020	2025	2030
<b>Normal Water Supply Year</b>					
Projected Supplies <sup>1</sup>	14,553	14,553	14,553	14,553	14,553
Projected Demand <sup>2,3</sup>	13,732	14,032	14,332	14,632	14,932
Difference	821	521	221	(79)	(379)
<b>Single Dry Water Year</b>					
Projected Supplies <sup>4</sup>	13,527	13,527	13,527	13,527	13,527
Projected Demand <sup>5,3</sup>	12,329	12,629	12,899	13,169	13,439
Difference	1,198	888	618	349	78
<b>Multiple Dry Water Years</b>					
Projected Supplies <sup>6</sup>	14,553	14,553	14,553	14,553	
Projected Demand <sup>7,3</sup>	13,732	14,032	14,332	14,632	
Difference	821	521	221	(78)	
<sup>1</sup> From Table 13 in the City of Inglewood 2005 UWMP. <sup>2</sup> From Table 13 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (103 AF) <sup>3</sup> Demand does not include additional demand for recycled water because it is presumed that the increase in demand for recycled water can be met without concern due to supply availability from WBMWD; adding the recycled water demand would skew the domestic analysis unfairly <sup>4</sup> From Table 16 in the City of Inglewood 2005 UWMP. <sup>5</sup> From Table 16 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (103 AF) <sup>6</sup> From Tables 19, 22, 25 & 28 in the City of Inglewood 2005 UWMP. <sup>7</sup> From Tables 19, 22, 25 & 28 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (103 AF) Source: Hollywood Park Redevelopment Project Water Demands, Letter Report, Stetson Engineers, Inc., July 17, 2008.					

Should the development plans be phased in over time, water demand impacts would be phased in as well. But ultimately, the full effect of the water demand impacts will be realized upon complete implementation of the Proposed Project.

As indicated earlier, this analysis did not include any reduction in water supplies resulting from the potential 30% reduction in wholesale water supplies from MWD since it is not clear yet what the actual impact would be to the City of Inglewood. The City of Inglewood water supply sources include both imported water and groundwater.

Over the seven year period from 2000-2007, the average shows 43.58% pumped versus 56.42% imported. Since the 30% reduction applies only to imported water, 30% of 56.42% yields a 16.93% overall reduction. If this reduction of supplies was applied in the above water supply and demand comparison, it would show greater water supply deficits, and further indicate the need for the Hollywood Park Redevelopment Project to augment the supply of water through groundwater or other supplies in order to meet the water demands of the Proposed Project.

#### *Recycled Water Demand*

The Proposed Projects recycled water demand could be met through treated water from the West Basin Municipal Water District water treatment plant in El Segundo. The project would include the construction of a piped recycled water distribution system within the project area. The primary infrastructure would consist of a looped ring-main with extensions to provide service to the public parks, landscaped parkways, and privately maintained common landscape areas (i.e. home owner association) within the proposed lots. This will be installed under the roadways in the public right of way. The project would connect to the existing WBMWD recycled supply line running along Prairie Avenue. The on-site network would be operated and maintained by City of Inglewood Water Department.

As shown in Table IV.J-4, below, the Proposed Project is estimated to generate a demand of 179,229 gpd (200.76 AFY). By taking into account a reduction of 11,370 gpd (13 AF/Y) of recycled water that is currently generated by the existing land uses on the Project Site, the total estimated water demand increase is 167,859 gpd. WBMWD has indicated that the increased demand for recycled water can be met by its current supply<sup>13</sup> and that there is ample capacity and pressure in the pipeline to meet the demands of the Hollywood Park Redevelopment Project.<sup>14</sup> Thus, the impact of the increased recycled water usage is less than significant.

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<sup>13</sup> WSA Section VI and attached letter from WBMWD, dated July 7, 2008.

<sup>14</sup> WSA Section VI and WBMWD will serve letter dated March 29, 2007.

**Table IV.J-4  
Estimated Recycled Water Demand for Proposed Project<sup>15</sup>**

<b>Project Land Use</b>	<b>Quantity</b>	<b>Unit</b>	<b>Demand Factor</b>	<b>Total (GDB)</b>
Parks (Recycled Water)	21.72	AC	3,445 GPD/AC ***	74,825
Public Streets (Recycled Water)	9.93	AC	3,445 GPD/AC ***	34,195
Private HOA Open Space	20.38	AC	3,445 GPD/AC ***	70,209
<b>TOTAL RECYCLED WATER USES =</b>				<b>179,229</b>
<i>Source: Hollywood Park Redevelopment Project Water Demands, Letter Report, Stetson Engineers, Inc., July 17, 2008.</i>				

### *Fire-Flow*

The on-site network would be operated and maintained by City of Inglewood Water Department. As determined in consultation with the LACoFD, for the design of the water network to meet LA County fire flow requirements the following criteria will be applied:

- required total water flow shall be the sum of the minimum fire flow plus the maximum daily water flow requirements;
- average daily design flow shall be at a normal operating pressure of not less than 35 p.s.i. nor more than 125 p.s.i.;
- minimum fire flow and fire hydrant requirements shall be determined by the fire chief or fire marshal;
- available fire flow shall be based upon a minimum of 20 p.s.i. residual operating pressure remaining in the street and the fire flow will not exceed 5,000 gpm; and
- minimum size for use in the distribution shall be nominal 6-inch diameter on which hydrants are located.

With implementation of the criteria identified above, the Proposed Project would meet the required fire flow needs of the proposed development and impacts would be less than significant. See Section IV.J.2, Fire Protection, for a complete discussion of existing fire flow requirements.

### *No Need for New or Expanded Water Facilities*

The City's water distribution system consists of 808,000 feet (152 miles) of pipe, ranging in size from 3 inches to 30 inches in diameter and providing water for residential, commercial, industrial and fire

<sup>15</sup> WSA and attached letter from Stetson Engineers, Inc., dated July 17, 2008, Table 1.



suppression. The City's treatment plant is located on 3 acres and has capacity to treat 8.5 million gallons per day of groundwater. The City operates 4 wells that extract local groundwater from the West Coast Basin and treats it at the treatment plant. The City also maintains 3 pumping stations with a total of 24 separate pumps; and 3 reservoirs ranging in individual capacity from 1 million gallons to 16 million gallons of water with an overall storage capacity of 21.6 million gallons of water.<sup>16</sup>

There are also 198 Backflow prevention devices and 1,250 devices for internal protection. The system has about 1,540 fire hydrants and 2,600 gate valves. Because of the large variation in the service area elevations, the City's water system has three pressure zones. All three are closed zones without a free water surface control. System pressure is maintained through pumping and the pressure at the imported water connections for Zones 2 and 3, and normally through a pressure regulating station for Zone 1.<sup>17</sup>

The Proposed Project would result in an increase in the amount of water demanded for the Project Site and what was accounted for in the 2005 UWMP. As further discussed below *under "Additional Pumping of City's Adjudicated Water Rights,"* the City currently has ground water pumping wells (wells #1, 2, 4, and 6 are in service), and the 2005 UWMP has anticipated the need for additional wells. Likewise, the City currently has two connections with MWD through which it purchases imported water; six connections to Golden State Water Co.; two connections to the Los Angeles Department of Water and Power; and 16 connections to supply reclaimed water from WBMWD. Because additional pumping can utilize existing facilities, the need for additional infrastructure beyond what is currently available or anticipated would not be required, and any need for new or expanded water facilities for the City would be required independent of whether the Proposed Project is implemented. Upgrades to existing infrastructure would be more likely to take place over the course of several years, and the costs of such upgrades would likely be financed through water charges or impact fees. Since the Proposed Project would not require construction or expansion of existing water facilities, impacts would be less than significant.

### **Land Use Equivalency Program**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area. More specifically, the under the Proposed Equivalency Program residential units could be increased to a maximum of 3,500 units with a corresponding decrease in other land uses.

Water consumption impacts pertaining to construction activities under the Equivalency Program would be nearly identical to those that would occur under the Proposed Project and would not result in increased water consumption impacts, given the similarity in nature and intensity of construction activities under both development scenarios. Furthermore, operational impacts to distribution infrastructure (potable and

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<sup>16</sup> 2005 UWMP at page I-7.

<sup>17</sup> *Ibid.*

recycled water infrastructure) under the Equivalency Program would be similar to the Proposed Project, as City of Inglewood oversight of design and planning of water distribution infrastructure under the Equivalency Program (i.e., to ensure system adequacy) would still occur.

Operational potable water consumption under the Equivalency Program would, under some development scenarios (e.g., all of the Maximum Housing scenarios), result in greater potable water supply impacts than under the Proposed Project. As presented in the WSA, potable water consumption for the Proposed Project would be 667,261 gpd. In addition to the Project, the WSA analyzed the impacts of a Maximum Housing Alternative with up to 3,500 dwelling units (See Alternative RU 3,500 in Section VI.E., Alternatives to the Proposed Project). Under that scenario the water demands for a Maximum Housing Alternative with 3,500 dwelling units would be approximately 712, 692 gpd. Overall, the impacts to potable water demand of the Equivalency Program would fall somewhere between the impacts analyzed for the Proposed Project and Alternative RU 3,500. The analysis of Alternative RU 3,500 represents a more intensive development than the scenarios under the Equivalency Program, since under the Equivalency Program, an increase in the intensity of one land use results in the decrease in the intensity of another land use. For example, unlike Alternative RU 3,500 analyzed in the WSA, when 3,500 units are constructed on the Project Site under the Equivalency Program, 620,000 sf of retail space cannot be constructed—at most 590,200 sf of retail could be constructed. As a result, the impacts analyzed in Alternative RU 3,500 represent the greatest level of impacts that could result from implementing the Equivalency Program. Further, like the Proposed Project, additional pumping that may be required with implementation of the Equivalency Program can be accommodated by existing facilities, and the need for additional infrastructure beyond what is currently available or anticipated would not be required.

Recycled water consumption impacts during operation of land uses under the Equivalency Program would be equivalent to the Proposed Project, given the same landscaped area and amount of parks and open space. As such, construction impacts, as well as operational impacts related to distribution infrastructure and recycled water supply would be less than significant under the Equivalency Program, as is the case with the Proposed Project, since the total estimated water demand at buildout would not exceed available recycled water supplies or potable/reclaimed distribution infrastructure capabilities.

## **CUMULATIVE IMPACTS**

Implementation of the Proposed Project including the proposed Land Use Equivalency Program scenarios in conjunction with the related projects identified in Section III (Related Projects) would further increase demands for water supply. The Related Projects identified in Section III includes projects located throughout the City of Inglewood, the City of Culver City, the City of Hawthorne, the City of Los Angeles, and the County of Los Angeles. For purposes of this analysis, only the Related Projects that fall within the City of Inglewood's Water Service Area are included because the City of Inglewood is the applicable water purveyor. All of the remaining related projects located within the cities of Culver City, Hawthorne and Los Angeles, and Los Angeles County are served by other water agencies and, as such, fall under the purview of separate UWMP. Based upon information contained in the City of Inglewood's Water Master Plan prepared in 2003, approximately 84% of the City is served by the City's water system. Twelve of the related projects that are located within the City of Inglewood, including Related Projects

No. I-1, I-5, I-7, I-8, I-16, I-18, I-20, I-27, I-28, I-29, I-31, I-32, and I-33 are located outside the City's water service area and are served by the Cal- America Water Company. As such these projects would not affect the available water supply within the Inglewood water service area.

Each of the related projects that are within the City of Inglewood water service area that are consistent with the underlying zoning and General Plan and growth assumptions in which the Water Management Plan was based on have already been accounted for in the water supply areas cumulative demand. For any related projects that are non consistent with these assumptions, or meet the criteria set forth in SB 610 calling for the preparation of a Water Supply Assessment, a separate analysis demonstrating sufficient water supply is available would be required on a project-by-project basis. In addition, in projecting the future water demands for the City, the UWMP assumed a 2.5% increase in the resident population within the service area every five years with a 57% increase in commercial water service connections over the next 20 years.

With respect to long-term planning projections, the UWMP concluded that the projected water demands through the year 2030 can be met for the normal year supply and demand projections based upon the projected supplies, except in 2030 when the City may have to purchase approximately 2% of additional supplies. For single dry year and in multiple dry year conditions, the City would have sufficient supplies to meet the demand under the present day scenario. Historically, the City has been able to meet demand during single dry year and multiple dry year conditions by importing additional water from the WBMWD. In the future, the City may not be able to meet demand in single dry years or multiple dry years if regional agencies are unable to supply sufficient supply to all its member agencies. As such, the City is committed to aggressively seeking ways to reduce water demands and increase water supplies. Similar to the water conservation mitigation measures imposed for the Proposed Project, water conservation strategies and conditions would apply to each of the related projects to further reduce future water demands. Therefore, cumulative water impacts would be less than significant.

## **PROJECT DESIGN FEATURES**

PDFs to implement energy and water conservation measures in accordance with the Sustainability Checklist contained in the Hollywood Park Specific Plan are identified in Section IV.B, Air Quality.

## **MITIGATION MEASURES**

### **Potential Sources of Additional Water**

California Water Code Section 10911 explains that if the City concludes that water supplies are, or will be, insufficient, "the city or county shall include in its water supply assessment its plans for acquiring additional water supplies, setting forth the measures that are being undertaken to acquire and develop those water supplies." Section 10911 also provides that the water supply assessment include information concerning estimated costs and proposed financing for the additional water supplies; permits, approvals and entitlements anticipated for the additional water supplies; and estimated timeframes to acquire the additional water supplies. Because the project water supply analysis indicates a deficit of 103 AF/yr for

the Proposed Project (and a maximum of 154 AF/yr under the proposed Land Use Equivalency Scenario), the following discussion addresses additional water supplies in accordance with Section 10911.

Additional sources of water, as more fully discussed below, include the following:

- A. Additional pumping of City's adjudicated water rights
- B. Utilization of additional leased or purchased ground water rights
- C. Combination of the additional pumping and acquisition of additional water rights
- D. Conservation

As noted above, utilization of additional imported water is not reliable due to uncertainty surrounding potential reduction in water supplies resulting from the possible 30% reduction in wholesale water supplies from MWD. Therefore it is assumed that any deficit will be made up from groundwater or conservation.

#### *Additional Pumping of City's Adjudicated Water Rights*

In Fiscal Year 2007, the City had 4,449.89 AF of water rights, plus a carryover of 788.94 AF water rights. According to the West Coast Basin Watermaster records for FY 2007, the City pumped 3,551.28 AF from groundwater supplies and purchased 7,527.10 AF of imported water. Thus, in FY 2007 the City did not pump 1,687.55 AF of its adjudicated water rights.

This additional water supply can be pumped from the City's existing or already planned for wells due to the long-term reliability of groundwater supply managed by the Water Replenishment District (WRD) of Southern California. WRD is managing the West Basin groundwater supply through its replenishment, monitoring and water quality activities. With its shift to more recycled water for supply to seawater intrusion barriers and the establishment of groundwater storage in the basin, groundwater supply reliability will continue to improve. With the completion of Phase V Expansion of the Edward C. Little Water Recycling Facility and future barrier water supply projects, "all replenishment to the West Coast Basin, the source of the City's groundwater production, will be immune to drought and other supply challenges."<sup>18</sup>

Likewise, the West Basin Municipal Water District (West Basin) has indicated that it has developed a model water conservation ordinance which will have a positive affect on water reliability in the West Coast Basin. As previously discussed, the conservation ordinance includes increasing the use of recycled water for injection at the West Coast Seawater Barrier; conversion of the Dominguez Gap Seawater Barrier from imported water to recycled water sources; development of ocean-water desalination planned

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<sup>18</sup> See letters attached to the WSA from WRD, Re: Groundwater Supply Reliability, dated July 23, 2008, and West Basin Municipal Water District, dated July 7, 2008.

by 2020; implementation of its Conservation Master Plan; and participation in groundwater conjunctive use programs. In summary West Basin notes: “Through the implementation of these actions West Basin will meet 60% of the service area needs through conservation and locally controlled supply sources by 2020, compared roughly to one-third today.”<sup>19</sup>

Thus the 1,687.55 AF of the City’s adjudicated water rights is a significant source of additional water available to the City, which can be safely pumped from City wells without an impact on groundwater supply. This 1,687.55 AF of water would be available to cover the deficits under either Alternative 1 or Alternative 2 (as described in the WSA). More specifically, the City could pump an additional 103.16 AF and still have 1,584.39 AF of unpumped water rights to satisfy other City water demands.

This 1,687.55 AF of water also provides a source to address the potential reduction of 16.93% of the City’s water supply (see previous discussion of the 16.93% potential reduction due to potential reductions in imported water.) More specifically, the loss of 16.93% of the City’s overall water supply in 2007 (11,078.38) would have resulted in a deficit of approximately 1,875 AF. As further discussed below, it is expected that the City will be able to lease at least an additional 343 AF of water in the future, even assuming that the reductions in wholesale water availability create more demand on Basin sources.

Additional pumping of the City’s existing adjudicated water rights will result in costs comparable to the existing WBMWD rates for pumping and treating ground water. Furthermore, in the event that prices rise due to drought or water shortage, the West Coast Basin Judgment provides a pricing mechanism to obtain a groundwater lease from the exchange pool which includes a maximum price not to exceed the sum of the price per acre-foot charged by the Metropolitan Water District (MWD) of Southern California to WBMWD plus the additional amount per acre-foot charged by the latter to municipalities and public utilities for water received from said MWD.

The City currently has ground water pumping wells, and the UWMP has anticipated the need for additional wells, however, the additional infrastructure beyond what is currently anticipated would not be required. Likewise, additional permits or entitlements would not be required, as the City is already authorized to pump its current and potential additional adjudicated water rights.

### *Additional Leasing of Water Rights*

The September 2007 report entitled “Watermaster Service in the West Coast Basin, Los Angeles County, July 1, 2006- June 30, 2007” (2007 Watermaster Report), explains that of the 64,468 AF of adjudicated rights in the basin there was approximately 38,933.63 AF of adjudicated rights that was not extracted.<sup>20</sup> Moreover, the 2007 Watermaster Report states that during the applicable period there were 11 water right

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<sup>19</sup> See letters attached to the WSA from WRD, Re: Groundwater Supply Reliability, dated July 23, 2008, and West Basin Municipal Water District, dated July 7, 2008.

<sup>20</sup> 2007 Watermaster Report at page 8, Table 2.

leases totaling 7,580.90 AF and three permanent transfers of water right ownership.<sup>21</sup> Table 2 of the 2007 Watermaster Report lists approximately 55 individuals and entities (not including the City of Inglewood) with adjudicated rights. Thus, in the 2006 to 2007 year, there was approximately 38,934 AF available that could have been leased from approximately 44 different individuals and entities. Because of the abundance of unextracted water as well as the wide variety of parties who have unused adjudicated rights at this time, it is reasonable to conclude that in future years the City may lease additional water from other parties with adjudicated rights. Even if the availability of Basin water is reduced substantially due to increasing demand on groundwater rights by other producers, if even a fraction of the currently unused 38,934 AF remain available for lease, the City will be able to satisfy its projected needs and the Project's projected needs.

When calculating the projected water supplies for the City, the 2005 UWMP explains that the net leases/exchanges is 340 AF per year averaged over an 18 year period.<sup>22</sup> Historically, the City has leased water from a wide variety of sources in amounts ranging from 282 to 1,700 AF/yr. This history of leasing from a variety of sources in amounts up to 1,700 AF/yr combined with the availability of adjudicated water rights available for lease as previously discussed, further indicates that additional leasing is a viable and likely component of the City's future water supplies.

Thus, mitigation measures are required for the Project which will secure a long term water supply for the Proposed Project and impose conservation measures similar to those that would be imposed during dry or multiple dry years. So long as the water supply deficit generated by the Proposed Project is addressed, water supply impacts will be reduced to less than significant. Due to the unaccounted for domestic water demand is in the Normal Water Supply Year 2030 as well as the uncertainty with regards to SWP supplies, the following mitigation measures are required:

- MM J.1-1. The Applicant shall lease or convey to the City its sufficient adjudicated pumping rights to cover the projected project related water supply deficit (i.e., 103 or 154 AF/yr).
- MM J.1-2. The Applicant shall ensure all toilets installed within the project will be high efficiency models.
- MM J.1-3. The Applicant shall ensure all urinals installed within the project will be high efficiency models.
- MM J.1-4. The Applicant shall ensure shower fixtures shall be limited to one showerhead per shower stall.

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<sup>21</sup> 2007 Watermaster Report at page 4.

<sup>22</sup> 2005 UWMP at page 11-5.

- MM J.1-5. The Applicant shall ensure any residential dishwashers provided on site will be high efficiency dishwashers (Energy Star rated).
- MM J.1-6. The Applicant shall ensure domestic water heating systems will be located in close proximity to point(s) of use, as feasible; and shall use tankless and on-demand water heaters, as feasible.
- MM J.1-7. The Applicant shall ensure the on-site irrigation system will include the following requirements:
- Weather-based irrigation controller with rain shutoff;
  - Flow sensor and master valve shutoff (large landscapes);
  - Matched precipitation (flow) rates for sprinkler heads;
  - Drip/microspray/subsurface irrigation where appropriate;
  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials; and
  - Use of landscape contouring to minimize precipitation runoff.
- MM J.1-8. The Applicant shall ensure the Project will provide individual metering and billing for water use for all dwelling units.
- MM J.1-9. The Applicant shall ensure that the Project will utilize recycled water for appropriate end uses (irrigation).
- MM J.1-10. The Applicant shall comply with the Standard Urban Storm water Mitigation Plan (SUSMP) and shall encourage implementation of Best Management Practices that have stormwater recharge or reuse benefits.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With respect to threshold question (a), the City currently has ground water pumping wells, and the UWMP has anticipated the need for additional wells. However, the need for additional infrastructure beyond what is currently anticipated would not be required to carry out the Proposed Project, including the Equivalency Program, and any need for new or expanded water facilities for the City would be required independent whether the Proposed Project is implemented. Therefore, the Proposed Project would not require or result in the construction of new water facilities or expansion of existing facilities, and impacts would be less than significant.

With respect to threshold question (b), with implementation of the mitigation measures recommend above, the water supply deficit generated by the Proposed Project, including the Equivalency Program, is

addressed through a variety of potential sources of additional water including pumping, leasing, or purchasing of water supplies. Additionally, the Proposed Project would impose conservation measures similar to those that would be imposed during dry or multiple dry years. Therefore, sufficient water supplies would be available to serve the Proposed Project from existing entitlements and resources, and water supply impacts will be reduced to a less than significant level.



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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**2. WASTEWATER**

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**ENVIRONMENTAL SETTING**

**Regional Infrastructure**

Sewer and wastewater service within the City of Inglewood is provided by the City of Inglewood Department of Public Works and the Los Angeles County Sanitation District (LACSD). LACSD boundaries encompass approximately 85,019 acres, and contain approximately 155 miles of sewer mains in the City of Inglewood, with a total of 16,177 active refuse accounts in the City. The LACSD manages wastewater collection and treatment for the City of Inglewood. The wastewater from the City primarily flows to the Joint Water Pollution Control Plant (JWPCP) located in the City of Carson. The wastewater flow from the City to the LACSD treatment facility is estimated to be 10.6 million gallons per day (mgpd), of which approximately 8.9 mgpd is from the portion of the City served by the City's water system. Additionally, LACSD is responsible for monitoring industrial waste discharges into the wastewater system.<sup>23</sup>

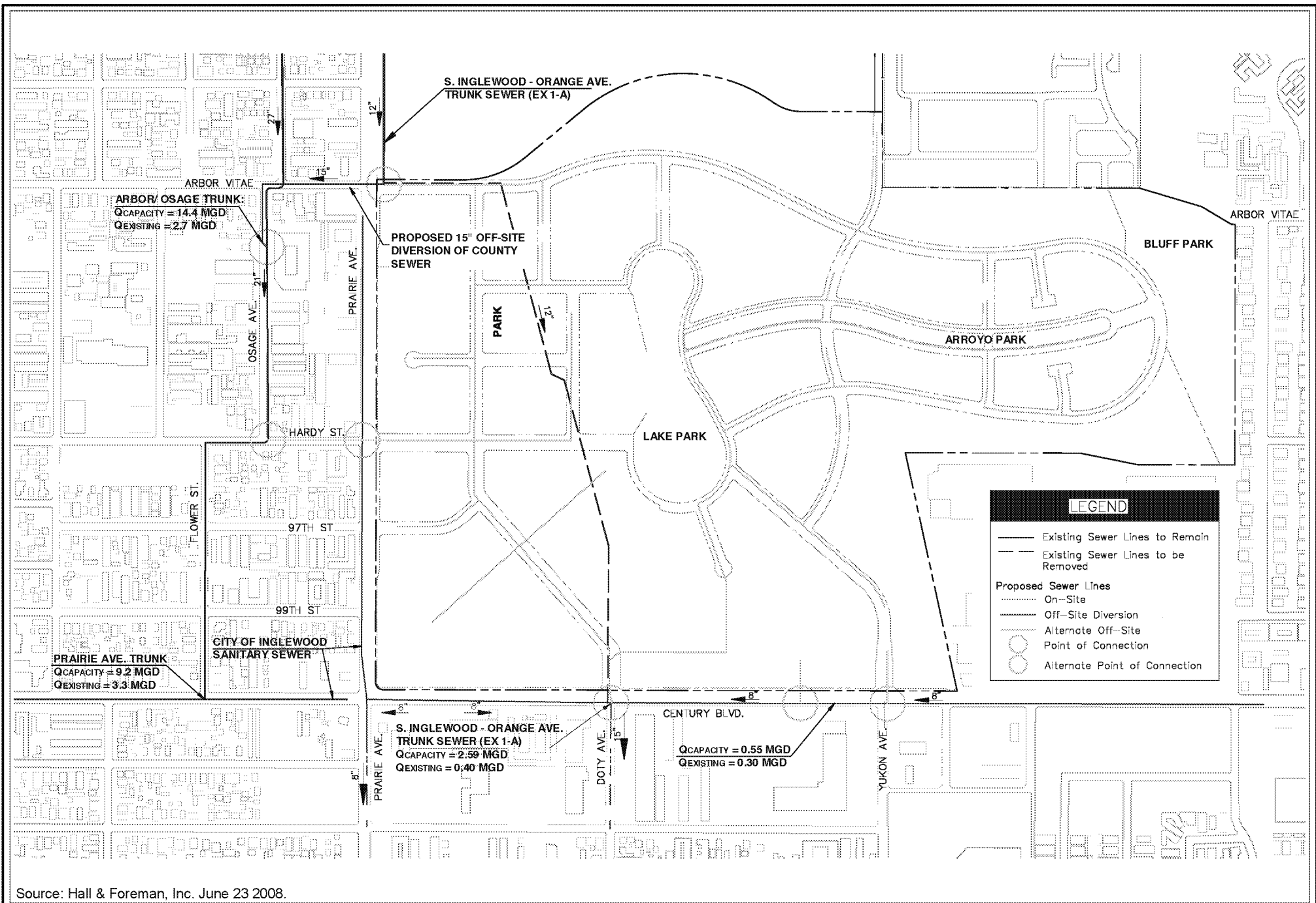
The JWPCP provides treatment capacity for all wastewater flows generated within the Project Area. The JWPCP provides primary and secondary treatment for approximately 320 million gallons of wastewater per day. The plant services a population of approximately 3.5 million people throughout Los Angeles County. Prior to discharge, the treated wastewater is disinfected with hypochlorite and sent to the Pacific Ocean through a network of outfalls, which extend two miles off the Coast of Southern California into the Palos Verdes Peninsula.

**Wastewater Infrastructure**

The Proposed Project is located in an area that is adequately served by existing wastewater infrastructure. Local sewer infrastructure in the City of Inglewood is maintained by the City of Inglewood Public Works Department. Wastewater conveyance lines exist in the vicinity of the project area and consist of county trunk-sewers and City of Inglewood local collector-sewers (See Figure IV.J-2, Existing and Proposed Sewer Infrastructure Map). The Proposed Development is located within the jurisdictional boundaries of District No. 5. The Districts' 21-inch diameter Prairie Avenue Trunk Sewer, located at Hardy Street at Osage Avenue, has a design capacity of 14.4 mgpd and conveyed a peak flow of approximately 2.7 - mgpd when last measured in 2007. The Districts' 24-inch diameter Prairie Avenue Trunk Sewer, located at Century Boulevard and Flower Street, has a design capacity of 9.2-mgpd and conveyed a peak flow of 3.3- mgpd when last measured in 2007.

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<sup>23</sup> 3.2 Sewer and Wastewater, City of Inglewood General Plan Update Technical Background Report, 2006.



Source: Hall & Foreman, Inc. June 23 2008.



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Figure IV.J-2  
 Existing and Proposed Sewer  
 Infrastructure Map

The Districts' 15-inch diameter South Inglewood-Orange Avenue Trunk Sewer, located in Doty Avenue at Century Boulevard, has a design capacity of 2.59 mgpd and conveyed a peak flow of 0.4 mgpd when last measured in 2007. The wastewater generated by the Proposed Project will be treated at the Joint Water Pollution Control Plant located in the City of Carson operated by the LACSD, which has a design capacity of 385-mgd and currently processes an average flow of 310.8-mgd.<sup>24</sup> Table IV.J-5 provides existing wastewater infrastructure that runs adjacent to the Project Site.

**Table IV.J-5  
Existing Wastewater Infrastructure Adjacent to the Project Site**

Location	Size	Notes
Prairie Avenue	City of Inglewood 8" south of Harbor Vitae flowing south, LA Co. Sanitation 10" trunk north of Arbor Vitae also flowing south	LA County 10" trunk enters Hollywood Park site across from Arbor Vitae
Century Boulevard	City of Inglewood 8" from Prairie Ave to Yukon Ave flowing toward convergence at Doty Ave	LA County 10" trunk becomes 12" Within Hollywood Park site, converges at Doty Ave. and continues south along Doty Ave as a 15" trunk
W. 90 <sup>th</sup> St/Pincay	City of Inglewood 10" V.C.P. flowing west Into LA County 10" trunk at Prairie Ave	
<i>Source: Hall &amp; Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.</i>		

## ENVIRONMENTAL IMPACT

### Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project were to:

- (a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board; or
- (b) Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; or
- (c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Wastewater generation associated with the Proposed Project was calculated using generation factors based on land use, as provided by the County of Los Angeles, which uses City of Los Angeles sewer load factors.<sup>25</sup> The estimated net increase was analyzed relative to infrastructure and treatment plant capacity.

<sup>24</sup> Hall & Foreman, Inc., *Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.*

<sup>25</sup> City of Los Angeles, *CEQA Thresholds Guide, May 1998, p. K.2-20.*

## **Project Impacts**

### *Construction*

Construction of the Proposed Project would require connections to the local sewerage conveyance infrastructure that is located in the right-of-way easements adjacent to the Project Site. The City of Inglewood sanitary system will be used to convey flows off site and connect into LACSD trunk sewers running close to the project site boundary. It is currently intended that a new on-site sewer gravity system will be provided to collect wastewater flows. The minimum size of sewer runs will be 8" lines installed under roadways within the public right of way or easements. This new system will be maintained and operated by City of Inglewood Department of Public Works upon completion of construction. The current redevelopment proposals will require the relocation and quit claim of the existing LACSD 12" sewer and associated easement that crosses the site. It is currently intended to relocate this route below the proposed public street network. This sewer will still be maintained and operated by LACSD. The installation of new sanitary sewers and the connection to existing sewer lines would require minimal trenching and pipeline installation on-site and at off-site locations in the public right-of-way. Such activities could result in temporary sidewalk or roadway lane closures for short periods of time but would not result in any adverse environmental impacts. Therefore, Project impacts with respect to the construction impacts to connect to the existing wastewater infrastructure would be less than significant.

### *Operation*

The Proposed Project's wastewater demand could be met through use of the Los Angeles County Sanitation District Joint Water Pollution Control Plant (JWPCP) wastewater treatment plant in the City of Carson. As shown in Table IV.J-6, below, the Proposed Project is anticipated to generate a net total of approximately 393,000 gpd of wastewater, or 143 million gallons annually. Sewage generated by the Proposed Project would continue to be conveyed and treated at the JWPCP, which has adequate capacity to accommodate the increased wastewater flows and thus RWQCB treatment standards area assured of being maintained.

Water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures that prevent water loss, limitations on hose washing of driveways and parking areas, etc.) would be implemented as part of the Proposed Project and would help reduce the amount of wastewater generated by the Proposed Project. Such water conservation features are largely required by Title 24 building code requirements for new buildings. As such, Project impacts with respect to the wastewater treatment capacity would be less than significant.

The operational sewage generation for the Proposed Project represents approximately 0.16 percent of the JWPCP's daily effluent capacity (550 mgpd), or approximately 0.2% of JWPCP's current excess capacity (190 mgpd). These increases would be well within the excess treatment capacity currently available and projected to be available at JWPCP. Therefore, the Proposed Project's impact on wastewater services would be less than significant.

**Table IV.J-6  
Estimated Wastewater Generation by Proposed Project**

Land Use	Unit/Quantity	Generation Rate (gpd/unit) <sup>a</sup>	Total (gallons/day)
Existing Uses <sup>b</sup>	--	--	524,000
<b>Proposed Project</b>			
Residential <sup>c</sup>	2,995 units	200gal/unit/day	599,000
Office/Commercial	75,000 sf	0.2 gal/sf/day	15,000
Retail	620,000 sf	0.325 gal/sf/day	201,500
Casino/OTB	120,000 sf	0.35 gal/sf/day	42,000
Hotel			
Rooms	300 rooms	125 gal/room/day	37,500
Meeting Space	20,000 sf	0.3 gal/sf/day	6,000
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	20 gal/student/day	16,000
Open Space	25 AC	--	--
		<b>Subtotal</b>	<b>917,000</b>
		<b>Net Total</b>	<b>393,000</b>
<u>Notes:</u>			
<sup>a</sup> Generation Rates based on County Sanitation Districts of Los Angeles County wastewater generation rates. Uses not listed are estimated by the closest type of use available in the table.			
<sup>b</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.			
<sup>c</sup> Based on highest estimated residential generation from EIR Technical Appendix - Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008. (includes 10,000 sf HOA Facility).			
<sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of impacts to Wastewater, the Civic Use is assumed to be a school, and as such, generation rates for public utilities are based on a school use because it would be the most intensive civic use.			
<sup>e</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, June 2007.			

### Land Use Equivalency Program

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

Wastewater impacts pertaining to construction activities under the Equivalency Program would be nearly identical to those that would occur under the Proposed Project and would not result in increased wastewater impacts, given the similarity in nature and intensity of construction activities under all development scenarios. As such, construction impacts would be less than significant under the Equivalency Program, as is the case with the Proposed Project.

Operational wastewater generation under the Equivalency Program would vary between the different equivalency scenarios that are identified in Table II-1 in Section II, Project Description. As summarized in Table IV.J-7, below, all three Maximum Housing equivalency scenarios would result in an approximate 8% increase in wastewater generation as compared to the Proposed Project.

**Table IV.J-7**  
**Estimated Wastewater Generation Under the Proposed Equivalency Program**

<b>Development Scenario</b>	<b>Wastewater Generation (gpd)</b>	<b>Over / (Under) Proposed Project</b>	<b>Percent Change From Proposed Project</b>
<b>Proposed Project</b>	917,000	--	--
<b>Equivalency Scenarios</b>			
Maximum Housing 1	991,875	74,875	8.17%
Maximum Housing 2	990,815	73,815	8.05%
Maximum Housing 3	989,875	72,875	7.95%
Maximum Retail	916,075	(925)	-0.10%
Maximum Office/Commercial	910,155	(6,845)	-0.75%
Maximum Hotel	922,375	5,375	0.59%
<i>Source: Christopher A. Joseph &amp; Associates, July 2008 (Equivalency Calculation Worksheets are provided in Appendix I.)</i>			

Wastewater generation under the maximum hotel scenario would increase by approximately 0.59 percent. Wastewater generation under the maximum retail and maximum commercial/office scenarios would decrease by approximately 0.1 and 0.75 percent, respectively. Compared to the proposed project, the fluctuations in wastewater generation under all the equivalency program scenarios would not exceed 9 percent of the projected generation for the proposed project. It should be noted that the wastewater generation rates used to estimate wastewater generation for the proposed project and the land use equivalency program are based on standard sewer design manual rates for the proposed land uses and do not account for any water conservation measures. Therefore these estimates are considered conservative and would be expected to be reduced as a result of the energy and water conservation measures proposed to be implemented under the specific plan. Because the project's wastewater generation estimates are believed to represent a conservative estimate, an increase to the proposed project's generation by 9% could be off-set by implementing one or more of the water conservation strategies as proposed in the specific plan's sustainability checklist. As such the estimated wastewater generation would not be exceeded. In addition, all scenarios under the equivalency program would be subject to the limitations of the county's sewer system. Therefore, wastewater generation impacts under the proposed land use equivalency program would be less than significant.

## **CUMULATIVE IMPACTS**

Implementation of the Proposed Project, including the Land Use Equivalency Program scenarios, in conjunction with the related projects identified in Section III (Related Projects) would further increase demands for sewer service. The Related Projects List provided in Section III includes related projects located throughout the following jurisdictions: City of Inglewood, City of Culver City, City of Hawthorne, City of Los Angeles, and the County of Los Angeles. For purposes of this analysis, it is assumed that all of the jurisdictions above, with the exception of the City of Los Angeles, are served by the JWPCP. Since wastewater generated within the City of Los Angeles would be treated by the Hyperion Treatment Plant, it is not reasonable to include the wastewater generated by those related

projects located within the City of Los Angeles, and therefore, they are not included in this calculation for cumulative wastewater impacts associated with the Proposed Project. As shown in Table IV.J-8, Projected Cumulative Wastewater Generation, the total sewage generation by the related projects located within the City of Inglewood, City of Culver City, City of Hawthorne, and the County of Los Angeles in combination with the Proposed Project is estimated to be approximately 3,262,459 gpd. Sewage generated by the Proposed Project would contribute approximately 12.0 percent of the total cumulative sewage generation created by these related projects. The cumulative sewage generation for the Proposed Project and these related projects would represent approximately 0.6 percent of the JWPCP's daily effluent capacity (550 mgpd), or approximately 1.6 percent of JWPCP's current excess capacity (190 mgpd). These increases would be well within the excess treatment capacity currently available and projected to be available at the JWPCP. Therefore, the Proposed Project in combination with these identified related projects would not require the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities. Therefore, cumulative impacts on wastewater services would be less than significant.

**Table IV.J-8**  
**Projected Cumulative Wastewater Generation**

Related Projects - Grouped by Land Use	Size	Unit	Generation Rate (gpd/unit) <sup>a</sup>	Total (gallons/day)
Commercial (Shopping Ctr)	5,017,104	sf	0.325 gal/sf/day	1,630,559
Commercial (Supermarket)	25,506	sf	0.15 gal/sf/day	3,826
Auto/Sales Repair	115,000	sf	0.1 gal/sf/day	11,500
Dwelling Units	3,401	du	200 gal/du/day	680,200
Hotel	320	rm	125 gal/rm/day	40,000
School/Day Care	221,842	sf	0.2 gal/sf/day	44,368
Church	5,983	sf	0.05 gal/sf/day	299
Office	1,270,562	sf	0.2 gal/sf/day	254,112
Warehouse	15,774	sf	0.025 gal/sf/day	394
Service Shop	3,314	sf	0.1 gal/sf/day	331
Mortuary	17,232	sf	0.1 gal/sf/day	1,723
Professional Building	562,156	sf	0.3 gal/sf/day	168,647
Restaurant	11,300	sf	1 gal/sf/day	11,300
Health Spa/Gym	37,000	sf	0.6 gal/sf/day	22,200
<b>Related Projects Total</b>				<b>869,459</b>
<b>Proposed Project Net Total</b>				<b>393,000</b>
<b>Cumulative Total</b>				<b>262,459</b>
<b>Proposed Project Percent of Total</b>				<b>12.0 %</b>
<sup>a</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008. Uses are estimated by the closest type of use available in the table. Source: Christopher A. Joseph & Associates, August 2008.				

## PROJECT DESIGN FEATURES

PDF's to implement energy and water conservation measures in accordance with the Sustainability Checklist contained in the Hollywood Park Specific Plan are identified in Section IV.B, Air Quality.

## **MITIGATION MEASURES**

No mitigation measures are required.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The Proposed Project would result in a less than significant impact upon regional wastewater treatment capacity and infrastructure conveyance.



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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**3. ENERGY CONSERVATION**

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**ENVIRONMENTAL SETTING**

**Electricity**

Southern California Edison (SCE) provides electricity service to the City of Inglewood. SCE obtains electricity from various generating sources that utilize coal, nuclear, natural gas, hydroelectric, and renewable resources to generate power. Major power generating sources for SCE include the following: San Onofre Nuclear Generating Station (SONGS), Big Creek Hydro System, and the Mohave Generation Station in Laughlin, Nevada.<sup>26</sup>

As of 2005, the state of California produces approximately 78 percent of the electricity it uses. The remaining 22 percent is purchased through suppliers from the Desert Southwest (15%) and the Pacific Northwest (7%). Thirty-eight percent of the state's electrical energy is generated by natural gas. Additional electricity is generated through other means including hydro-power (17%), nuclear (14%), coal (20%), and renewable sources including solar, wind, and geothermal (11%).<sup>27</sup>

*Regulatory Framework*

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations (CCR). The efficiency standards apply to new construction of both residential and non-residential buildings and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings provided that these standards meet or exceed those provided in Title 24 guidelines.

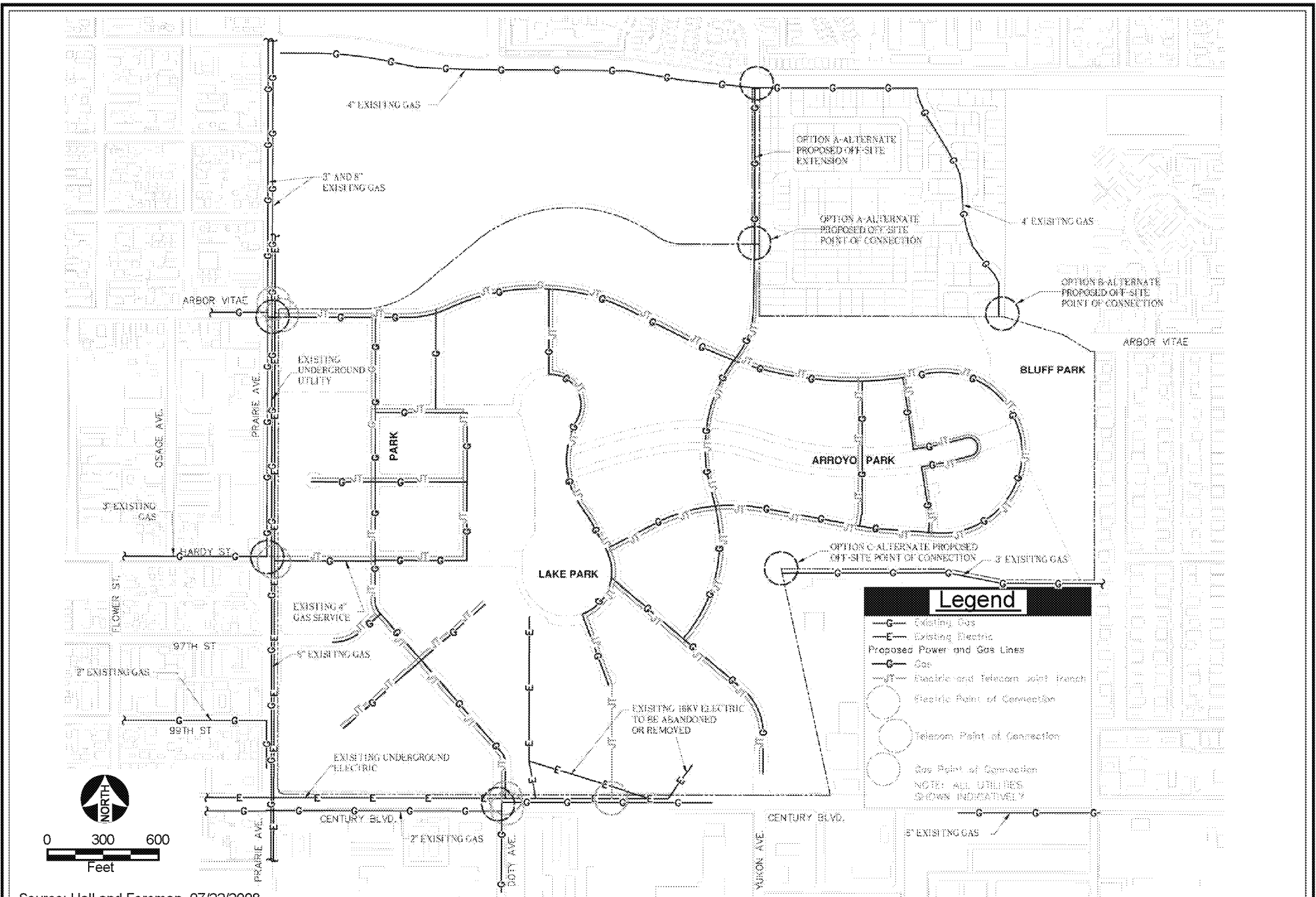
*Existing Infrastructure*

The Proposed Project is located within a developed, urbanized area where facilities currently exist to serve the Project Site and surrounding areas. As shown in Figure IV.J-3, the project site is currently served by a network of electrical infrastructure.

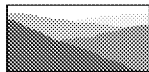
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<sup>26</sup> Southern California Edison: *Generating Facilities*, website: <http://www.sce.com/PowerandEnvironment/PowerGeneration>, accessed October 4, 2006.

<sup>27</sup> California Energy Commission website: <http://energy.ca.gov/html/energysources.html>, accessed October 4, 2006.



Source: Hall and Foreman, 07/22/2008.



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Figure IV.J-3  
 Existing and Proposed Electricity, Natural Gas  
 and Telecom Infrastructure

Electricity to the Grandstand, Casino, and Pavilion is supplied from a single 2,000 amp, 4,160-volt service located in the Pavilion/Casino central plant building. The barn areas are served with 4,160 volts, which forms a separate feed from the utility. An electrical room located in the Pavilion has two unit substations, with three vaults providing service to the parking lot and track lighting. The casino has a preferred emergency (PE) service as part of an added facilities agreement with SCE. This is an extra level of service provided by SCE as spare capacity has to be reserved within the sub-station to provide a back-up supply.<sup>28</sup> Existing electrical and natural gas infrastructure servicing the Project Site is listed in Table IV.J-9, below. The existing commercial uses consume approximately 26,010,004 kilowatt hours (kWh) of electricity per year, and has 6 megavolt amperes (MVA) of peak electricity demand plus the existing on-site infrastructure has a 9-MVA available supply capacity.<sup>29</sup> There are no current deficiencies in electrical service in the vicinity of the Project Site.<sup>30</sup>

**Table IV.J-9  
Existing Electrical and Natural Gas Infrastructure**

Location	Size	Notes
<b>Electricity</b>		
Prairie Avenue	N/A	
Century Boulevard	2x16kV feeds near to Doty Avenue 1x16kV feed near to Yukon Avenue	Below ground cable routes Lennox Sub-station, Boeing and Ryan circuits
W. 90 <sup>th</sup> St/Pincay	N/A	
Other	N/A	
<b>Natural Gas</b>		
Prairie Avenue	2," 3," 8," mainlines	Existing 4" service to Hollywood Park site at Hardy Street
Century Boulevard	2" main west of Yukon Ave, 3" main East of Club Drive	
W. 90 <sup>th</sup> St/Pincay	4" mainline	
Other	3" service just south of panhandle boundary line between Hollywood Park and existing retail site 4" mainline end capped north of panhandle from Renaissance development cul-de-sac	
<i>Source: Hall &amp; Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.</i>		

<sup>28</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

<sup>29</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

<sup>30</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

## Natural Gas

As of 2005, the state of California produced approximately 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the state: 38 percent from the Southwest, 23 percent from Canada, and 24 percent from the Rocky Mountain area.<sup>31</sup> Since 2001, 11 new interstate gas pipelines have been built to serve California, expanding the over one million miles of existing pipelines. Ten additional interstate pipelines are currently proposed or under construction.<sup>32</sup> However, the availability of natural gas is based upon changing conditions of gas supply and regulatory policies.

The Southern California Gas Company (SCG) provides natural gas to the City of Inglewood through existing gas mains located under the streets and public right-of-ways. Natural gas service is provided in accordance with the Gas Company's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made. As a public utility, SCG is under the jurisdiction of the PUC, but can also be affected by the actions of federal regulatory agencies.

### *Existing Infrastructure*

Metered natural gas service is provided to the Project Site and is sub-metered at the grandstand.<sup>33</sup> The locations of the existing local natural gas mains serving the Project Site and surrounding area are listed in Table IV.J-9, above, and are depicted in Figure IV.J-3, Existing and Proposed Electricity and Natural Gas Infrastructure. The uses currently occupying the Project Site consume approximately 37,470 cubic feet of natural gas per month.

## ENVIRONMENTAL IMPACT

### Thresholds of Significance

In accordance with Appendix G (Energy Conservation) of the State CEQA Guidelines, the discussion of a project's impacts may include the following:

- (a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

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<sup>31</sup> California Energy Commission, *California's Major Sources of Energy*, website: <http://www.energy.ca.gov/html/energysources.html>, accessed October 4, 2006.

<sup>32</sup> California Energy Commission, *Natural Gas in California*, website: <http://www.energy.ca.gov/naturalgas/index.html>, accessed October 4, 2006.

<sup>33</sup> Hall & Foreman, Inc., *Hollywood Park Project, Utilities and Infrastructure Technical Report*, August 29, 2008.

- (b) The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- (c) The effects of the project on peak and base period demands for electricity and other forms of energy.
- (d) The degree to which the project complies with existing energy standards.
- (e) The effects of the project on energy resources.
- (f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

## **Project Impacts**

### *Construction*

Energy would be consumed during the demolition, excavation, and construction phases of the Proposed Project for grading and materials transfer by heavy-duty equipment, which is usually diesel powered. Although exact figures cannot be determined until building permits are issued, it is currently expected that the heavy equipment involved in the demolition, excavation, and construction phases of the Project would include crawler-excavators, loaders, bulldozers, graders, water trucks, street sweepers, tractors, cranes, and fork lifts. Construction equipment would use a combination of energy sources, including diesel fuel, gasoline, electricity and natural gas. The electricity and natural gas demands generated during the construction phase would be accommodated by the existing utility providers and impacts would be less than significant.

### *Operation - Electricity*

Existing electrical distribution facilities within the project area would be used to serve the Project Site from the Lennox sub-station. As shown in Figure IV.J-3, the site would tie into existing primary lines running along Century Boulevard and Prairie Avenue. New on-site routes would be designed by SCE. New on-site primary electrical infrastructure would likely include underground routes comprising vaults, conduits, switching features, and transformers which would be installed throughout the project site to service the proposed lots. This will be installed under the roadways in the public right of way. The on-site network would be operated and maintained by SCE. The proposed infrastructure improvements associated with upgrading and installing electrical infrastructure would involve localized trenching and would not result in any adverse impacts.

Development of the Proposed Project would increase the existing demand for electricity service in the project area. The Proposed Project would continue to be served from the existing power grid. As shown in Table IV.J-10, the estimated net increase in electricity consumption by the Proposed Project is approximately 6,836,844 kW-hr/per year. A will serve letter has been received from SCE to provide

electrical service. The electrical loads of the project are within parameters of projected load growth which SCE is planning to meet in the project area.<sup>34</sup>

Table IV.J-10 includes estimated electricity consumption for the existing uses based on actual usage from the existing site, as provided by the project applicant.

**Table IV.J-10**  
**Estimated Electricity Consumption by Proposed Project**

Land Use	Unit/Quantity	Generation Rate <sup>a</sup>	Total (KW-hr/year)
Existing Uses <sup>b</sup>	--		26,010,004
<b>Proposed Project</b>			
Residential	2,995 units	5,626.50 KW-Hr/unit	16,851,368
HOA Facility	10,000 sf	10.5 KW-Hr/sf/yr	105,000
Office/Commercial	75,000 sf	12.95 KW-Hr/sf/yr	971,250
Retail	620,000 sf	13.55 KW-Hr/sf/yr	8,401,000
Casino/OTB	120,000 sf	19.23 KW-Hr/sf/yr <sup>c</sup>	2,307,930
Hotel			
300 Rooms <sup>d</sup>	210,000 sf	9.95 KW-Hr/sf/yr	2,089,500
Meeting Space	20,000 sf	12.95 KW-Hr/sf/yr	259,000
Civic Use <sup>e</sup>	4 AC <sup>f</sup>	10.5 KW-Hr/sf/yr	772,800
Open Space	25 AC	1 KW-Hr/sf/yr	1,089,000
<b>Subtotal</b>			<b>32,846,848</b>
<b>Net Total</b>			<b>6,836,844</b>
<sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise. <sup>b</sup> Hollywood Park Land Company, June 8, 2007. <sup>c</sup> The electricity generation rate was based on existing electricity demands for the casino as provided by the Hollywood Park Land Company. <sup>d</sup> Hotel use based on 700 square feet per room. <sup>e</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use. <sup>f</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2007.			

Also, the generation rates for the Proposed Project are based on standard generation rates for the various proposed uses, as discussed in the Hollywood Park Utilities and Infrastructure Technical Report, Hall & Foreman, Inc., August 29, 2008. Because generation rates for Casino uses are not well established or standardized, the generation rate included in the following chart for the proposed Casino/OTB facility is

<sup>34</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.

based on actual current use at the existing Casino/Pavilion facility. The existing Casino/Pavilion uses approximately 30% of the electricity consumed by all of the existing uses at the project site. This 30% usage by the Casino/Pavilion was established by comparing the average energy usage for the project site from 1989-1994 (the 5 years prior to the commencement of the Casino use) to the incremental increase in usage in 1994 (the year the Casino use commenced). In 1994 the incremental increase in energy usage was 42% thus demonstrating that the Casino used approximately 30% of the electricity consumed by the overall site. From 1994 to the present time, the Casino has been charged for 30% of the overall electricity consumed by the existing site. Thus, based on this historical calculation as well as continuing billing practices, the 30% creates a reasonable foundation to establish the electrical consumption of the existing Casino use.

The generation rate in the table above, based on the existing Casino usage of 30% of the overall consumption of the existing site, is established as follows. The existing uses at the project site consumed approximately 26,010,004 KW-hr during the 2006 calendar year. Thirty percent of 26,010,004 equals 7,693,100 KW-hr per year. Thus, for the 2006 calendar year the existing Casino used approximately 7,693,100 KW-hr per year, which when divided by the square footage of the existing Casino/Pavilion (400,000 square feet) equals a generation rate of approximately 19.23 KW-hr per square foot of Casino use. Thus, the calculations in the table below uses this 19.23 KW-hr per square foot generation rate for the proposed 120,000 square foot Casino/OTB facility, resulting in an estimated electricity consumption for the proposed 120,000 Casino/OTB facility in the amount of 2,307,930 KW-hr per year (19.23 times 120,000 square feet).

The proposed electricity demand from the operation of uses under the Proposed Project are within the anticipated service capabilities of SCE. Current transmission and distribution facilities for electricity are adequate to meet the demands of the Proposed Project, though if any facilities improvements were necessary to meet future demand, SCE is prepared to provide these at that time (see SCE will-serve letter in Appendix A-3). The operation of the Proposed Project would not result in an increase in demand for energy that exceeds available supply or distribution infrastructure capabilities; hence, no significant impacts are expected.

Furthermore, the electricity demand estimates presented above for the Proposed Project at buildout are based on consumption factors presented in the 1993 SCAQMD CEQA Air Quality Handbook, which do not take into account the energy conservation measures that are described in the Project Design Features. As such, the design of the Proposed Project incorporates energy conservation measures that meet or exceed state Title 24 energy conservation standards; hence, the Proposed project would have less than significant impacts on energy consumption.

#### *Operation - Natural Gas*

Existing gas facilities within the project area would be used to serve the project site. The site would tie into existing primary lines running along Prairie Avenue and W. 90<sup>th</sup> Street. New on-site routes would be designed by Southern California Gas Company. This will be installed under the roadways in the public right of way. The on-site network would be operated and maintained by Southern California Gas

Company. The Proposed Project would increase demands for natural gas service in the Project area. As shown in Table IV.J-11 below, the Proposed Project’s net natural gas demands are estimated to be approximately 19.9 million cf per month.

Since the Proposed Project is located in an area already served by existing natural gas infrastructure, the Project would not require extensive infrastructure improvement to serve the Project Site. Impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment. A will serve letter has been received from Southern California Gas Company to provide gas service. Gas service to the project could be served without any significant impact on the environment.<sup>35</sup> Impacts associated with natural gas resources would therefore be less than significant.

**Table IV.J-11  
Estimated Natural Gas Consumption by Proposed Project**

<b>Land Use</b>	<b>Unit/Quantity</b>	<b>Consumption Rate <sup>a</sup></b>	<b>Total (cf/month)</b>
Existing Uses <sup>b</sup>	--	--	3,894,900
<b>Proposed Project</b>			
Residential	2,995 units	6,665 cf/du/month	19,961,675
HOA Facility	10,000 sf	2 cf/sf/month	20,000
Office/Commercial	75,000 sf	2 cf/sf/month	150,000
Retail	620,000 sf	3 cf/sf/month	1,860,000
Casino/OTB	120,000 sf	4.80cf/sf/month	576,000
Hotel			
Rooms-300 Rooms <sup>c</sup>	210,000 sf	5 cf/sf/month	1,050,000
Meeting Space	20,000 sf	2 cf/sf/month	40,000
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	2 cf/sf/month	147,200
Open Space	25 AC	--	--
<b>Subtotal</b>			<b>23,804,875</b>
<b>Net Total</b>			<b>19,909,975</b>
<sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise. <sup>b</sup> Hollywood Park Land Company, June 8, 2007. <sup>c</sup> Hotel use based on 700 square feet per room. <sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use. <sup>e</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2007.			

<sup>35</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.



### **Land Use Equivalency Program Impacts**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The preceding energy analysis addressed impacts associated with construction and operation of the Proposed Project relative to projected energy consumption, as well as the adequacy of electricity and natural gas supplies and distribution infrastructure. The proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

Energy impacts pertaining to construction activities under the Equivalency Program would be similar to that which is projected to occur under the Proposed Project and would not result in increased electricity and natural gas consumption impacts, given the similarity in nature and intensity of construction activities under all development scenarios. Furthermore, operational impacts to distribution infrastructure under the Equivalency Program would be similar to the Proposed Project, as coordination with affected utilities (i.e., SCE and LADWP) for design and planning of electricity and natural gas distribution infrastructure under the Equivalency Program (i.e. to ensure system adequacy) would still occur. As such, construction impacts, as well as operational impacts related to distribution infrastructure, would be less than significant under the Equivalency Program, as is the case with the Proposed Project, since, with coordination with the utility providers, the total estimated energy demand for construction activities would not exceed available energy supplies, and operation of proposed uses would not exceed the capacity of distribution infrastructure.

Operational electricity and natural gas consumption under the Equivalency Program, as shown below in Tables IV.J-12 and IV.J-13 would result in an increase in energy consumption for Maximum Housing 1, 2 and 3. The Maximum Retail scenario would result in a slight decrease in natural gas consumption and electricity use. The Maximum Office/Commercial scenario would result in a decrease in natural gas consumption and a slight increase in electricity use. The Maximum Hotel scenario would result in a slight increase in both natural gas and electricity use. It should be noted that the energy demands used to estimate electricity and natural gas demands for the Proposed Project and the Equivalency Program are based on standard rates for the proposed land uses and do not account for any energy conservation measures. Therefore these estimates are considered conservative and would be expected to be reduced as a result of the energy conservation measures proposed to be implemented under the Specific Plan. Overall, compared to the Proposed Project, the fluctuations in electricity and natural gas consumption under all development scenarios of the Land Use Equivalency Program are equal to or less than 13 percent, the impacts relative to the Proposed Project are not substantial. Therefore, impacts under the Land Use Equivalency Program, as is the case with the Proposed Project, would be less than significant.

**Table IV.J-12**  
**Electricity Demands Under the Proposed Land Use Equivalency Program**

Development Scenario	Net Energy Demands (kW-hr/Year)	Over (Under) Proposed Project (kW-hr/year)	Net Impact Compared to Proposed Project
<b>Proposed Project</b>	32,846,848	--	--
<b>Equivalency Scenarios</b>			
Maximum Housing 1	34,392,220	1,545,372	4.7
Maximum Housing 2	34,263,860	1,417,012	4.31
Maximum Housing 3	34,316,900	1,470,052	4.48
Maximum Retail	32,517,318	329,531	-1.0
Maximum Office/Commercial	32,853,398	6,550	0.02
Maximum Hotel	33,306,018	459,170	1.40

*Source: Christopher A. Joseph & Associates, July 2008 (Equivalency Calculation Worksheets are provided in Appendix I.)*

**Table IV.J-13**  
**Natural Gas Demands Under the Proposed Land Use Equivalency Program**

Development Scenario	Energy Demands (cf/month)	Over (Under) Proposed Project (cf/month)	Percent Change From Proposed Project
<b>Proposed Project</b>	23,804,875	--	--
<b>Equivalency Scenarios</b>			
Maximum Housing 1	26,803,700	2,998,825	12.6%
Maximum Housing 2	26,681,300	2,876,425	12.1%
Maximum Housing 3	26,675,700	2,870,825	12.1%
Maximum Retail	23,557,875	(247,000)	-1.04%
Maximum Office/Commercial	23,522,675	(282,200)	-1.19%
Maximum Hotel	24,319,875	515,000	2.16%

*Source: Christopher A. Joseph & Associates, July 2008 (Equivalency Calculation Worksheets are provided in Appendix I.)*

## CUMULATIVE IMPACTS

### Electricity

Implementation of the Proposed Project, as with the Land Use Equivalency Program, in conjunction with the related projects identified in Section III (Related Projects) would further increase demands for electricity. The Related Projects List provided in Section III includes related projects located throughout the following jurisdictions: City of Inglewood, City of Culver City, City of Hawthorne, City of Los

Angeles, and the County of Los Angeles. For purposes of this analysis, it is assumed that all of the jurisdictions above, with the exception of the City of Los Angeles, are served by the SCE. Since electricity demands generated within the City of Los Angeles would be served by the LADWP, it is not reasonable to include the electricity demands generated by those related projects located within the City of Los Angeles, and therefore, they are not included in this calculation for cumulative electricity demand impacts associated with the Proposed Project. As shown in Table IV.J-14, Projected Cumulative Electricity Consumption, the total consumption by the related projects located within the City of Inglewood, City of Culver City, City of Hawthorne, and the County of Los Angeles in combination with the Proposed Project is estimated to be approximately 125,006,565 kilowatts per year. Electricity consumed by the Proposed Project would contribute approximately 5.5 percent of the total electricity consumption by these related projects.

**Table IV.J-14**  
**Projected Cumulative Electricity Consumption**

<b>Related Projects - Grouped by Land Use</b>	<b>Size</b>	<b>Unit</b>	<b>Consumption Rate (kilowatt hours/unit/year)<sup>a</sup></b>	<b>Total (KW-Hr/Year)</b>
Retail	5,131,668	sf	13.55	69,534,101
Grocery Store	25,506	sf	53.30	1,359,470
Dwelling Units	3,401	du	5,626.50	19,135,727
Hotel	222,875	sf	9.95	2,217,606
School/Day Care	221,842	sf	10.5	2,329,341
Miscellaneous	622,371	sf	10.5	6,534,896
Office	1,270,562	sf	12.95	16,453,778
Warehouse	15,774	sf	4.35	68,617
Restaurant	11,300	sf	47.45	536,185
<b>Related Projects Total</b>				<b>118,169,721</b>
<b>Proposed Project Net Total</b>				<b>6,836,844</b>
<b>Cumulative Total</b>				<b>125,006,565</b>
<b>Proposed Project Percent of Total</b>				<b>5.5%</b>
<sup>a</sup> Utility rates provided by SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993. Source: Christopher A. Joseph & Associates, July 2007.				

The cumulative effects of the Proposed Project in combination with related projects may require SCE to construct additional distribution facilities in the near future. It is impossible to determine the infrastructure specifically required given the uncertainty of the timeframe for implementing the related projects. In accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. Compliance with Title 24 energy conservation standards and other energy conservation programs on the local level will be similarly imposed and would further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant.

## Natural Gas

Implementation of the Proposed Project in conjunction with the related projects identified in Section III (Related Projects) would further increase demands for natural gas. The Related Projects List provided in Section III includes related projects located throughout the following jurisdictions: City of Inglewood, City of Culver City, City of Hawthorne, City of Los Angeles, and the County of Los Angeles. For purposes of this analysis, it is assumed that all of the jurisdictions above are served by the SCG. As shown in Table IV.J-15, Projected Cumulative Natural Gas Consumption, the total consumption by the related projects in combination with the Proposed Project is estimated to be approximately 106,061,866 cf per month. Natural Gas consumed by the Proposed Project would contribute approximately 19 percent of the total consumption by these related projects. As a public utility provider, the SCG continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area. Compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the Gas Company's ability to serve each project. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

**Table IV.J-15**  
**Projected Cumulative Natural Gas Consumption**

Related Projects - Grouped by Land Use	Size	Unit	Consumption Rate (cf/unit/month) <sup>a</sup>	Total (cf/month)
Retail	7,449,048	sf	3	22,347,144
Dwelling Units	7,726	du	6,665	51,493,790
Hotel	644,227	sf	5	3,221,135
Office	4,544,911	sf	2	9,089,822
<b>Related Projects Total</b>				<b>86,151,891</b>
<b>Proposed Project Net Total</b>				<b>19,909,975</b>
<b>Cumulative Total</b>				<b>106,061,866</b>
<b>Proposed Project Percent of Total</b>				<b>19%</b>
<sup>a</sup> Utility rates provided by SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993. Source: Christopher A. Joseph & Associates, July 2008.				

## PROJECT DESIGN FEATURES

PDF's to implement energy conservation measures in accordance with the Sustainability Checklist contained in the Hollywood Park Specific Plan are identified in Section IV.B, Air Quality.

## MITIGATION MEASURES

No mitigation measures are required.

## LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts upon electricity and natural gas services would be less than significant.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**4. SOLID WASTE**

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**ENVIRONMENTAL SETTING**

Solid waste management is provided to the City of Inglewood by Waste Management. The Refuse Division of the City General Services Department collects refuse from the majority of single-family homes and some multi-family complexes, commercial and industrial sectors within the City. The primary facilities that currently serve the City are the City of Inglewood Transfer Station and the Carson Transfer Station, which transfer solid waste to the Puente Hills Landfill in Whittier and the El Sobrante Landfill located in Riverside County, California.<sup>36</sup>

The Puente Hills Landfill, located in Whittier, is permitted to accept up to 24,000 cubic yards (13,200 tons) per day, six days per week, and is permitted to operate through the year 2013. The Puente Hills Landfill has a total of approximately 66 million cubic yards (36.3 million tons) of capacity, which at the maximum permitted daily capacity equates to an estimated nine years remaining life. In 2004 the average daily waste quantities disposed of were 22,345 cubic yards (12,290 tons).<sup>37</sup>

The El Sobrante Landfill is located in western Riverside County, and currently has 495 acres permitted for disposal activities with more than 165 million cubic yards (90.75 million tons) of remaining capacity. The El Sobrante Landfill can accept up to 10,000 tons per day of waste from the counties of Riverside, Los Angeles, Orange, San Diego, and San Bernardino, and currently has 25,000 tons of weekly capacity available.<sup>38</sup>

Waste disposal sites or landfills are operated by the County of Los Angeles (County), as well as by private companies. In addition, transfer stations are utilized to temporarily store debris until larger hauling trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a landfill's particular jurisdiction and/or watershed boundary; (2) tonnage permit limitations; and (3) operational constraints.

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<sup>36</sup> *City of Inglewood General Plan Update Technical Background Report, 3.4-1.*

<sup>37</sup> *Los Angeles County Department of Public Works, Los Angeles County Integrated Waste Management Plan 2004 Annual Update, February 2006.*

<sup>38</sup> *City of Inglewood General Plan Update Technical Background Report, 3.4-3.*

## Regulatory Framework

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, the Act requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. The Act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 past the year 2000. The Act also requires each city and county to promote source reduction, recycling, and safe disposal or transformation.

AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (SRRE) to describe how it would reach the goals. The SRRE contains programs and policies for fulfillment of the goals of the Act, including the above-noted diversion goals and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the CIWMB to update it on their progress toward the AB 939 goals. To date, implementation of AB 939 has proven to be a successful method of reducing landfill waste in the City. The City of Inglewood's AB 939 diversion rate is currently approximately 44%.<sup>39</sup>

Furthermore, facility expansions and new landfills are continuously being sought as existing facility capacity diminishes. Details related to construction- and operation-related solid waste impacts are discussed, below.

## ENVIRONMENTAL IMPACT

### Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact to solid waste services would normally occur if:

- (a) The landfill serving the Proposed Project did not have sufficient permitted capacity to accommodate the project's solid waste disposal needs;
- (b) The Proposed Project would not comply with federal, state and local statutes and regulations related to solid waste.

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<sup>39</sup> City of Inglewood, *Public Works: Waste Collection*, website: [http://cityofinglewood.org/depts/pw/divisions/public\\_services/waste\\_collection.asp](http://cityofinglewood.org/depts/pw/divisions/public_services/waste_collection.asp), October 3, 2006.

## Impacts Determined to be Less Than Significant

With respect to CEQA Checklist Question (b), above, the construction and operation of the Proposed Project would be required to adhere to all applicable federal, State, and local statutes and regulations related to solid waste. No impacts would occur associated with compliance with the federal, State, or local statutes and regulations related to solid waste and no further analysis is warranted.

### Project Impacts

#### Construction

Construction of the Proposed Project will generate demolition and construction debris that will need to be disposed of at area landfills and/or recycled. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and a variety of other miscellaneous and composite materials. Based on national averages for residential and commercial projects, construction of the Proposed Project is estimated to generate approximately 80,595 tons of construction and demolition debris (see Table IV.J-16, Estimated Construction and Demolition Debris, below).

**Table IV.J-16  
Estimated Construction and Demolition Debris**

Construction Activity	Size (sf)	Rate (lbs./sf) <sup>a</sup>	Generated Waste (tons/sf)
<b>Demolition-Existing Uses</b>			
Main Building/Grandstand	594,000	155	46,035
Casino/Pavilion	280,000 <sup>b</sup>	155	21,700
		<b>Subtotal</b>	<b>67,735</b>
<b>Construction-Proposed Project</b>			
Residential <sup>c</sup>	2,995 units	4.38	9,839
HOA Facility	10,000 sf	3.89	19
Office/Commercial	75,000 sf	3.89	146
Retail	620,000 sf	3.89	1,206
Casino/OTB	120,000 sf	17.67 <sup>e</sup>	1,060
Hotel			
Rooms	300 rooms <sup>d</sup>	3.89	408
Meeting Space	20,000 sf	3.89	39
Civic Use <sup>e</sup>	4 AC <sup>f</sup>	3.89	143
Open Space	25 acres	N/A	-
		<b>Subtotal</b>	<b>12,860</b>
		<b>Total</b>	<b>80,595</b>
<sup>a</sup> Generation rates for demolition, construction and renovation are derived from the <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i> , U.S.E.P.A., Report No. EPA530-R-98-101, June 1998. <sup>b</sup> The total area of the Casino Pavilion that is estimated to be demolished is based on 400,000 sf of floor area minus 120,000 sf that is proposed to be renovated. <sup>c</sup> Assumes an average of 1,500 sf per dwelling unit. <sup>d</sup> Based on an average of 700 sf per hotel room. <sup>e</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use. <sup>f</sup> Based on California Department of Education, 2000, <i>Guide to School Site Analysis and Development</i> . A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). <sup>g</sup> Based on renovation rate provided in <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i> , U.S. E.P.A., June, 1998. Source: Christopher A. Joseph & Associates, July 2008.			

Construction and demolition debris would be generated over several phases of development, which are anticipated to be complete in 2014. The Proposed Project would implement an on-site recycling program that would include crushing and recycling asphalt and concrete materials on-site to the maximum extent feasible. The Puente Hills and El Sobrante Landfills would likely be the primary disposal and recycling site used for demolition and construction debris. The combined remaining landfill capacity at the Puente Hills and El Sobrante Landfills is in excess of 200 million tons. Construction of the Proposed Project is anticipated to generate approximately 80,595 tons of solid waste, representing approximately .04 percent of the total available landfill capacity. Therefore construction related solid waste could be accommodated by existing landfills and impacts would be less than significant.

### Operational Impacts

With respect to threshold (a), operation of the Proposed Project would cause an on-going generation of solid waste throughout the lifespan of the Project. Upon full occupancy, the Proposed Project's residential and commercial uses would generate approximately 12,461 net pounds (6.2 tons) of solid waste per day, or approximately 2,263 tons per year (see Table IV.J-17, Estimated Operational Solid Waste Generation by Proposed Project, below).

**Table IV.J-17  
Estimated Operational Solid Waste Generation by Proposed Project**

Land Use	Unit/Quantity	Generation Rate <sup>a</sup> (lbs/unit/day)	Total (Pounds/Day)
<b>Existing Uses</b>			
Main Building/Grandstand	594,000	.006	3,564
Pavilion <sup>b</sup>	280,000	.005	1,400
		<i>Subtotal</i>	<b>4,964</b>
<b>Proposed Project</b>			
Residential	2,995 units	4.00 lbs/unit/day	11,980
HOA Facility	10,000 sf	0.006 lbs/sf/day	60
Office/Commercial	75,000 sf	0.006 lbs/sf/day	450
Retail	620,000 sf	0.005 lbs/sf/day	3,100
Casino/OTB	120,000 sf	0.005 lbs/sf/day	600
Hotel			
Rooms	300 rooms	2.0 lbs/room/day	600
Meeting Space	20,000 sf	0.006 lbs/sf/day	120
Civic Use <sup>c</sup>	4 AC	0.007 lbs/sf/day	515
Open Space	25 AC	--	--
		<i>Subtotal</i>	<b>17,425</b>
		<b>Net Total</b>	<b>12,461</b>
<sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table. <sup>b</sup> Does not include the Pavilion outdoor seating area which has been abandoned and is not in use. <sup>c</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2007.			



All solid waste generating activities within the City of Inglewood, which includes the Proposed Project, are subject to the requirements set forth in AB 939. Therefore, it is anticipated that the Proposed Project would divert 50 percent of its solid waste through on-site recycling efforts (see PFDs IV.J-4.1 and IV.J-4.2, below). Nonetheless, while the Puente Hills and El Sobrante Landfills have adequate capacity to serve the Proposed Project upon project buildout in 2014, there is some data that suggests that there is insufficient permitted disposal capacity within the region to provide for long term disposal needs. Because the Proposed Project would generate additional solid waste throughout the life of the project and beyond the expected life of the landfills serving the Project Site, operational solid waste impacts would be considered significant and unavoidable.

### **Land Use Equivalency Program Impacts**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

Solid waste impacts pertaining to construction activities under the Equivalency Program would be nearly identical to the Proposed Project and would not result in a substantial increase in solid waste impacts, given the similarity in nature and intensity of construction activities under all development scenarios. Furthermore, operational impacts to collection routes under the Equivalency Program would be similar to the Proposed Project, as the Land Use Equivalency Program would have a similar need for solid waste collection routes.

Under the Equivalency Program, as with the Proposed Project, all solid-waste-generating activities within the City of Inglewood are subject to the requirements of AB 939. Therefore, it is anticipated that, as with the Proposed Project, the Equivalency Program would divert 50 percent of its solid waste through on-site recycling efforts. As with the Proposed Project, it is anticipated that subsequent to buildout in 2014 there will be insufficient permitted disposal capacity within the region to provide for long term disposal needs, and as such solid waste impacts, under the Land Use Equivalency Program as with the Proposed Project, would be considered significant and unavoidable.

As shown in Table IV.J-18, below, as compared to the Proposed Project, the fluctuations in solid waste generation under all the Equivalency Program scenarios are equal to or less than 13 percent. The amount of daily solid waste would increase by approximately 8 to 9 percent under the Maximum Housing Alternatives. The amount of solid waste generation under the Maximum Retail, Maximum Office/Commercial, and Maximum Hotel scenarios would be negligible as compared to the amount of solid waste estimated to be generated by the Proposed Project. As with the Proposed Project, all Project Design Features and Mitigation Measures would be applied under the Land Use Equivalency Program. However, the impacts associated with solid waste generation under the Proposed Project, including the Land Use Equivalency Program, would be significant and unavoidable.

**Table IV.J-18**  
**Estimated Solid Waste Generation Under the Proposed Land Use Equivalency Program**

Development Scenario	Solid Waste Generation (lbs./day)	Over (Under) Proposed Project (lbs./day)	Percent Change From Proposed Project
<b>Proposed Project</b>	17,425	--	--
<b>Equivalency Scenarios</b>			
Maximum Housing 1	18,996	1,541	8.84%
Maximum Housing 2	18,946	1,521	8.73%
Maximum Housing 3	18,990	1,565	8.98%
Maximum Retail	17,330	(95)	-0.55%
Maximum Office/Commercial	17,609	183	1.05%
Maximum Hotel	17,450	25	0.14%
<i>Source: Christopher A. Joseph &amp; Associates, July 2008 (Equivalency Calculation Worksheets are provided in Appendix I.)</i>			

## CUMULATIVE IMPACTS

Implementation of the Proposed Project, as with the Land Use Equivalency Program, in conjunction with the related projects identified in Section III (Related Projects) would further increase regional demands on landfill capacity. The total solid waste generation by the Proposed Project and the related projects would be approximately 219,666 pounds per day (see Table IV.J-19, Projected Cumulative Solid Waste Generation).

**Table IV.J-19**  
**Projected Cumulative Solid Waste Generation**

Related Projects - Grouped by Land Use	Size	Unit	Generation Rate (pounds/day) <sup>a</sup>	Total (pounds/day)
Commercial Retail	5,468,813	sf	0.005 lbs/sf/day	27,344
Dwelling Units	7,717	du	10 lbs/du/day	77,170
Hotel	500	rm	2 lbs/rm/day	1,000
Office	3,950,112	sf	0.006 lbs/sf/day	23,701
Warehouse	15,774	sf	0.005lbs/sf/day	79
Civic Uses	1,397,884	sf	0.005 lbs/sf/day	6,989
Industrial	1,129,900	sf	0.063 lbs/sf/day	71,127
<b>Related Projects Total</b>				<b>207,410</b>
<b>Proposed Project Net Total</b>				<b>12,256</b>
<b>Cumulative Total</b>				<b>219,666</b>
<b>Proposed Project Percent of Total</b>				<b>5.6 %</b>
<sup>a</sup> Based on data in City of Los Angeles Bureau of Sanitation, Solid Waste Generation, 1981 and the California Integrated Waste Management Board, Estimated Solid Waste Generation Rates, website:				
<sup>b</sup> Dwelling units generation rate based on 2-room units.				
<i>Source: Christopher A. Joseph &amp; Associates, July 2007.</i>				

As with the Proposed Project, related projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. Although there is currently adequate capacity to accommodate the cumulative disposal needs of the Proposed Project and related projects, continued capacity is not foreseeable beyond the year 2015. While there is currently adequate capacity to accommodate the cumulative disposal needs of the Proposed Project and related projects, existing landfills within the region have a finite capacity to accommodate long-term solid waste needs of the region. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) cumulative solid waste impacts would be significant and unavoidable.

## **PROJECT DESIGN FEATURES**

The following PDF's are proposed to be incorporated in to the project description and were used in the basis for formulating portions of the environmental analysis with respect to solid waste. As such, it is recommended that the lead agency incorporate the following PDFs as conditions of project approval.

- PDF J.4-1. 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.
- PDF J.4-2. The Proposed Project shall follow all applicable City of Inglewood policies related to curbside collection and recycling programs.
- PDF J.4-3. The Proposed Project shall recycle construction and demolition waste.

## **MITIGATION MEASURES**

The Proposed Project will incorporate the PDFs identified above to reduce the project's generation of solid waste to the maximum extent feasible. No additional feasible mitigation measures have been identified.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Construction-related impacts upon solid waste services and landfill capacity would be less than significant on a project-specific level, as the Puente Hills and El Sorbante Landfills have adequate capacity through the buildout of the Proposed Project.

Operational-related solid waste impacts would be significant and unavoidable as regional landfill capacity for the life of the Project beyond 2015 has not been accommodated. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) operational solid waste impacts would be significant and unavoidable on project-specific and cumulative level.

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**ENVIRONMENTAL IMPACT ANALYSIS**  
**J. PUBLIC UTILITIES**  
**5. STORM DRAINS**

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Storm drainage systems within the City of Inglewood and Project Site are addressed in Section IV.F. Hydrology/Water Quality.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**K. PUBLIC SERVICES**  
**1. POLICE SERVICES**

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**ENVIRONMENTAL SETTING**

**Inglewood Police Department**

The Inglewood Police Department (IPD) is the local law enforcement agency responsible for providing police protection service to the Proposed Project Site and immediate project vicinity. The City is divided into four geographical police beats. Beat 1 consists of the portion of Inglewood north of Manchester Boulevard and west of Prairie Avenue and Florence Avenue. Beat 2 has jurisdiction in Inglewood south of Manchester Boulevard and west of Prairie Avenue. Beat 3 consists of the portion of Inglewood north of Century Boulevard and east of Prairie Avenue. Beat 4 consists of the portion of Inglewood south of Century Boulevard and east of Prairie Avenue. The Project Site is within the boundaries of Beat 3 as depicted in Figure IV.K-1.

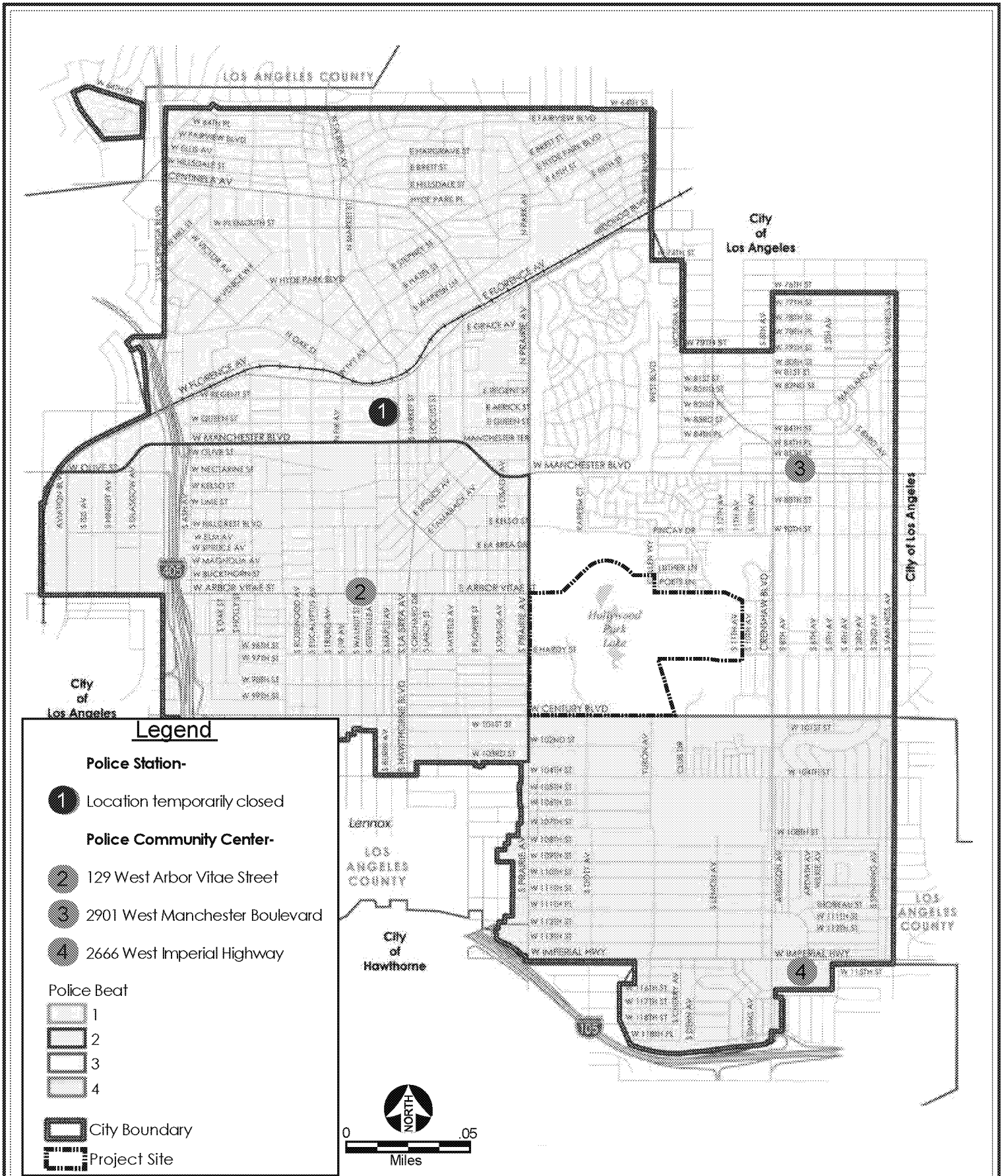
*Crime Analysis*

The Police Department's Crime Analysis Unit, based on the Department's crime data base, supplied the following analysis:

The Project Site is located in Police Reporting District (RD) 27, which consists of Hollywood Park Race Track and a Pavilion/Casino. RD 27 is bordered by Prairie Avenue to the west, 90<sup>th</sup> Street to the north, Century Boulevard to the south and the stable area east of the race track. The surrounding residential areas east of the site (including Darby Park) are located in RD 26.

In 2006, 3,987 Part I crimes, (arson, assault, auto theft, burglary, homicides, rape, robbery, theft) were reported Citywide. In 2006, 14 Part I crimes (excluding arson) were reported in RD 26 and 50 Part I crimes were reported in RD 27 with larceny and auto theft as the leading crimes. From January 1, 2007 to September 30, 2007, 2,973 Part I crimes were reported citywide. From January 1, 2007 to November 18, 2007, 27 Part I crimes were reported in RD 26 and 34 Part I crimes were reported in RD 27 with larceny and auto theft as the leading crimes.

Table IV.K-1 provides crime statistics for the City of Inglewood for the years 2005 and 2006. As the table demonstrates, the overall crime rate has generally decreased by 7 percent over the past year citywide. There were approximately 3,982 crimes reported in 2006, compared to 4,259 crimes reported during 2005. While the City has experienced a decrease in crimes classified as rape, robbery, burglary, and larceny, crimes classified as homicides and auto theft have increased by 38 and 15 percent, respectively.



Source: City of Inglewood General Plan Update Technical Background Report, August 2006; Figure 6.6-1.



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Figure IV.K-1  
City of Inglewood Police Service Area  
And Police Station Location Map

**Table IV.K-1  
City of Inglewood Crime Statistics**

Type of Crime	City of Inglewood		
	Year 2005	Year 2006	% Change From 2005
Homicide	26	36	38%
Rape	47	36	-23%
Robbery	556	481	-13%
Aggravated Assaults	434	502	16%
Burglary	821	675	-18%
Larceny (Theft)	1,452	1,194	-18%
Auto Theft	923	1,058	15%
<b>Total</b>	<b>4,259</b>	<b>3,982</b>	<b>-7%</b>

*Source: City of Inglewood, California Crime Summary December 2006, website: <http://www.cityofinglewood.org/civica/filebank/blobdload.asp?BlobID=3928> (March 12, 2007)*

### ***Police Personnel Analysis***

The Inglewood Police Department is authorized for 213 sworn and 92 full-time non-sworn positions. Currently, the Police Department employs 187 sworn officers (including all services under the Department Bureaus) and 79 full-time civilian employees. There are no Police Reserves at this time.

Based on current City/County population and housing estimates provided by the California Department of Finance Demographic Research Unit, the City of Inglewood had a resident population of 118,878 persons. Based on the number of authorized sworn officers, this equates to a service ratio of approximately 1.8 officers per 1,000 inhabitants. When compared to the number of employed officers currently maintained by the IPD, the service ratio is approximately 1.6 officers per 1,000 inhabitants. Per the Department of Justice, the current national ratio of full-time law enforcement officers is 2.4 per 1,000 inhabitants for a population of more than 100,000.<sup>1</sup> Thus, the level of law enforcement officers for the City of Inglewood reflects a ratio that is considerably lower than the national 2.4 mean ratio.

### **Response Times**

The IPD does not set a minimum service ratio, and additions to the Police Department are made at the recommendation of department heads on an as-needed basis. Between January 1, 2005 and December 1, 2005, the average emergency response times were as follows: 6.47 minutes for morning watch, 7.48 minutes for day watch, and 6.80 minutes for evening watch. Between January 1, 2005 and December 1, 2005, the average non-emergency response times were as follows: 8.43 minutes for morning watch, 10.02

<sup>1</sup> U.S. Uniform Crime Reports, 2006, Department of Justice, Police Employees.

minutes for day watch, and 9.97 minutes for evening watch. These response times were considered acceptable for the Police Department.<sup>2</sup>

## ENVIRONMENTAL IMPACT

### Methodology

Impacts upon police protection services have been evaluated in consultation with the IPD. The following analysis is based on citywide statistics and information contained in the City of Inglewood General Plan Update Technical Background Report, August 2006, recent demographic statistics provided by the State of California Department of Finance, and written correspondence provided by Jacqueline Seabrooks, Chief of Police, IPD, dated November 29, 2007. The determination of impacts upon police services is based on an assessment of the current staffing levels within the IPD, the current and historic crime rates within the City, the incorporation of crime prevention design features in the project design, and the IPD's determination regarding their ability to provide adequate police protection service to the project.

The IPD's assessment of project impacts was based on the following Crime Prevention Through Environmental Design (CPTED) concepts:

- (1) Surveillance: Involves the location and use of physical features, electrical and mechanical devices to enhance visibility by the public. It creates a risk of detection for intruders and offenders and a perception of safety for legitimate users.
- (2) Access and Control: Employs measures to create a perception of risk to offenders and deny them access to targets; guides legitimate users safely through the environment.
- (3) Territoriality: Uses physical features and activities to express ownership and control of the environment. Discourages presence of outsiders by delineating private and semi-private spaces, controlling the movement of people and vehicles and making one responsible for maintaining all spaces in the area.
- (4) Target Hardening and Maintenance: Accomplished by features that prohibit unauthorized entry or access, such as window locks, deadbolts, alarm systems and access controls.

### *Evaluation of Demand For Police Services*

The following Three-D Approach is one of the CPTED's usage concepts to determine if this Project Site would result in any impacts to public services, such as police protection, and whether the proposed development would be adequately served by current police protection service levels.

1. Designation: What is the intended use of the area and what behavior is allowed? For example, if a space has no designated purpose or is poorly defined or is not properly

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<sup>2</sup> 6.6 Police Services, City of Inglewood General Plan Update Technical Background Report, August 2006.



- designated to support and control the intended function, that space may generate crime and fear.
2. Definition: What are the physical limits of the area? What are the borders between this area and public spaces? Is it clear which activities are allowed where and what risk can be anticipated and planned for?
  3. Design: Does the physical environment support the intended use safely and efficiently?

### **Thresholds of Significance**

In accordance with Appendix G of the State CEQA Guidelines, a significant impact could occur if a project were to:

- (a) Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services.

### **Impacts Determined to be Less Than Significant**

No impacts associated with police services were identified in the Initial Study to be less than significant.

### **Project Impacts**

#### ***Short-Term Construction Impacts***

Construction sites can be sources of nuisances, providing hazards and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement. The construction of the Proposed Project would therefore present a potentially significant impact on police protection services. However, the Proposed Project would employ mitigation measures including erecting temporary fencing around the construction site to discourage trespassers and deploying roving security guards to monitor the construction site and deter any potential criminal activity. These mitigation measures would diminish the need for police services during construction of the Proposed Project and reduce the potentially significant impact to less than significant.

Access and circulation to the Project Site and on roadways surrounding the construction site could be adversely affected by construction activities such as delivery schedules and temporary road/lane closures for utility upgrades in the right-of-way. As discussed in Section IV.L, Traffic/Transportation, construction of the Proposed Project would have the potential to create some traffic impacts in the vicinity of the Project Site. Generally, construction workers would be expected to arrive and depart the site outside of the normal peak hours, i.e., during off-peak hours. They would typically arrive at 7:00 a.m., (before the a.m. peak hour) and depart around 3:00 or 3:30 p.m. (before the evening peak hour).

The impact of construction worker trips on the a.m. peak hour and p.m. peak hour traffic is therefore expected to be negligible.

Construction truck traffic is expected to be distributed more evenly across the workday. Roadway improvements and utility upgrades under Century Boulevard and Prairie Avenue would require temporary and partial lane closures, which would have the potential to reduce emergency response times in the surrounding area. While temporary closures would be necessary for utility relocations, for delivery of materials, or for certain construction procedures, extended traffic lane closures are not expected. Nevertheless, in order to mitigate the potential temporary and short-term traffic impacts of any temporary lane and/or sidewalk closures during the construction period, a Construction Traffic Control/Management Plan would be developed to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. Implementation of this mitigation measure would serve to reduce any potential construction traffic impacts to a less than significant level.

### *Operational Impacts*

The Proposed Project would increase the level of activity on-site and would create additional demands upon the IPD. As discussed in Section IV.H, Population, Housing and Employment, the Proposed Project would introduce a net increase of approximately 8,985 new residents to the Project Site. This Project-related increase in persons on the Project Site represents approximately 7.5 percent increase to the total existing residential population of the City of Inglewood. Based on the current officer-to-inhabitant ratio that the IPD maintains (i.e., 1.6 officers per 1,000 inhabitants), the Proposed Project would generate a need for 14 new police officers. As compared to the number of sworn officers that are currently authorized for the IPD (i.e., 1.8 officers per 1,000 inhabitants), the project would generate a demand for 16 new police officers. It is anticipated that the demand for the additional staffing of 14 to 16 new police officers would be met through the increase in property tax and retail sales tax revenue that would be generated by the Proposed Project. While it is anticipated that the Proposed Project's increase in tax revenue is adequate to meet this demand, the exact allocation of funding for IPD's services would, however, be determined by the City on an annual basis during its annual budget allocation process.

In addition, based on an average 2 car garage per 2,995 units, approximately 5,990 vehicles would be generated on-site which would create a substantial increase in population and vehicles. While there is not a directly proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls requesting police responses to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase with the increase in onsite activity and increase in traffic on adjacent streets and arterials.

A potentially significant impact could occur if emergency services, such as fire and police, could not adequately serve the Project Site based upon response time, access, parking availability/circulation, and the Department's current decrease in police personnel.

A potentially significant impact may occur if the Proposed Project generates substantial population growth and demand for construction of school services. Additional school facilities would generate a demand for police services related to juvenile crimes (truancy, vandalism, and graffiti).

The Proposed Project will include an on-site police substation to be manned and operated by IPD personnel during the operating hours of the proposed retail uses. Further, the on-site IPD services will be supplemented with private security officers in an effort to provide a continuous security presence to the Project Site and surrounding neighborhood.

To further reduce the potential for increasing the demands upon police services in the area, the Proposed Project would include strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security would be controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention design features, such as nighttime security lighting, full-time onsite professional security, building security systems, and secure parking facilities (see security plan discussion, below). In addition, the continuous visible and non-visible presence of residents and employees at all times of the day would provide a sense of security during evening and early morning hours.

As part of the Proposed Project, a police substation operated by the IPD and an on-site security plan would be conceived and implemented by the Applicant in consultation with the IPD to minimize the potential for on-site crime and reduce demands upon additional IPD services. While a security plan has not yet been finalized, such a plan would be required as a condition of project approval and would be developed in consultation with the IPD Crime Prevention Unit (CPU) as part of the final plot plan review process. Such a security plan may include some or all of the following components:

- Through individual lease agreements for the proposed retail/commercial uses and property management services for the residential uses, private on-site security services shall be arranged to provide a 24-hour presence.
- Commercial parking areas shall be fitted with emergency features such as emergency call boxes that will provide a direct connection with the on-site security force or the IPD 911 emergency response system.
- For those areas that are proposed for general public access, the park and open space areas shall be maintained by the Home Owners Associations (HOA) with public access during daylight hours only.
- Low-level and directional security lighting features shall be provided to illuminate entryways, seating areas, lobbies, elevators, locker rooms, service areas, and parking areas with good illumination to minimize dead space, and to eliminate areas of concealment.

### Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's Circulation Plan. There would be no changes in building locations or site accessibility features. Development would be served by the same infrastructure and facilities as the Proposed Project.

As shown in Table IV.H-8 in Section IV.H, Population, Housing and Employment, the exchange of land uses between retail/commercial/office/hotel/residential would alter the site uses, and therefore, the size of the site's resident population and employment characteristics. In Maximum Housing Scenarios 1, 2 and 3, the exchange of land uses has the effect of increasing resident population and lowering the number of employees that could occur on the Project Site. Under the Maximum Retail and Maximum Hotel scenarios, the exchange of land uses yields the same resident population as the Proposed Project but a decrease in the number of employees on the Project Site. Under the Maximum Office/Commercial scenario, the exchange of land uses yields the same resident population as the Proposed Project but an increase in the number of employees on the Project Site.

Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in resident population, the application of the Equivalency Program may generate higher demand for police services than compared to the Proposed Project. While there is not a directly proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls requesting police responses to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase under the Equivalency Program.

In terms of measuring police service ratios, employing the City's authorized standard of service ratio of 1.8 officers per 1,000 residents that was used in the above analysis, the number of officers would increase by 3 under Maximum Housing 1, 2 and 3. It is anticipated that the demand for these 3 additional officers would be met through the increase in property tax and retail sales tax revenue that would be generated by the Project. While it is anticipated that the Equivalency Program's increase in tax revenue is adequate to meet this demand, the exact allocation of funding for IPD's services would, however, be determined by the City on an annual basis during its annual budget allocation process. As such, impacts upon police services would be mitigated in proportion to the demands that are created by the project through tax revenue financing and the City's annual budget process.

Construction related impacts under the Equivalency Program would also be comparable to the Proposed project as levels of construction activity and traffic would also be comparable. Therefore, as is the case with the Proposed Project, the construction-related impacts to police services would be less than significant when appropriate mitigation measures are implemented.

With respect to operations phase, the Land Use Equivalency Program as with the Proposed Project, would not significantly alter the response distance or emergency access since the Equivalency Program is self-contained within the Hollywood Park Specific Plan Area. A potential significant impact could occur if emergency services could not adequately serve the Project Site based on response time, access, parking availability/circulation, and the IPD's current decrease in police personnel.

A potentially significant impact may occur if the Equivalency Program generates substantial population growth and demand for construction of school services. Additional school facilities would generate a demand for police services related to juvenile crimes.

All of the recommended project design features and mitigation measures to minimize potential impacts on police protection services under the Proposed Project would be applicable to the Equivalency Program. As noted above, development under the Equivalency Program would include the same site accessibility and safety features as the Proposed Project. As noted above, the Maximum Housing 1, 2 and 3 scenarios would slightly increase the demand for police services. The Equivalency Program would generate additional revenues to the City which could be applied towards the provision of staffing requirements. The sufficiency of such funds, and a decision to allocate such funds accordingly, is a socio-economic issue which may be addressed further by the decision-makers.

## CUMULATIVE IMPACTS

The Proposed Project, in combination with ambient growth and the 39 related projects (see Section III, Related Projects), would increase the demand for police protection services in the City. The City of Inglewood has an existing police service population of approximately 118,878 persons.<sup>3</sup> As discussed in Section IV.H, Population, Housing and Employment, the Proposed Project, in conjunction with the 39 related projects located within the City of Inglewood, are estimated to generate a permanent population increase of 12,480 persons. This estimate could increase to approximately 13,995 persons under the three proposed Equivalency Program scenarios that maximize the project's housing potential to 3,500 dwelling units. Thus, under the worst case scenario, the Proposed Project combined with the 39 related projects would result in a 13,995 person cumulative increase in the police service population in the City, of which the Proposed Project would comprise approximately 75 percent.

The cumulative increase of 12,480 to 13,995 persons in terms of police service population may require additional officers to maintain the City's approved ratio of 1.8 officers per 1,000 civilians. Under this growth scenario, future development in the City could generate a demand for 22 to 25 new police officers. However, any new or expanded police station or additional police officers would be funded via existing mechanisms (i.e., sales taxes, government funding) to which the Proposed Project and related projects would contribute. In addition, similar to the Proposed Project, each of the related projects would be individually subject to IPD review, and would be required to comply with all applicable safety requirements of the IPD and the City of Inglewood in order to adequately address police protection

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<sup>3</sup> California Department of Finance Demographic Research Unit.

service demands. Impacts created by new development would be reduced by the incorporation of required security measures into each proposed development. In addition, the Proposed Project and most of the related projects include infill development, which would revitalize the City of Inglewood. Ongoing revitalization efforts would help reduce the cumulative crime impacts within the City. Therefore, cumulative impacts on police protection services would be less than significant.

## **PROJECT DESIGN FEATURES**

The following PDF's are proposed to be incorporated into the project description and were used in the basis for formulating portions of the environmental analysis with respect to police services. As such, it is recommended that the lead agency incorporate the following PDFs as conditions of project approval.

- PDF K 1-1. The Proposed Project includes the construction of a police substation within the mixed-use land use designation area.
- PDF K 1-2. As part of the Specific Plan Plot Plan review process, a Security Plan detailing measures that will be implemented to provide adequate security both within the interior and exterior of the premises will be submitted for review and approval.

## **MITIGATION MEASURES**

To ensure that potentially significant project impacts to police protection services would be less than significant; the following mitigation measures would be implemented as part of the Proposed Project:

### **Construction Mitigation Measures**

- MM K 1-1. Prior to construction the Applicant shall prepare a Construction Security and Safety Management Plan that provides for the following safety features to be implemented and maintained throughout the construction period:
- (a) The Project Contractor(s) shall erect temporary fencing around the Project Site during construction activities to secure the Project Site and discourage trespassers.
  - (b) The Project Contractor(s) shall employ security lighting to deter any potential criminal activity. Construction materials should not be accessible to the public during non-construction hours.
  - (c) Detour or other signs should be clearly marked, positioned and secured.
  - (d) All open hazardous areas, such as trenches, must be secured.
  - (e) All discarded debris should be secured during construction.
  - (f) A private security service shall patrol the site during non-construction hours.

MM K 1-2. Prior to construction, the Applicant shall prepare a Construction Traffic Control/Management Plan to minimize the effects of construction on vehicular and pedestrian circulation in the area of the Project Site.

### **Operational Mitigation Measures**

MM K 1-3. The Project Applicant shall file all building plans with the Inglewood Police Department. Plans shall include access routes, floor plans, and any other additional information that might facilitate prompt and efficient police response.

MM K 1-4. The Project Applicant shall install alarms and or/locked doors on doorways providing public access to commercial facilities.

MM K 1-5. The Project Applicant shall develop and implement a Security Plan in consultation with the IPD, outlining the security services and features to be provided in conjunction with the Proposed Project. The plan shall be coordinated with the IPD and a copy of said plan shall be filed with the IPD. Said security plan may include some or all of the following components:

(a) Surveillance.

(b) Landscaping:

- Low growing plants (thorny) under windows of commercial buildings excluding retail windows/storefronts.
- Limit shrubbery to a maximum height of 2-3 feet near windows and entrances.
- Trees should be thinned on top and width to allow natural and security lighting through them, discourage concealment, and maximize public / police visibility.
- Trees should not be adjacent to roofs or wall areas that can act as a natural ladder for burglars.
- Placements of substantial low barriers, such as evergreen hedges, can be used to create more formidable obstacles to potentially vulnerable areas and be part of Territoriality reinforcement and natural Access Control.
- Use open landscaping and see-through fencing instead (when applicable) of solid walls for boundaries where privacy or environmental noise mitigation is not needed.

(c) Lighting:

- In addition to appropriate Project Site lighting, include appropriate lighting on parking areas, sidewalks / streets, pedestrian paths.
- Light should be consistent to reduce contrast between shadows and to illuminate areas to discourage concealment.
- Lighting should not be blocked by trees or other landscaping.
- All lighting fixtures should include appropriate vandal-proof protective grating covering.
- Consider metal H.I.D. (High Intensity Discharge), metal halide wall packs and landscape down lights for energy costs, whiter lighting and safety features.

(d) Physical Security:

- Commercial windows and doors should not be obstructed by signs, displays, plants, etc., (other than signs typically associated with retail uses) in order to provide maximum visibility for police and public observations.
- Use open or see-through structures for exterior stairways, walkways, sitting areas, parking spaces, etc.
- Eliminate potential hiding or entrapment spots.
- Locate ATM's, pay phones and bike racks in well-lighted and visible areas to the public.
- Where appropriate, install emergency phones, alarms or intercoms in convenient locations for public assistance.
- Do not place heavy objects (trash and cigarette containers) near exterior glass ingresses as they can be used against the glass to gain entry.
- Locate ATM's in front of banks or well-lit and visible public areas.

(e) Access Control:

- Control or eliminate public access to warehouse, storage and service areas.
- Control and monitor employee keys, entry cards or access codes.
- Make signs legible and unambiguous. Use symbol signs where possible, to discourage access to dangerous areas, exits, emergency assistance, etc.



- Design addresses for emergency visibility and access locations. Businesses may consider roof addresses for emergency aerial personnel.
- Design public amenities to discourage misuse, such as shape benches to be comfortable for sitting, but not for sleeping. Roughen or install breaks in low walls, curbs and smooth surfaces to discourage skateboarding.
- Design curb blocks to each commercial parking lot space to discourage vehicle racing and gathering of unauthorized vehicles during closing hours.
- Install steel grating to any roof opening to deny criminal entry.
- Storage or trash areas should be secured at all times to reduce the potential for encampments, vandalism and subjects or employees to hide stolen items from the stores.
- Alarms, CCTV's, intrusion detectors and security guards can be based on the future identifications of commercial buildings.
- The use of planters can help control access to a semi-private outdoor dining area from a public area, such as a parking lot.

(f) Territoriality:

- Define clear boundaries to storage areas, private / public areas through signs, gates, landscaping and pavement treatment, such as tiles and cobblestones.
- Residential and commercial buildings should be marked and clearly visible on all sides and roofs with appropriate building identification and address numbers.
- Loading areas should not create dead-end alleys or blind spots.

(g) Target Hardening and Maintenance:

- Exterior door hardware should be a minimum of 40 inches from adjacent windows.
- Consider Astride covers for locks.
- Consider security film for windows to deter vandalism and graffiti.
- Avoid loose rocks in landscaping.

- MM K 1-6. The Project Applicant shall implement an on-site security plan in consultation with the Inglewood Police Department to provide a safe and secure environment within the proposed parks. The parks shall be designed and constructed in a manner that eliminates dead spaces and concealed areas to the maximum extent feasible. Low-level directional security lighting shall be provided to increase visibility for security personnel and passers by.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With respect to CEQA Checklist Question (a), construction and operation of the Proposed Project would not result in a substantial adverse physical impact associated with the provision of new or physically altered police protection facilities, the need for new or physically altered police protection facilities in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. The Proposed Project includes the construction of a police substation within the mixed-use land use designation area of the Project. However, the construction of this substation is ancillary to the proposed development and would be located within a commercial mixed-use building that would otherwise be constructed with or without the police substation. Thus, while the construction of the police substation would contribute to the temporary air quality and noise impacts that are anticipated during the construction process, it would not by itself generate any significant environmental impacts.

The Project would generate increased demands for police protection services. However, implementation of the Project Design Features and mitigation measures identified above would reduce the project's impact to police services to a less than significant level.

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**IV. ENVIRONMENTAL IMPACT ANALYSIS**  
**K. PUBLIC SERVICES**  
**2. FIRE PROTECTION**

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**ENVIRONMENTAL SETTING**

Fire prevention, fire suppression, and life safety services are provided throughout the City of Inglewood by the Los Angeles County Fire Department (LACoFD), as governed by the Inglewood Municipal Code, which adopted the County of Los Angeles 2001 Fire Code (“Los Angeles County Fire Code”), the California Fire Plan, and the County Pre-Fire Management Plan (2004). The Plan and the Fire Code serve as guides to City Departments, government offices, developers, and the public for the of City of Inglewood.<sup>4</sup> The LACoFD operates 9 divisions, 21 battalions, 165 fire stations and 10 fire suppression camps for 58 district cities within the County of Los Angeles. Their services include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. A professionally trained staff of 1,253 firefighters (including 635 paramedic-trained personnel) is on duty at all times at 165 fire stations located across the LACoFD’s 2,305-square-mile jurisdiction.<sup>5</sup>

**Fire Stations**

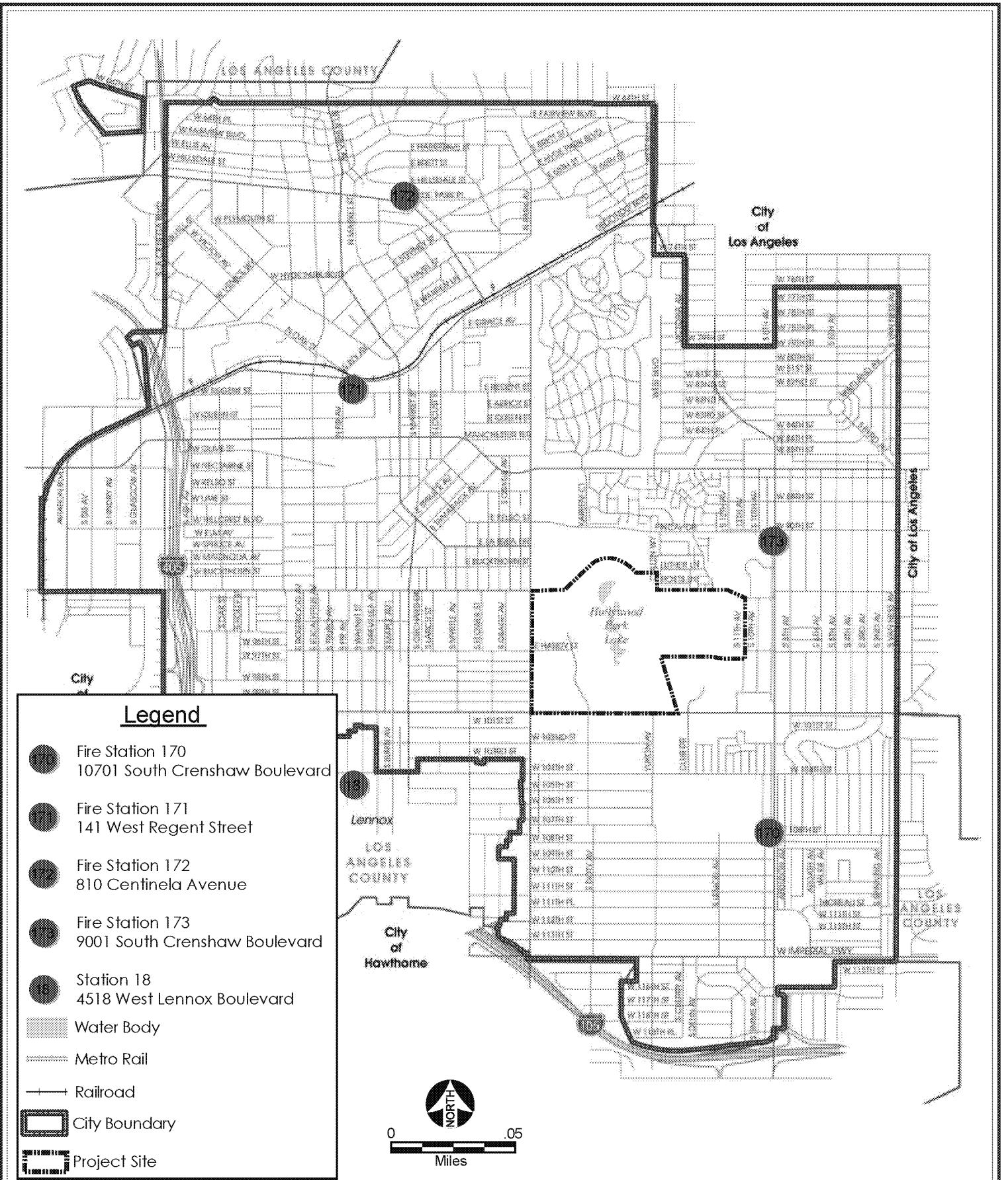
The Proposed Project is located within Division VI, Battalion 20 of the LACoFD’s jurisdiction. As of March 2006, Battalion 20 employed approximately 75 full-time staff among the five fire stations within the City. Within Battalion 20 are six fire stations: Station 14, Station 18, Station 170, Station 171, Station 172, and Station 173. Fire Station 170 is located approximately 1.7 miles from the Project Site, Fire Station 171 is approximately 2.1 miles, Fire Station 172 is approximately 1.7 miles from the Project Site, and Fire Station 173 is located approximately 1.6 miles from the Project Site (see Figure IV.K-2).

Fire Station No. 173 is located approximately 1.6 miles from the Project Site (at 9001 South Crenshaw Boulevard) and would have primary response duties to calls from the Proposed Project. Fire Station No. 173 is equipped with a 3-person engine company and 2-person paramedic squad. Fire Station No. 170, located at 10701 S. Crenshaw Boulevard, Fire Station No. 171, located at 141 W. Regent Street, and Fire Station No. 172, located at 810 Centinela Avenue, are all equipped with a 3-person engine company and 2-person

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<sup>4</sup> Los Angeles County Fire Department, 2005 Statistical Summary website: <http://fire.lacounty.gov/PDFs/StatSummary.pdf>, March 12, 2007.

<sup>5</sup> Los Angeles County Fire Department Pre-Fire Management Plan, website: <http://www.lacofd.org/Forestry/PDF/LACoFDPre-FireMgmt.pdf>, September 5, 2006.



Source: City of Inglewood General Plan Update Technical Background Report, August 2006; Figure 6.7-1.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
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Figure IV.K-2  
Los Angeles County Fire Department  
Fire Stations within the City of Inglewood

paramedic squad, and would also respond to calls from the Proposed Project. Although Station 18 is outside of City limits, it is equipped with a 4-person paramedic engine company and would be the closest unit available to service Inglewood if the need should arise.<sup>6</sup>

The LACoFD participates in automatic and mutual aid services with neighboring jurisdictions. Units from stations located outside of the City of Inglewood respond to calls on a daily basis. LACoFD emergency units are dispatched as needed to an incident anywhere in the LACoFD's service territory based on the distance and availability, without regard to the Inglewood city limits. Fire stations that also service Inglewood are located within the cities of Hawthorne, Gardena, and Lawndale, and within unincorporated communities of West Athens, Lennox, and Baldwin Hills. Additionally, the ability to manage and control major fires or other emergencies is enhanced by the Standardized Emergency Management System (SEMS).<sup>7</sup> Therefore, there are plenty of resources available to respond to a large incidence or multiple simultaneous incidences in Inglewood without the need to request mutual aid from other fire protection agencies.

### **Response Time**

Response time relates directly to the physical linear travel distance (i.e., miles between a fire station and a site) and the Fire Department's ability to successfully navigate the given accessways and adjunct circulation system. Roadway congestion and intersection level of service along the response route can affect the response distance when viewed in terms of travel time. The LACoFD uses nationally-accepted guidelines for response times in urban areas: 5 minutes for a first-responding or basic life support unit (usually an engine company) and 8 minutes for an advanced life support (paramedic) unit. In 2005, Inglewood had an average emergency response time of 4.4 minutes. The average non-emergency response time was 6.3 minutes.<sup>8</sup>

### **Fire Flow**

The adequacy of fire protection for a given area is based on required fire flow, response time from existing fire stations, and the LACoFD's judgment for assessing the needs in a given area. The required fire flow is closely related to the type and size of the land use. In general, the required fire flow is closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). The LACoFD requirement for residential projects ranges from 1,250 gallons per minute (gpm) to 5,000 gpm depending on the density of the area; however, a minimum residual water pressure of 20 pounds per square inch (psi) is required. Specifically, high-density

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<sup>6</sup> 6.7 Fire Services, *City of Inglewood General Plan Update Technical Background Report, August 2006.*

<sup>7</sup> *Ibid.*

<sup>8</sup> *Response Times and Protocol, Fire Services, City of Inglewood General Plan Update Technical Background Report, August 2006.*

residential developments require fire flows up to 5,000 gpm at 20 psi for up to a five hour duration. Single-family dwelling units require fire flows up to 1,250 per minute at 20 psi for up to a two-hour duration. Institutional uses require a fire flow up to 8,000 gpm at 20 psi for up to a four hour duration. LACoFD requirements for commercial projects are 5,000 gpm with a minimum residual water pressure of 20 psi for up to a five-hour duration. As such, fire flows and fire hydrants would be provided for the Proposed Project as required by the LACoFD.

Water for fire flows for the area surrounding the Project Site is provided by the City of Los Angeles Department of Water and Power (LADWP). All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Refer to Section IV.J.1, Water Supply, for a complete discussion of water service infrastructure in the Proposed Project area.

## **ENVIRONMENTAL IMPACT**

### **Methodology**

Impacts upon fire protection services have been evaluated in consultation with the County of Los Angeles Fire Department. The following analysis is based on the written correspondence provided by John R. Todd, Chief of Forestry Division, Prevention Services Bureau of the County of Los Angeles Fire Department, dated September 5, 2007. The Proposed Project's potential to impact fire protection services is based on the current staffing and fire response equipment within the project's services area, fire flow, accessibility, the LACoFD's determination regarding their ability to provide adequate fire protection services to the Project.

### **Thresholds of Significance**

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project were to result in the following:

- (a) Substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the fire department.

### **Impacts Determined to be Less Than Significant**

No impacts associated with fire protection services were identified in the Initial Study to be less than significant.

## **Project Impacts**

### ***Construction***

Removal of the existing onsite buildings and construction of the Proposed Project could increase the potential for accidental onsite fires from such sources as the operation of mechanical equipment, the use of flammable construction materials, and the careless disposal of cigarettes. In most cases, the implementation of “good housekeeping” procedures by the construction contractors and the work crews would minimize these hazards. Good housekeeping procedures that would be implemented during demolition and construction of the Proposed Project include: the maintenance of mechanical equipment in good operating condition; careful storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur (see “Mitigation Measures” subheading below for a complete list of requirements).

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant for the following reasons:

- (1) Construction impacts are temporary in nature and do not cause lasting effects; and
- (2) Partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the project site, flagmen would be used to facilitate the traffic flow until construction is complete.

Project construction would not be expected to impact fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LACoFD. Therefore, construction-related impacts to fire protection services would be less than significant.

### ***Operation***

Implementation of the Proposed Project would increase the need for fire protection and emergency medical services in the Hollywood Park area. The following discussion analyzes the major criteria for determining the Proposed Project’s impacts on fire protection services.

#### ***Response Distance and Emergency Access***

As discussed above, the nearest engine company is approximately 1.6 miles from the Project Site, and it would be 0.6 miles beyond the required response distance for structures not fitted with sprinkler systems. However, the nearest engine and truck companies are located approximately 1 mile from the Project Site, just within the maximum response distance. Nevertheless, due to the fact that the Proposed Project

includes the development of buildings above 75 feet in height (e.g. the hotel structure), automatic fire suppression sprinklers would be required by the Fire Code for these structures.

Emergency vehicle access to the Proposed Project Site would continue to be provided from local public roadways. Major roadways adjacent to the Project Site (i.e., Prairie Avenue and Century Boulevard) would continue to provide public and emergency access.

#### *Fire Flow*

Water service for fire fighting purposes would continue to be provided by the West Basin Municipal Water District (WBMWD). The existing water system would serve both domestic and firewater needs. As discussed above, the adequacy of fire protection for a given area is based on required fire flow; response time from existing fire stations, and the LACoFD's judgment for assessing the needs in a given area. The required fire flow is closely related to the type and size of the land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. County-established fire flow requirements, which are established in the Fire Code, vary from 1,250 gallons per minute (gpm) in low-density residential areas, to 5,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing.<sup>9</sup>

In accordance with the LACoFD standards, fire flow availability tests were undertaken at the site by the City of Inglewood on December 11, 2006. The tests were to ascertain a fire flow at 20-psi for an excess of a 3-hour duration. The results were as follows:

- Century Bl. & Club Dr., 12-inch water main, static pressure 102-psi, residual pressure 98-psi, fire flow 6,009-gpm;
- Prairie Ave. & La Brea Dr., 10-inch water main, static pressure 75-psi, residual pressure 70-psi, fire flow 4,665-gpm; and
- Pincay & Prairie, 24-inch water main, static pressure 71-psi, residual pressure 67-psi, fire flow 5,139-gpm.

Based on these results, the Project Site is adequately served by the existing water infrastructure. The Proposed Project would be designed and developed to ensure adequate fire flow is maintained through buildout of the Proposed Project. Additional hydrants would be installed throughout the development per Fire Code requirements based upon the specific land uses to be introduced (i.e., multi-family residential, commercial, and parking uses). As such, impacts related to fire flow are anticipated to be less than significant.

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<sup>9</sup> *Fire Flow and Hydrant Requirements, Los Angeles County Fire Department, website: [http://fire.lacounty.gov/FirePrevention/PDFs/Reg/jpr\\_ch7\\_8.pdf](http://fire.lacounty.gov/FirePrevention/PDFs/Reg/jpr_ch7_8.pdf), accessed April 11, 2007.*



## Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Equivalency Program, there would not be substantial variation in the Project's Circulation Plan. There would not be changes in building locations or site accessibility features. Development would be served by the same infrastructure and facilities as the Proposed Project.

As shown in Table IV.H-8 in Section IV.H, Population, Housing and Employment, the exchange of land uses between retail/commercial/office/hotel/residential would alter the site uses, and therefore, the size of the site's resident population and employment characteristics. In Maximum Housing Scenarios 1, 2 and 3, the exchange of land uses has the effect of increasing resident population and lowering the number of employees that could occur on the Project Site. Under the Maximum Retail and Maximum Hotel scenarios, the exchange of land uses yields the same resident population as the Proposed Project but a decrease in the number of employees on the Project Site. Under the Maximum Office/Commercial scenario, the exchange of land uses yields the same resident population as the Proposed Project but an increase in the number of employees on the Project Site. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in population and the Maximum Office/Commercial scenario where there is a net increase in employment, the application of the Equivalency Program may generate higher demand for fire projection services than the Proposed Project.

Construction-related impacts under the Equivalency Program would also be comparable to the Proposed Project as levels of construction activity and traffic would also be comparable. Therefore, as is the case with the Proposed Project, the construction-related impacts to fire protection services would be less than significant.

With respect to response distance and emergency access during the operations phase, the Equivalency Program as with the Proposed Project, would not significantly alter the response distance or emergency access since the Equivalency Program is self-contained within the Hollywood Park Specific Plan Area. Emergency vehicle access under the Equivalency Program, as with the Proposed Project, would continue to access the Project Site from local public roadways. Major roadways adjacent to the Project Site would continue to provide public and emergency access.

With respect to Fire Flow during the operations phase, the Equivalency Program would yield similar results as under the Proposed Project (as described above). Based on those results, the Project under the Equivalency Program is adequately served by the existing water infrastructure. As such, impacts related to fire flow are anticipated to be less than significant under the Equivalency Program.

All of the recommended project design features and mitigation measures to minimize impacts on fire protection would be applicable to the Equivalency Program, as well as the Proposed Project. Like the Proposed Project, none of the Equivalency Scenarios would require the expansion, consolidation or

relocation of an existing facility to maintain service. As such, impacts to fire protection services under the Equivalency Program would be less than significant.

## **CUMULATIVE IMPACTS**

The Proposed Project, in combination with the construction and operation of the related projects, would increase the demand for fire protection services in the Proposed Project area. Specifically, there would be increased demands for additional LACoFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (i.e., property taxes, government funding), to which the Proposed Project and related projects would contribute.

Similar to the Proposed Project, each of the related projects would be individually subject to LACoFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LACoFD and the City of Inglewood in order to adequately mitigate fire protection impacts. For example, all related projects would be required to assure that LACoFD access remains clear during all demolition and construction activities. In addition, for any residential related project more than 1.5 miles from the nearest LACoFD Engine or Truck Company, or for any commercial related project more than one mile from an LACoFD Engine Company or 1.5 miles from an LACoFD Truck Company. Building code requirements would also ensure the installation of automatic fire sprinkler systems in public buildings, in order to compensate for the additional response distance. Therefore, the Proposed Project would not have a cumulatively considerable incremental effect upon fire protection services and the Proposed Project's cumulative impact would be less than significant.

## **PROJECT DESIGN FEATURES**

No specific PDFs are proposed that are directly related to fire protection services.

## **MITIGATION MEASURES**

Although significant impacts were not identified in the above analysis, the following mitigation measures are included to highlight the project features that allow for this conclusion, as well as further ensure that project impacts to fire protection services would be less than significant:

### **Construction Mitigation Measures**

- MM K 2-1. Throughout the demolition and construction process, Fire Department access shall remain clear and unobstructed at all times.
- MM K 2-2. All Project Contractors shall implement good housekeeping procedures during demolition and construction of the Proposed Project, including maintaining mechanical equipment in good operating condition; proper storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.

### **Operational Mitigation Measures**

- MM K 2-3. The Proposed Project shall comply with all applicable code and ordinance requirements for construction, access, water mains, fire flow and hydrants. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check.
- MM K 2-4. Final fire flows shall be determined by the Los Angeles County Fire Department. Fire flow of up to 5,000 gallons per minute (gpm) at 20 pounds per square inch residual pressure for a five-hour duration may be required or as determined based on building size, building relationships, proximity to property lines and types of construction.
- MM K 2-5. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:
1. No portion of the lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.
  2. No portion of the building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.
- MM K 2-6. Internal driveways and roadways shall be no less than 26 feet and shall contain an approved turning radii of no less than 32 feet, or as approved by the Los Angeles County Fire Department.

### **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With respect to threshold (a), discussed above, the Proposed Project, including the Equivalency Program, would not result in any substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives of the fire department. Project impacts on fire protection service would be less than significant.

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## ENVIRONMENTAL IMPACT ANALYSIS

### K. PUBLIC SERVICES

#### 3. SCHOOL SERVICES

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##### INTRODUCTION

This section addresses potential impacts of the Proposed Project on public schools. Under CEQA, the analysis of environmental impacts resulting from a development project should focus on the physical effects of a project, rather than the fiscal or socio-economic effects. Where a substantial increase in enrollment resulting from a project will necessitate the construction of new schools that will require school occupants to attend different schools, the physical impacts of these effects will be addressed by the EIR; examples of such impacts might include change to traffic patterns, change to vehicle miles traveled, hence a consequential change to air quality, and change to community noise levels. This section focuses on the physical changes associated with the Project's potential for student generation.

##### ENVIRONMENTAL SETTING

Public education services are provided within the project area by the Inglewood Unified School District (IUSD). The IUSD operates a total of twenty-one schools: ten elementary schools (K-6 or K-5), four K-8 schools, two middle schools, two high schools, and three small schools that provide continuation and adult education. Table IV.K-2, IUSD School Information lists the schools and their addresses. None of these schools are located within the Project site. However, according to IUSD attendance boundaries, the Project site is located within the Lane (Warren) Elementary (K-8) School attendance area and Morningside High School attendance area. These schools are located approximately 1 mile and 0.5 miles away from the Project Site.<sup>10</sup>

A location map of the 19 schools within the ISD is provided in Figure IV.K-3 on page IV.K-26. The ISD's elementary, middle and high school enrollment boundaries are identified in Figures IV.K-4 through IV.K-6 on pages IV.K-27 through IV.K-29, respectively.

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<sup>10</sup> Distance was taken from the corner of W. Century Blvd. and Yukon Ave.

**Table IV.K-2  
IUSD School Information**

School	Grade Levels	Address
Bennett/Kew Elementary	K-5	11710 South Cherry Ave., Inglewood, CA 90303
Centinela Elementary	K-6	1123 Marlborough Ave., Inglewood, CA 90302
Freeman (Daniel) Elementary	K-6	2602 West 79 <sup>th</sup> St., Inglewood, CA 90305
Highland Elementary	K-5	430 Venice Way, Inglewood, CA 90302
Hudnall (Claude) Elementary	K-6	331 West Olive, Inglewood, CA 90301
Kelso (William H.) Elementary	K-5	809 East Kelso St., Inglewood, CA 91301
Oak Street Elementary	K-5	633 South Oak St., Inglewood, CA 90301
Payne (Buclah) Elementary	K-6	215 West 94 <sup>th</sup> St., Inglewood, CA 90301
Woodworth (Clyde) Elementary	K-6	3200 West 104 <sup>th</sup> St., Inglewood, CA 90303
Worthington Elementary	K-5	11101 Yukon Ave., Inglewood, CA 90303
Lane (Warren) Elementary	K-8	9330 South Eighth Ave., Inglewood, CA 90305
La Tijera	K-8	1415 North La Tijera Blvd., Inglewood, CA 90302
Parent (Frank D.) Elementary	K-8	5354 West 64 <sup>th</sup> St., Inglewood, CA 90302
Wilder's Preparatory Academy Chapter	K-8	830 North La Brea Ave., Inglewood, CA 90302
Crozier (George W.) Middle	6-8	151 North Grevillea Ave., Inglewood, CA 90301
Monroe (Albert F.) Middle	6-8	10711 Tenth Ave., Inglewood, CA 90303
Inglewood High	9-12	231 South Grevillea Ave., Inglewood, CA 90301
Morningside High	9-12	10500 South Yukon Ave., Inglewood, CA 90303
<i>Source: Grade configuration and schools' addresses provided by California Department of Education, School Directory.</i>		

District-wide student enrollment at IUSD has declined by 14.8 percent in the last five years. Elementary school enrollment has declined by 18.5 percent. Middle and high schools enrollment has declined by 16.4 and 3.5 percent, respectively. Table IV.K-3, IUSD Enrollment for School Years 2003/04 through 2007/08, depicts closest schools to the Project and the District's steady decline in enrollment in the last five years. Table IV.K-4, IUSD Growth for School Years 2003/04 through 2007/08, provides the percent change in enrollment between each school year.



**Legend**

- 1 Beulah Payne Elementary
  - 2 Bennett-Kew Elementary
  - 3 Centinela Elementary
  - 4 Daniel Freeman Elementary
  - 5 Highland Elementary
  - 6 W. Claude Hudnall Elementary
  - 7 William H. Kelso Elementary
  - 8 Warren Lane School (K-8)
  - 9 La Tijera School (K-8)
  - 10 Oak Street Elementary
  - 11 Frank D. Parent School (K-8)
  - 12 Woodworth Elementary
  - 13 Worthington Elementary
  - 14 G. W. Crozier Middle School
  - 15 Albert Monroe Middle School
  - 16 City Honors High School
  - 17 Hillcrest Continuation High School
  - 18 Inglewood High School
  - 19 Morningside High School
- Project Site

Source: Inglewood Unified School District, 2007.



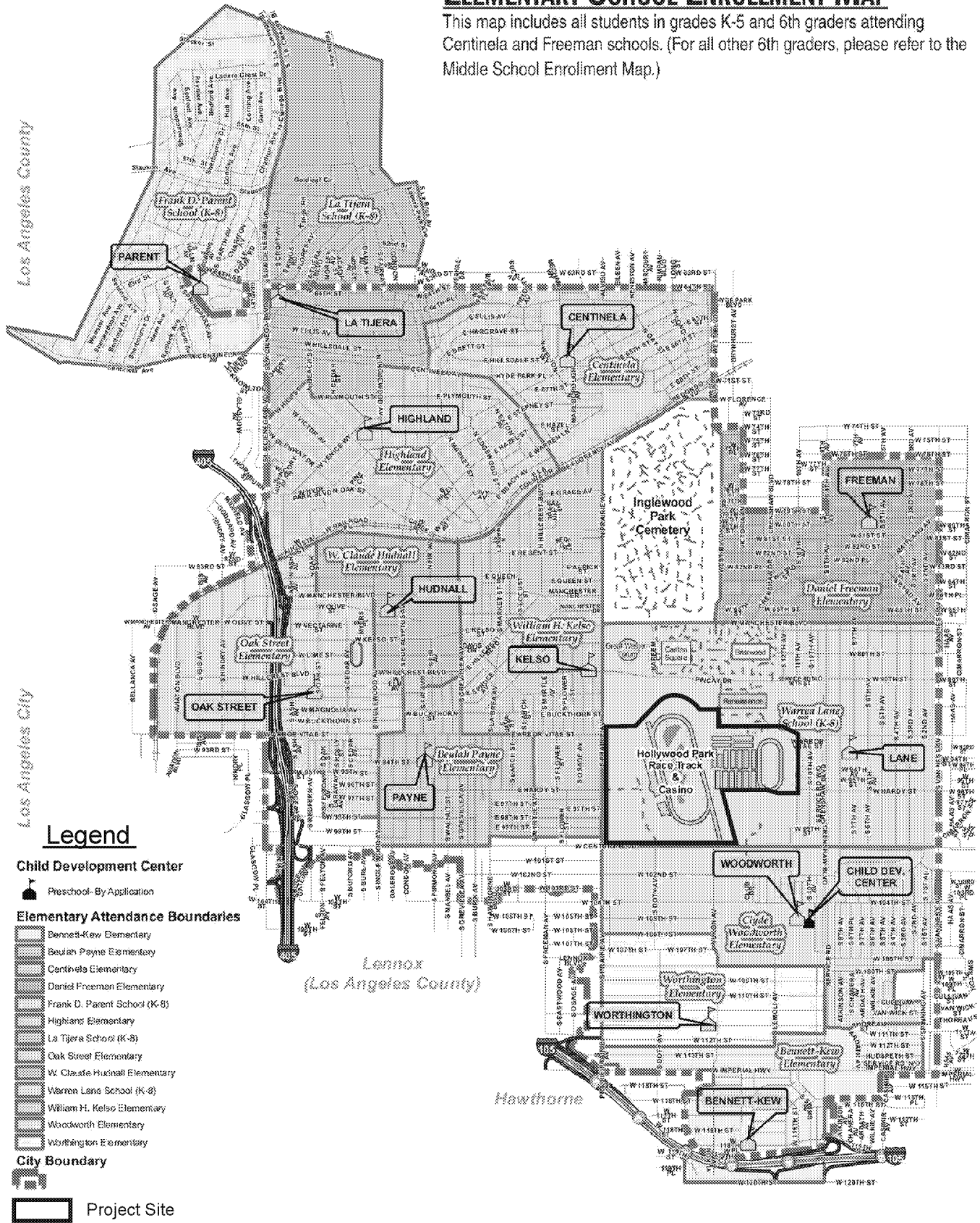
**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research



Figure IV.K-3  
IUSD School Location Map

# ELEMENTARY SCHOOL ENROLLMENT MAP

This map includes all students in grades K-5 and 6th graders attending Centinela and Freeman schools. (For all other 6th graders, please refer to the Middle School Enrollment Map.)

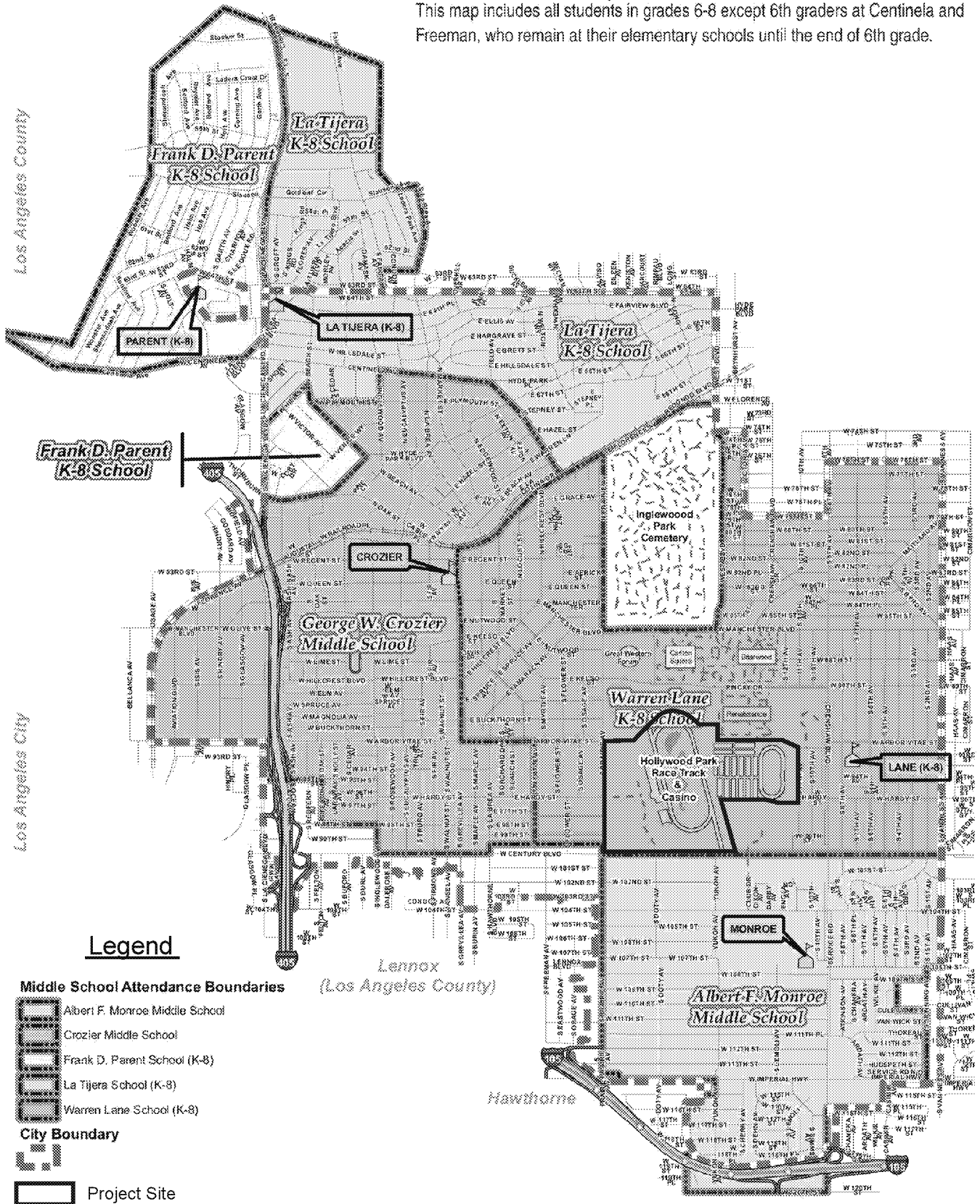


Source: Inglewood Unified School District, 2007.



# MIDDLE SCHOOL / 6-8 ENROLLMENT MAP

This map includes all students in grades 6-8 except 6th graders at Centinela and Freeman, who remain at their elementary schools until the end of 6th grade.

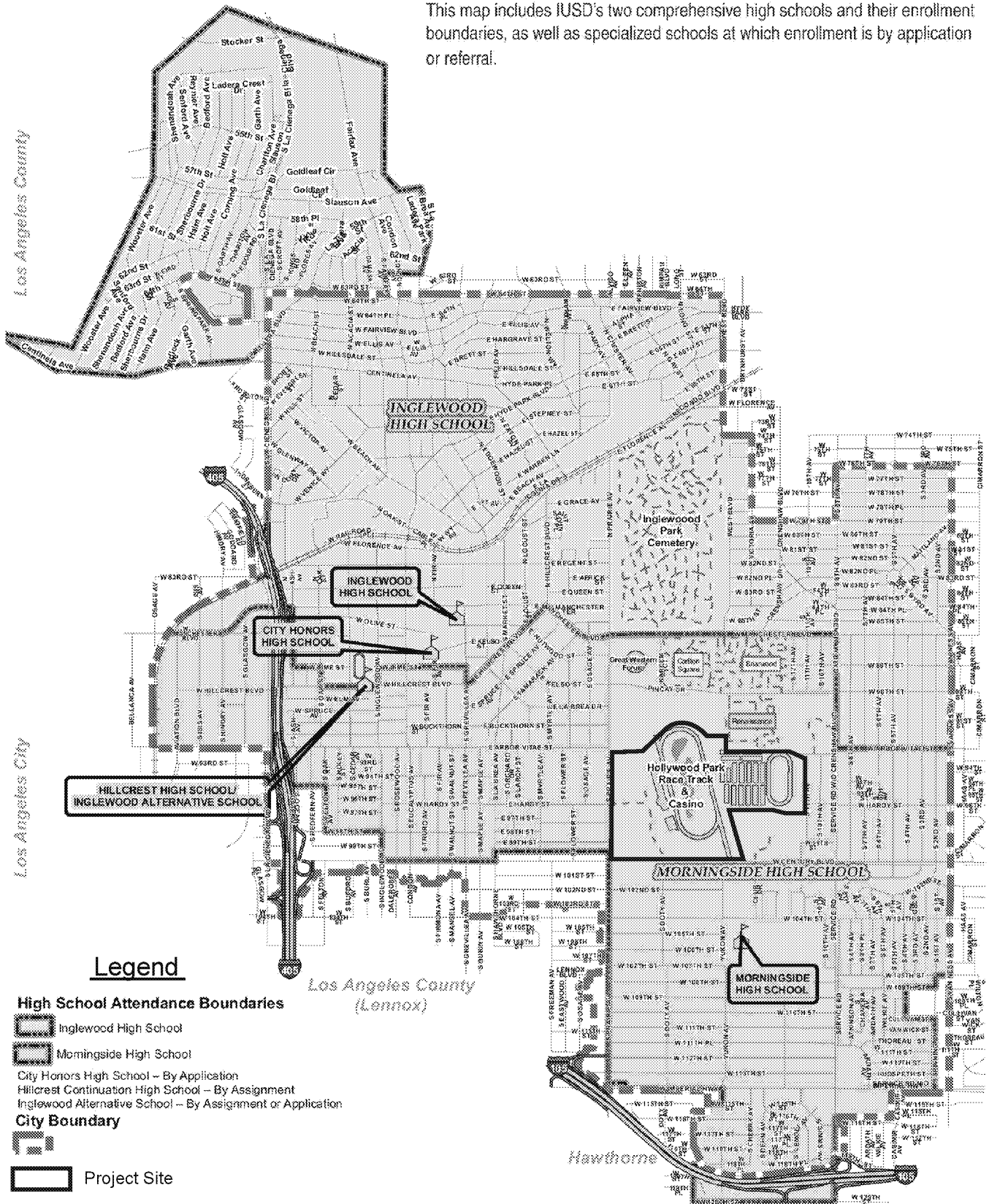


Source: Inglewood Unified School District, 2007.





# HIGH SCHOOL ENROLLMENT MAP

This map includes IUSD's two comprehensive high schools and their enrollment boundaries, as well as specialized schools at which enrollment is by application or referral.



## Legend

### High School Attendance Boundaries

-  Inglewood High School
-  Morningside High School

- City Honors High School – By Application
- Hillcrest Continuation High School – By Assignment
- Inglewood Alternative School – By Assignment or Application

### City Boundary

-  Project Site

Source: Inglewood Unified School District, 2007.

**Table IV.K-3**  
**IUSD Closest Schools Enrollment for School Years 2003/04 Through 2007/08**

	2007/08	2006/07	2005/06	2004/05	2003/04
Kelso Elementary School	783	778	789	797	841
Woodworth Elementary School	626	635	760	864	960
Lane Elementary (K-8) School	612	773	881	998	1,040
Monroe Middle School	1,120	1,148	1,186	1,268	1,364
Morningside High School	1,272	1,365	1,535	1,499	1,585
Inglewood USD	15,307	15,945	16,630	14,758	17,969

*Source: Enrollments provided by California Department of Education, Educational Demographics Unit for the 2007/08, 2006/07, 2005/06, 2004/05, and 2003/04 school years.*

**Table IV.K-4**  
**IUSD Closest Schools Growth for School Years 2003/04 through 2007/08**

	2005/06 – 2006/07	2004/05 – 2005/06	2003/04 – 2004/05	2002/03 – 2003/04	2002/03 – 2006/07
Kelso Elementary School	0.6%	-1.4%	-1.0%	-5.2%	-6.9%
Woodworth Elementary School	-1.4%	-16.4%	-12.0%	-10.0%	-34.8%
Lane Elementary (K-8) School	-20.8%	-12.3%	-11.7%	-4.0%	-41.2%
Monroe Middle School	-2.4%	-3.2%	-6.5%	-7.0%	-17.9%
Morningside High School	-6.8%	-11.1%	2.4%	-5.4%	-19.7%
Inglewood USD	-4.0%	-4.1%	-4.7%	-2.8%	-14.8%

*Source: Jeanette C. Justus Associates, May 2008.*

According to IUSD,<sup>11</sup> there is a total of 10,527 elementary school, 2,698 middle school and 4,798 high school available seats. These numbers represent those seats in permanent and temporary (portable) classroom facilities. The State has a policy of accepting portable classrooms as capacity. When all portable classrooms are included in capacity calculations, adequate capacity is available at all grade levels at IUSD for the existing enrollment. Table IV.K-5, IUSD Closest Schools Capacity and Enrollment (Year 2007/08), provides 2007-08 school year enrollment and capacity district-wide (including existing portable classrooms) as well as for Project's closest schools.

<sup>11</sup> *Source: Developer Fee Justification Study & School Facilities Needs Analysis. 2006-07 Update to District's Master Plan. Inglewood Unified School District.*

**Table IV.K-5  
IUSD Closest Schools Capacity and Enrollment (Year 2007/08)**

	Capacity	2007/08 Enrollment	Excess
Kelso Elementary School	808	783	25
Woodworth Elementary School	948	626	322
Lane Elementary (K-8) School	1,000	773	227
Monroe Middle School	1,566	1,120	446
Morningside High School	2,040	1,272	768
Inglewood USD	18,023	15,307	2,716
<i>Source: Enrollment provided by California Department of Education, Educational Demographics Unit for 2007/08 school year. Capacity provided by Developer Fee Justification Study &amp; School Facilities Needs Analysis. Inglewood Unified School District. 2006-07 school year.</i>			

However, the state allows school districts to exclude some portable classrooms such as those leased for less than five years in determining state funding eligibility. IUSD excludes some portables from their capacity calculations.<sup>12</sup>

## **REGULATORY FRAMEWORK**

### **Federal Level**

Education is mostly regulated on the State and Local levels. However, the federal government is involved in providing funding for specialized programs. These monies are mandated for specific programs (i.e., school lunches/breakfasts, Title I, Special Education) and are not used for general educational purposes. The discussions of state and local level regulations in the following sections provide information on the regulations most directly affecting the provision of education services in the area.

### **State Level**

#### ***Funding***

IUSD is under the jurisdiction of the State government and is subject to the regulations of the California Education Code and governance of the State Board of Education. School facility funds come from State funding, State bonds, local general obligation bonds, developer fees, and School Facility Improvement and Community Facilities Districts.

<sup>12</sup> *Source: Developer Fee Justification Study & School Facilities Needs Analysis. 2006-07 Update to District's Master Plan. Inglewood Unified School District.*

### *State Funding*

Historically, the State has been responsible for passing legislation for the funding of public schools. To assist in providing school facilities to serve students generated by new development projects, the State passed Assembly Bill 2926 (AB 2926) in 1986. This bill allowed school districts to collect impact fees from developers of new residential and commercial/industrial building space. Development impact fees were also referenced in the 1987 Leroy Greene Lease-Purchase Act, which required school districts to contribute a matching share of costs for construction, modernization, and reconstruction projects.

Senate Bill 50 (SB 50), which passed in 1998, provided a comprehensive school facilities financing and reform program and enabled a bond issue to be placed on the ballot. The provisions of SB 50 allowed the state to offer funding to school districts in the form of grants to acquire school sites, construct new school facilities, and modernize existing school facilities. SB 50 also established a process for determining the amount of fees developers may be charged to mitigate the impact of development on school facilities. Under this reform, a school district could charge fees above the statutory cap only under specified conditions, and then only up to the amount of funds that the district would be eligible to receive from the state. According to Government Code Section 65995, the development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.”

SB 50 establishes three levels of Developer Fees that may be imposed upon new development by the governing board of a school district depending upon certain conditions within a district. These three levels are described as follows:

Level 1: Level 1 fees are the base statutory fees, also known as “developer fees.” These amounts are the maximum that can be legally imposed upon new construction projects by a school district unless the district qualifies for a higher level of funding.

Pursuant to the California Government Code Section 65995, as of January 2008, the statutory maximum Level I school fees that may be levied by a school district on new development was increased to \$2.97 per assessable square foot of residential construction and to \$0.47 per square foot of enclosed and covered space for commercial/industrial development.<sup>13</sup> These rates are established by the State Allocation Board, who may increase the maximum fees according to the adjustment for inflation in the statewide cost index for Class B construction.

Level 2: Level 2 fees allow the school district to impose developer fees above the statutory level, up to 50 percent of new school construction costs. To implement Level 2 fees, the governing board of the school district must adopt a School Facilities Needs Analysis (SFNA), prepared in accordance with Government Code section 65995.6. The purpose of the SFNA is to determine the need for new school facilities

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<sup>13</sup> *The Office of Public School Construction defines Class B construction as buildings constructed primarily of reinforced concrete, steel frames, concrete floors, and roofs.*

attributable to growth from new residential development.<sup>14</sup> The SFNA documents that the district has met prerequisite eligibility tests and calculates the fee per square foot of new development. If the School district is eligible for new construction funding, the State will match the 50 percent funding (if funds are available). According to the Office of Public School Construction, as of May 2008, state funds for new school construction are available.

- Level 3: Level 3 fees apply if the State runs out of bond funds, allowing the school district to impose 100 percent of the cost of the school facility or mitigation minus any local dedicated school moneys.

In accordance with SB 50, construction of new schools requires the school district to match (dollar for dollar) state funds. The local match is typically provided by developer fees, local general bonds, and property tax, such as School Facility Improvement District (SFID) or Mello-Roos Community Facility District, which is a “special tax” that can be levied on property owners of newly-constructed homes within a Community Facilities District. School districts may alternatively finance new schools through special school construction funding resolutions and/or agreements between developers, the affected school districts and occasionally, other local governmental agencies.

### **School Site Selection**

The California Department of Education administers the selection of new school sites for public schools. Site selection is guided by requirements provided in School Site Selection and Approval Guide as well as the Education Code and the California Code of Regulations, Title 5 Section 14010 et seq. New schools sited within the Project area would meet the requirements set forth in the Public Resources Code Section 21151.8; Education Code Section 17213; and California Code of Regulations, Title 5, Sections 14011(h) and (i), and Title 14, Section 15093; as well as require the approval by the each district’s governing board and the California Department of Education.

### **School Size**

The amount of land needed to support a school’s educational program would correspond to the school’s proposed programs, stated goals of the school district, as well as recommendations set by the California Department of Education. The California Department of Education has published the Guide to School Site Analysis and Development to assist in determining the amount of land needed to support schools.

### **Classroom Size**

In addition to funding and school location and size, the State is also involved in deciding the structure of local schools. For instance, in August 1996, the State Senate passed SB 1777 (1996-1997 Class Size Reduction Program) and SB 1789 (Class Size Reduction Facilities Funding Program). These programs

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<sup>14</sup> Government Code Section 65995.6.

together provide incentive monies to the local school districts to lower class size for grades K-3 to a ratio of 20: 1 (students : teachers) and provide funds for additional teaching stations. However, the loading factor that the State uses to calculate school building capacity is 25 students per elementary classroom (K-5) and 27 students per middle and high school classroom (grades 6-12).<sup>15</sup>

### **Inter-district Transfers Regulation**

According to state law (AB 149 and AB 2071), parents may elect to enroll their children in public school districts whose boundaries encompass the parent's place of work, rather than the parent's place of residence, and for the school district to consider such applications. The inter-district transfer program applies to kindergarten through middle school (i.e., grades K-8) students. School districts may refuse inter-district transfers. However, grounds for such refusals include findings that the requested transfer would be to a school district that is operating at full capacity, would negatively impact a district's desegregation plan or that the additional cost of educating a student would exceed the amount of additional state aid received as a result of the transfer. Districts cannot arbitrarily refuse transfers (e.g., on the basis of race, ethnicity, sex, parental income or scholastic achievement).

## **ENVIRONMENTAL IMPACTS**

### **Methodology**

The existing conditions of the public schools serving the Project area were assessed by utilizing information provided by IUSD and California Department of Education (CDE). The assessment addresses the potential impacts of the Project on the public school system only, as it is directly responsible (and mandated) to service new student populations generated from implementation of the proposed Project. Private institutions and higher education institutions are not evaluated since they are privately funded and not mandated to provide services; therefore, these schools are not discussed herein.

The methodology used in this analysis assumes that the number of new students generated from the Proposed Project is directly and indirectly related to the type and amount of the proposed Project's residential and commercial construction. The analysis of potential Project impacts on school facilities is based on the amount of Project development occurring within the attendance boundaries of each school. Where the existing capacity appears to be inadequate for Project-generated students, the analysis includes an evaluation of the sufficiency of the school sites for the addition of new classroom capacity to accommodate Project-generated students.

According to IUSD, the District applies state-wide student yield of 0.7 per unit to its new development projections regardless of the product type (i.e. single-family detached (SFD), single-family attached (SFA), multi-family (MF), and apartments).<sup>16</sup> This rate is general, covers the entire state, and may not be

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<sup>15</sup> *School Facility Program Handbook, Office of Public School Construction, May 2008.*

<sup>16</sup> *Source: Developer Fee Justification Study & School Facilities Needs Analysis. 2006-07 Update to District's Master Plan. Inglewood Unified School District.*

representative of the new development in local areas, including IUSD. In order to establish more representative student yield, the rates from Los Angeles Unified School District (LAUSD), an IUSD neighboring school district, were applied to the Project's residential dwelling units. In February 2008, LAUSD developed student generation rates (SGR) based on an estimate of 6,793 dwelling units. These rates provide a better reflection of the proposed development because they are based on an estimation of future new development over the next five years and are broken down into product types. Table IV.K-6, Pupil per Home Ratios, identifies the student generation rates by grade level and product type used in this chapter.

**Table IV.K-6  
Pupil Per Home Ratios**

Product Type	Student Generation Rates			
	K-5	6-8	9-12	K-12
Single Family Detached	0.196	0.093	0.106	0.395
Single Family Attached	0.048	0.022	0.030	0.100
Multi-Family	0.170	0.095	0.086	0.351

*Source: Residential Development School Fee Justification Studies. Los Angeles Unified School District. February 2008.*

### Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, a project would have a significant effect on the environment if the project would result in the following:

- (a) Substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or
- (b) The need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the school district.

### Impacts Determined to be Less Than Significant

No impacts associated with school services were identified in the Initial Study to be less than significant.

### Project Impacts

#### *Construction Related Impacts*

Construction activities have the potential to generate adverse impacts associated with respect to air quality, noise, traffic and public safety. As depicted in Figure IV.K-3, there are no public school sites

located immediately adjacent to the Project Site. The Proposed Project site is, however, within approximately ¼ mile (1,300 feet) of the following eight institutional sensitive receptors: (1) Inglewood Junior Academy located approximately 75 feet west of the project site; (2) William H. Kelso Elementary School located approximately 125 feet west of the project site; (3) Greater New Bethel Baptist Church located approximately 675 feet west of the project site; (4) Holy Trinity Evangelical Lutheran Church located approximately 850 feet east of the project site; (5) First Church of God located approximately 900 feet east of the project site; (6) Inglewood Southside Christian Church located approximately 1,100 feet south of the project site; (7) Centinela Hospital located approximately 1,100 feet west of the project site; and (8) Warren Lane Elementary School located approximately 1,175 feet east of the project site.

As discussed in Section IV.B, Air Quality, localized air quality impacts such as dust and PM<sub>10</sub> emissions are generally isolated to areas within 500 feet of active construction areas involving grading activities. The Proposed Project's construction-related activities would generate significant and unmitigatable regional and localized air quality impacts which would adversely impact all of the sensitive air quality receptors identified above.

As discussed in greater detail in Section IV.G, Noise, construction of the Proposed Project would require the use of heavy equipment for demolition, site grading and excavation, installation of utilities, paving, and building fabrication. With mitigation, construction-related ambient noise levels would generally range from 73.6 to 84.1 dBA Leq at sensitive receptors nearest to the Project Site. The City of Inglewood has not put forth specific construction noise level standards or limitations. Instead, the City regulates construction noise by limiting activity to the hours identified in the Noise Ordinance and would implement mitigation measures. Construction activity associated with the project would comply with the standards established in the Noise Ordinance. However, even with mitigation, construction noise levels would exceed the five dBA significance threshold at sensitive receptors near the Project Site. As such, construction activity would result in a significant and unavoidable short-term construction noise impact.

As discussed in greater detail in Section IV.L, Traffic and Transportation, construction of the Proposed Project would require the transport and use of heavy equipment, haul trucks, and generate other construction related traffic that could affect school pedestrian routes and or drop-off and pick-up routes. It is anticipated that the haul route for the Project would either be Century Boulevard westbound to access the I-405 Freeway or Prairie Avenue southbound to access the I-105 Freeway. As such, heavy equipment and hauling activities would not directly pass by any of the IUSD school sites.

In addition to the above, construction sites have the potential to attract and endanger school aged kids if the site is not adequately secured and monitored to prevent trespassers. Accordingly, the Proposed Project Site would be secured with perimeter fencing to deter trespassers and vandals to ensure a safe and secure environment. Implementation of precautionary mitigation measures listed below would ensure that any potential impacts to student safety would be minimized to a less than significant level. Therefore, the Proposed Project with respect to construction-related activities would result in a less than significant and unavoidable impact upon public school sites due to temporary construction noise.



### Operational Impacts

The Project Site has no existing residential uses and therefore does not currently generate any students. As shown in Table IV.K-7, Estimated Student Generation by Proposed Project, the Proposed Project is anticipated to yield approximately 574 K-12 students, including 279 elementary school students, 137 middle school students, and 159 high school students. Table IV.K-7 provides the approximate student yield per product type.

**Table IV.K-7**  
**Estimated Student Generation by Proposed Project**

Product Type	Units	Student Projections			
		K-5	6-8	9-12	K-12
Single Family Detached	675	132	63	72	267
Single Family Attached	2,020	96	45	61	202
Multi-Family	300	51	29	26	105
<b>TOTAL</b>	<b>2,995</b>	<b>279</b>	<b>137</b>	<b>159</b>	<b>574</b>
<b>Classrooms<sup>a</sup></b>		<b>11</b>	<b>5</b>	<b>6</b>	<b>-</b>

<sup>a</sup> Classroom size is based on state standards of 25 students per elementary classroom and 27 students per middle and high school classrooms.

### School Needs

The Proposed Project would generate students from grades Kindergarten through 12 that would need to be accommodated either at existing or new schools, as discussed below.

### Existing Schools

*Elementary Schools:* Based on the existing school district boundary and school attendance areas, the 279 elementary school students generated from the Proposed Project would be required to attend Lane (Warren) K-8 School. Additionally, the projected students will be able to attend Kelso and Woodworth Elementary schools on a needed basis. These three schools are currently operating under capacity (Table IV.K-8, Closest Elementary Schools Capacity and Enrollment) and can accommodate the projected students. If the schools were to be expanded, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, they could be financed by State and local bond funds, as well as developer fees.<sup>17</sup>

<sup>17</sup> Government Code Section 65995(h). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

**Table IV.K-8  
Closest Elementary Schools Capacity and Enrollment**

School	2006-07 Capacity	2007/08 Enrollment	Excess/(Shortage)
Kelso Elementary School	808	783	25
Woodworth Elementary School	948	626	322
Lane Elementary (K-8) School	1,000	773	227
<i>Source: Enrollment provided by California Department of Education, Educational Demographics Unit for 2007/08 school year. Capacity provided by Developer Fee Justification Study &amp; School Facilities Needs Analysis. Inglewood Unified School District. 2006-07 school year.</i>			

*Secondary Schools:* Both middle and high schools that would serve the project area are operating under capacity (Table IV.K-9, Middle and High School Capacity and Enrollment). Monroe Middle School would serve the projected 137 middle school students, and Morningside High would serve the projected 159 high school students. These schools are operating under capacity and it is anticipated that both schools could serve the incremental increase of middle and high school students. Expansion of the existing schools, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, can be financed by State and local bond funds, as well as developer fees.

**Table IV.K-9  
Middle and High School Capacity and Enrollment**

School	2006-07 Capacity	2007/08 Enrollment	Excess/(Shortage)
Monroe Middle School	1,566	1,120	446
Morningside High School	2,040	1,272	768
Inglewood USD	18,023	15,307	2,716
<i>Source: Enrollment provided by California Department of Education, Educational Demographics Unit for 2007/08 school year. Capacity provided by Developer Fee Justification Study &amp; School Facilities Needs Analysis. Inglewood Unified School District. 2006-07 school year.</i>			

### *New Schools*

While the student projections along with existing capacity do not indicate the need for a new school, the Proposed Project has a potential site that could be used to construct a school. The Applicant and IUSD are in the process of negotiations regarding the 4-acre site within the Project that is proposed be dedicated to public use. If the Applicant and the District do not reach an agreement, the site may be utilized by other public agencies.

## School Finance

The Applicant and IUSD are discussing the possibility of a facility and financing program and mitigation agreement that would be mutually agreeable for all affected parties.<sup>18</sup> Impacts associated with the increase in student enrollment at nearby schools resulting from the Proposed Project are being jointly evaluated. The Applicant will work with IUSD to ensure that any new school developed would be built in accordance to local and state standards and requirements and are available for all Project students. If no mitigation agreement is completed, the Applicant would be required to pay the adopted Developer Fees, which would fully and completely mitigate all school impacts.<sup>19</sup> Therefore, impacts to school facilities would be less than significant.

## Land Use Equivalency Program Impacts

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site.

As shown in Table II-1, Land Use Program Equivalency Scenarios in Section II, Project Description, the exchange of land uses between retail/commercial/office/hotel to residential would alter the site uses and site population, which would result in an increase in public school students generated by the Equivalency Program. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the application of the Equivalency Program may generate higher demand for school services than compared to the Proposed Project. The resulting student generation from the Equivalency Program Maximum Housing scenarios is summarized in Table IV.K-10.

As shown in Table IV.K-10, Estimated Student Generation under the Proposed Equivalency Program is anticipated to yield approximately 625 K-12 students, including 303 elementary school students, 148 middle school students, and 174 high school students. Based on the existing school district boundary and school attendance areas, the 303 elementary school students generated under the Maximum Housing scenarios of the Equivalency Program would be required to attend Lane (Warren) K-8 School. Additionally, the projected students will be able to attend Kelso and Woodworth Elementary schools on a needed basis. These three schools are currently operating under capacity and can accommodate the projected students. If the schools were to be expanded, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, they could be financed by State and local bond funds, as well as developer fees.<sup>20</sup>

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<sup>18</sup> Government Code Section 65995.7(c). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

<sup>19</sup> Government Code Section 65995(h). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

<sup>20</sup> Government Code Section 65995 (h). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

Monroe Middle School would serve the projected 148 middle school students, and Morningside High would serve the projected 174 high school students. While these schools are operating under capacity, it is anticipated that both schools could serve the incremental increase of middle and high school students. Expansion of the existing schools, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, can be financed by State and local bond funds, as well as developer fees. As discussed above, the Applicant and IUSD are discussing the possibility of a facility and financing program and mitigation agreement that would be mutually agreeable for all affected parties. Impacts associated with the increase in student enrollment at nearby schools resulting from the Equivalency Program will be jointly evaluated. The Applicant will work with IUSD to ensure that any new school developed would be built in accordance to local and state standards and requirements and are available for all Project students. If no mitigation agreement is completed, the Applicant would be required to pay the adopted Developer Fees, which would fully and completely mitigate all school impacts. Therefore, impacts to school facilities under the Equivalency Program would be less than significant.

**Table IV.K-10  
Estimated Student Generation Under the Proposed Land Use Equivalency Program**

Product Type	Units	Student Projections			
		K-5	6-8	9-12	K-12
Single Family Detached	675	132	63	72	267
Single Family Attached	2,525	120	56	77	253
Multi-Family	300	51	29	26	105
<b>TOTAL</b>	<b>3,500</b>	<b>303</b>	<b>148</b>	<b>174</b>	<b>625</b>
<b>Classrooms<sup>a</sup></b>		<b>12</b>	<b>6</b>	<b>7</b>	<b>23</b>

<sup>a</sup> Classroom size is based on state standards of 25 students per elementary classroom and 27 students per middle and high school classrooms.

All of the recommended project design features and mitigation measures under the Proposed Project to minimize potential impacts on school services would be applicable to the Equivalency Program.

## CUMULATIVE IMPACTS

All projects contribute incrementally to increases in student populations, either through the direct construction of new housing which is then occupied by school-age children or through the creation of new employment opportunities that may induce in-migration into a school district or allow young adults to leave home and form their own households. As school districts' enrollment expands, school administrators seek both short-term and long-term remedies to accommodate these students by creating capacity at the existing schools or constructing new schools.

In recognition of these conditions, the State Legislature provided authority for school districts to assess impact fees for both residential and nonresidential development projects. Those fees, as authorized under Education Code Section 17620(a) and Government Code Section 65995(b), are collected by municipalities at the time building permits are issued and conveyed to the affected school district in accordance with a defined fee structure. Although those fees are seldom adequate to accommodate the true costs incurred by affected districts to construct new facilities, add additional teachers, and cover student costs, the Legislature has declared that the payment of those fees constitutes full mitigation for the impacts generated by new development.

Since all non-exempt projects must pay their appropriate impact fees, each project will mitigate the impacts associated with those activities. As a result, no cumulative impact upon local school districts is anticipated as a result of the implementation of the Hollywood Park.

## **PROJECT DESIGN FEATURES**

PDF K 3-1. The Proposed Project includes a 4-acre public benefit parcel that will be offered to the City or other local public agency or organization as part of the Development Agreement. While the student projections along with existing capacity do not indicate the need for a new school, the Applicant and IUSD are in the process of negotiations regarding the 4-acre site within the Project that is proposed be made available for a public use. If the Applicant and the District do not reach an agreement, the 4-acre public benefit parcel may be utilized by other public agencies.

## **MITIGATION MEASURES**

### **Construction-Related Mitigation Measures**

- MM K 3-1. Prior to the start of project demolition, the Project Applicant shall prepare a Construction Management Plan approved by the Planning Department to ensure construction impacts to nearby school sites are minimized to the maximum extent feasible. The Construction Management Plan shall include the following:
- a. Project contractors shall maintain safe and convenient pedestrian routes to IUSD schools at all times. If necessary, the Project Contractor shall provide for crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings.
  - b. The Project Contractor shall maintain ongoing communication with school administration staff at affected schools, and shall provide sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted.
  - c. Staging or parking of construction-related vehicles, including worker-transport vehicles, shall not be allowed adjacent to school sites during school operating hours.

- d. The Project Contractor shall install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive nuisances.

**Operational Mitigation Measures**

MM K 3-2. Pursuant to Government Code Section 65995, the Applicant shall pay the developer fees at the time building permits are issued; payment of the adopted fees would provide full and complete mitigation of school impacts. Alternatively, the Applicant may enter into a school finance agreement (Agreement) with the appropriate school district to address mitigation to school impacts in lieu of payment of developer fees. The Agreement shall be mutually satisfying and shall establish financing mechanisms for funding facilities to serve the students from the Project. If the Applicant and affected school district do not reach a mutually satisfying agreement, then project impacts would be subject to developer fees.

**LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Pursuant to the California Education Code, the payment of development fees or dedication of land or improvements to a school site for purposes of school facilities funding as agreed upon by the developer, land owner, and the District shall be deemed acceptable to reduce a project's impact to a less than significant level. Therefore, with respect to threshold questions (a) and (b), the Proposed Project's impact upon schools would be less than significant.

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## IV. ENVIRONMENTAL IMPACT REPORT

### K. PUBLIC SERVICES

#### 4. PARKS AND RECREATION

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##### ENVIRONMENTAL SETTING

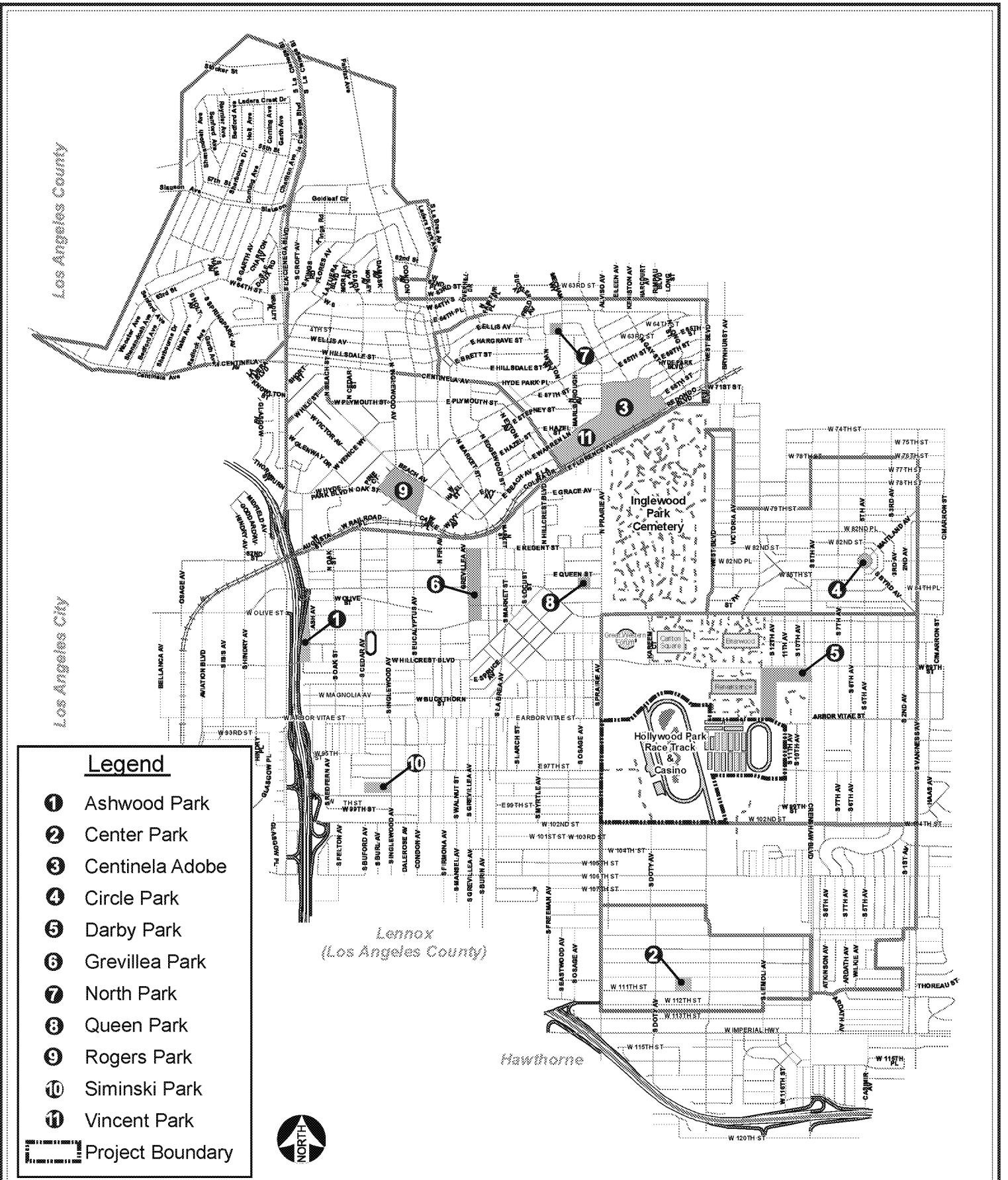
The City of Inglewood Department of Parks, Recreation and Community Services manage all municipally owned and operated recreation and park facilities within the City. In 2002 the Department was reorganized to include Community Beautification Services, which supervised property maintenance, graffiti abatement, and municipal code enforcement throughout the City. The Department of Parks, Recreation, and Community Services manages approximately 89.6 acres of parkland within 11 recreation and open spaces areas. The facilities include 16 playgrounds, 18 tennis courts, 7 basketball courts, 1 volleyball court, 12 picnic areas, 8 play fields, 8 softball fields, 7 pools, 1 skatepark (plus one planned skatepark at Rogers Park) and 8 community/cultural centers. Given that the City is approximately 9.2 square miles in size, this provides approximately 0.8 acres of parkland per 1,000 residents.

The 1995 Open Space and Parks Element, a portion of the City's General Plan, provides standards for the provision of recreational facilities throughout the City and includes local recreation standards. The standard ratio of neighborhood and community parks identified in the 1995 Element cited the 1973 Open Space and Parks Element's adopted ratio of four acres per 1,000 people. It also cited that in 1972 the City's Community Review Program recommended an ambitious standard of seven acres per 1,000 people. Due to lack of undeveloped or underutilized land in Inglewood, and due to the high cost of acquiring and clearing properties that are already developed, the 1995 Open Space and Parks Element determined that the City may never achieve the standards advocated in 1972 and 1973. Instead, the 1995 Open Space and Parks Element recommended that the City strive for a more realistic and achievable standard, and re-establish the 1970 park/population ratio minimum threshold of one acre per 1,000 residents.<sup>21</sup> The 1995 Open Space and Parks Element is the most recently adopted Element by the City, and therefore the recommended one acre per 1,000 residents is used to determine the Proposed Project's impacts on parks and recreation.

Within the City of Inglewood, 11 park and recreational facilities are located around or within its boundaries (see Figure IV.K-7 Parks and Recreation Centers). The facilities include: Ashwood Park, Center Park, Centinela Adobe, Circle Park, Darby Park, Grevillea Park, North Park, Queen Park, Rogers Park, Siminski Park, and Vincent Park (formerly Centinela Park). Lockhaven Community Center, located at 11117 Doty Avenue is approximately 13,000 sf and contains one playground and one community center, and is not identified as a park because it includes no open space. The name, addresses and size of the parks serving the Project area are provided in Table IV.K-11.

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<sup>21</sup> *City of Inglewood 1995 Open Space and Parks Element of the General Plan, pp.6- 7.*



Source: City of Inglewood General Plan Update Technical Background Report, August 2006; Figure 4.2-1.



**Table IV.K-11  
Parks and Recreational Facilities Serving the Project Site**

<b>Name</b>	<b>Address</b>	<b>Size (Acres)</b>
Ashwood Park	201 South Ash Avenue	1.3
Center Park	3660 West 11 <sup>th</sup> Street	1.2
Centinela Adobe	7634 Midfield Avenue	1.0
Circle Park	8300 Fifth Avenue	1.3
Darby Park	3400 Arbor Vitae Street	14.0
Grevillea Park	231 South Grevillea Avenue	1.5
North Park	625 East Hargrave Street	2.3
Queen Park	652 East Queen Street	1.1
Rogers Park	400 West Beach Avenue	9.0
Siminski Park	9717 South Inglewood Avenue	1.9
Vincent Park	700 East Warren Lane	55.0
<b>Total</b>		<b>89.6</b>
<i>Source: City of Inglewood Department of Parks, Recreation and Community Services: Recovery Action Program for the City of Inglewood's Park System, 2002.</i>		

According to the *Recovery Action Program for the City of Inglewood's Park System*, northern and northeastern Inglewood are adequately served by parks having recreational facilities while the southern and southwestern neighborhoods are not served adequately by comparable facilities. These areas are densely populated with mostly apartments and have the greatest need for new parks and recreational facilities and should be given priority in the planning, acquisition and development of lands to resolve these park needs. The Open Space and Parks Element of the General Plan identifies Southwest Inglewood and Lockhaven areas as being the most park deficient portions of the City.

### **Goals and Policies**

The 1995 Open Space and Parks Element of the General Plan and the Recovery Action Program for the City of Inglewood's Park System identify several goals and policies for parks and recreational areas within the City.

Within the Open Space and Parks Element, the primary goal is to provide recreational and park facilities for all residents in Inglewood. To achieve this goal, the City would seek to acquire park land, with priorities outlined in the following policies:

1. The City will strive to acquire land to provide two recreational parks in the park deficient areas of Southwest Inglewood and Lockhaven, each approximately 5 acres in size.
2. Additional land will be acquired to provide a minimum City-wide total of one acre per 1,000 residents. Upon satisfying this requirement, the City will strive to pursue any opportunity to provide additional park acreage to surpass this minimum standard.
3. Subsequent additional park acreage will be acquired and developed in areas and neighborhoods that are underserved or distant from existing parks.
4. The provision of additional park land will be balanced with the continued maintenance and improvement of existing parks and recreational facilities within the City.
5. Specific uses and design of any new park will be the responsibility of the Parks and Code Enforcement Department and the Recreation and Community Services Department. All parks will be designed to be fully accessible to persons with physical disabilities.

In 2002 the City's Department of Parks, Recreation and Community Services developed the Recovery Action Program (RAP) for the City of Inglewood's Park System, which serves as a Condition Report regarding the City's park and recreational areas. The RAP identified the Department's three main goals:

1. Repair hazards, particularly in areas used by children;
2. Increase usage through reparation of existing facilities and construction of new facilities that increase access to the parks and usage by more City residents; and
3. Improve park aesthetics through regular maintenance and repairs.

## **ENVIRONMENTAL IMPACTS**

### **Thresholds of Significance**

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project would:

- (a) Result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives of the parks department;
- (b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or
- (c) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

### **Impacts Determined to be Less Than Significant**

No impacts associated with park and recreation services were identified in the Initial Study to be less than significant.

### **Project Impacts**

The Proposed Project contains a variety of types of parks and open space areas. For security reasons, some individual areas may be gated off (for example, a tot-lot, swimming pool or homeowners club house). Certain recreation facilities, such as the private swimming pool and restroom facilities located in Bluff Park will be open to Hollywood Park residents or facility members only. Other parks and open spaces will be maintained by the various home owners associations and generally open for public use during daytime hours only. After daylight hours parks and open spaces will only be open to Hollywood Park residents. However, for security reasons, after daylight hours the parks will not be open to the general public.

Development of the Proposed Project is anticipated to result in an increase of 8,985 permanent residents. (See Section IV.H, Population, Housing and Employment). Employees of the proposed commercial/retail uses are less likely to patronize parks during working hours, and are more likely to use parks near their own homes during non-work hours. Based on the City General Plan Open Space and Parks Element Ratio, the Proposed Project would generate a need for approximately 9 acres of public parkland in the project area (e.g., 8,985 x 1/1,000). The Proposed Project would fulfill the park and recreational needs of its residents by providing 25 acres of open space on the Project Site. Based on the Proposed Project's permanent population estimates, this equates to approximately 2.8 acres per 1,000 people. This added open space would help alleviate the City's existing substandard provision of parkland and recreational facilities. As the Proposed project would provide more than enough open space to meet the parks and recreation needs of the planned development, impacts upon the public parks and recreation system would be less than significant.

### **Land Use Equivalency Program Impacts**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site.

As shown in Table IV.H-8 in Section IV.H, Population, Housing and Employment, the exchange of land uses between retail/commercial/office/hotel to residential would alter the site uses and site population, which would result in an increase in resident and daytime population (i.e., employees) generated by the Equivalency Program. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the application of the Equivalency Program may generate higher demand for park services than compared to the Proposed Project.

Development of the Maximum Scenarios under the Equivalency Program is anticipated to result in an increase of 1,515 permanent residents as compared to the Proposed Project. Employees of the proposed commercial/retail uses are less likely to patronize parks during working hours, and are more likely to use parks near their own homes during non-work hours. Based on the City General Plan Open Space and Parks Element Ratio, Equivalency Program would generate a need for approximately 11 acres of public parkland in the Project Area (e.g. 10,500 X 1/1,000). The Equivalency Program would fulfill the park and recreation needs of its residents by providing 25 acres of open space on the Project Site. Based on the Equivalency Program's permanent population estimates, this equates to approximately 2.4 acres per 1,000 people. As such, the Equivalency Program would provide more than enough open space to meet the parks and recreation needs of the planned development, and impacts upon the public parks and recreation system would be less than significant.

Therefore, the provision of park and recreation space would be provided adequately under the Equivalency Program, which has similar Project Design Features and mitigation measures.

All of the recommended project design features and mitigation measures under the Proposed Project to minimize potential impacts on school services would be applicable to the Equivalency Program.

## **CUMULATIVE IMPACTS**

The Proposed Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the City of Inglewood. Of the 39 related projects, 13 projects would generate residents and, therefore, would combine with the Proposed Project to increase demands for parkland in the City. With the implementation of the additional 25 acres of open space created by the Proposed Project, the amount of public open space and recreational facilities available throughout the City would increase to approximately 115 acres. The City's projected population in 2020 (the year anticipated for buildout of the related projects) would be approximately 120,678 people (see Section IV.H, Population, Housing and Employment). This would represent a ratio of just under one acre per 1,000 residents, thereby increasing the acres/population ratio for parks and recreational space within the City. As stated above, the Proposed Project would provide approximately 2.8 acres of open space per 1,000 permanent residents within the proposed development. Under the proposed Land Use Equivalency Program, this could decrease to 2.4 acres per 1,000 permanent residents. With the development of the Proposed Project, the City would further its goal in attaining its parks and recreational space ratio goal of 1 acre per 1,000 residents. Therefore, the Proposed Project's impact upon the park and recreation facilities serving the city would not be cumulatively considerable when analyzed in conjunction with the cumulative development citywide. Therefore, the Proposed Project's cumulative impact would be less than significant.

## **PROJECT DESIGN FEATURES**

The following PDFs are proposed to be incorporated in to the project description and were used in the basis for formulating portions of the environmental analysis with respect to parks and recreational

facilities. As such, it is recommended that the lead agency incorporate the following project design features as conditions of project approval.

PDF K 4-1. The Proposed Project shall include the construction of 25 acres of parks, open space and recreational facilities within the Specific Plan Area in accordance with the Hollywood Park Specific Plan.

## **MITIGATION MEASURES**

### **Mitigation Measures**

MM K 4-1. For those areas that are proposed for general public access, the park and open space areas shall be maintained by the home owners associations with public access during daylight hours only.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Project impacts to parks and recreational facilities would be less than significant.

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**IV. ENVIRONMENTAL IMPACT REPORT**  
**K. PUBLIC SERVICES**  
**5. LIBRARIES**

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**ENVIRONMENTAL SETTING**

The Inglewood Public Library provides library services throughout the City of Inglewood. Based on the State of California Library Statistics (2006) analyzing fiscal year 2004-2005, the Inglewood Library Department has a staff of 75 employees and operates three facilities totaling 87,160 square feet. Serving an area of approximately 8.85 square miles, the Inglewood Public Library serves a population of approximately 118,164 persons and had an annual attendance of 350,532 visitors.<sup>22</sup> A comparative summary of the operating statistics of the Inglewood Public Library relative to the statewide mean is provided in Table IV.K-12, below.

**Table IV.K-12**  
**Inglewood Public Library Department Operating Statistics**

Operating Profile	Statewide Mean	Inglewood Library Department
Expenditures Per Capita	\$27.54	\$24.56
Materials Expenditures Per Capita	\$2.80	\$3.81
Total Materials Available Per Capita	2.33	4.08
Population Served Per FTE Staff	3,103	2,493
Books Per Capita	2.15	4.01
<i>Source: State of California Library Statistics (2006) analyzing fiscal year 2004-2005, Library Development Services Bureau, Sacramento, CA, 2006.</i>		

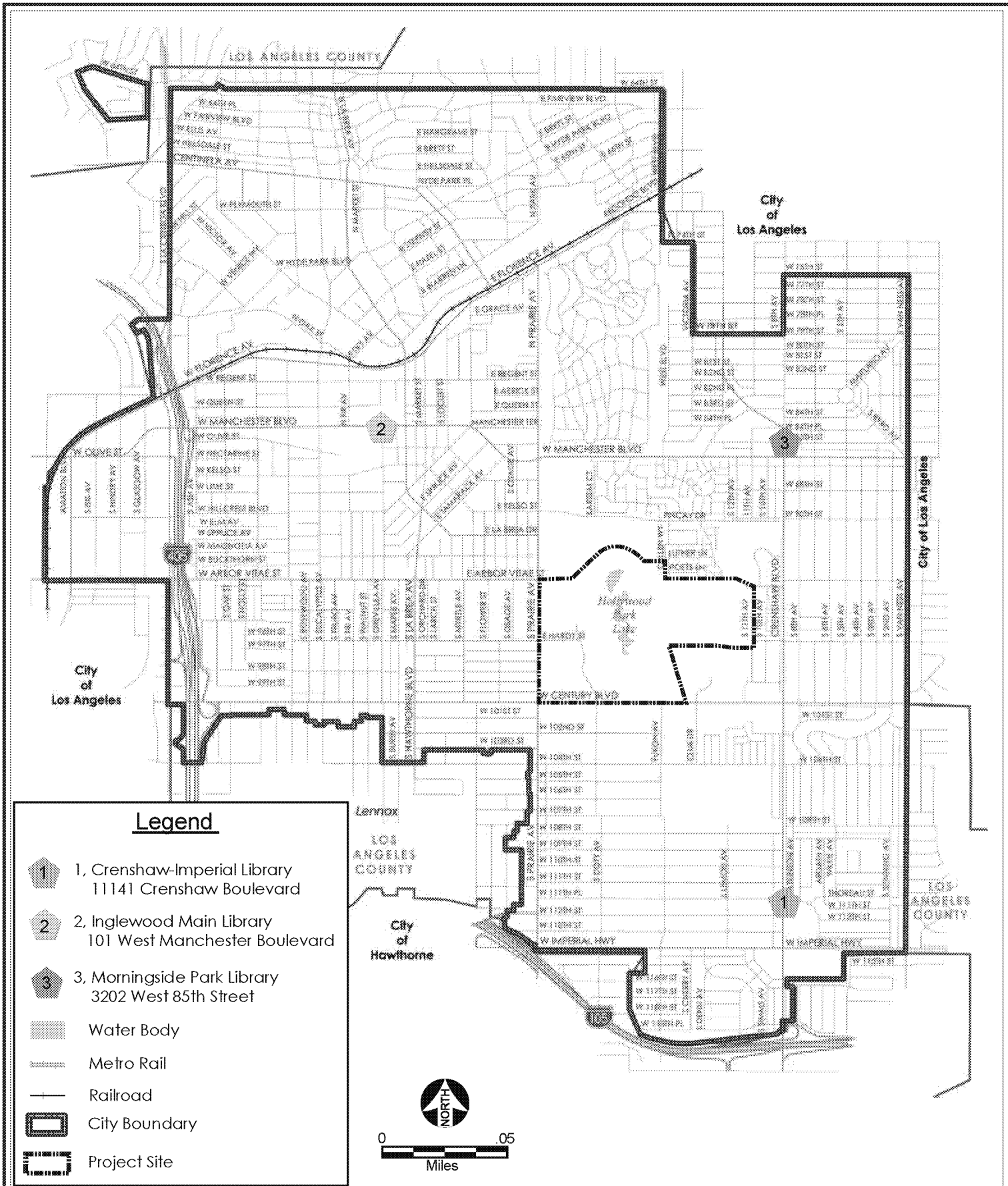
The Inglewood Public Library does not maintain a service ratio to guide the operation, maintenance, and construction of public library facilities in the City of Inglewood. Additions to the library are made on an as-needed basis with approximately three to four percent of the general fund of the City being allocated for library use. There are currently no plans for expansion of the main or branch libraries.

**Library Locations**

There are currently three libraries operating within a two-mile radius of the Project Site (See Figure IV.K-8, Library Locations for the locations of these facilities):

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<sup>22</sup> *State of California Library Statistics (2006) analyzing fiscal year 2004-2005, Library Development Services Bureau, Sacramento, CA 2006.*



Source: City of Inglewood General Plan Update Technical Background Report, August 2006; Figure 4.3-1.



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Figure IV.K-8  
Library Location Map

- (1) Main Library  
101 W. Manchester Blvd.  
Inglewood, CA 90301-1771  
(310) 412-5380
- (2) Morningside Park  
3202 W. 85th St.  
Inglewood, CA 90305-1910  
(310) 412-5400
- (3) Crenshaw-Imperial  
11141 Crenshaw Blvd.  
Inglewood, CA 90303-2338  
(310) 412-5403

The Main Library is approximately 2.3 miles northwest of the Project Site, the Morningside Branch Library is located approximately 1.0 mile northwest of the Project Site, and the Crenshaw-Imperial Branch Library is located approximately 1.0 mile south of the Project Site. As the closest of the libraries to the Project Site, the Morningside Library would likely be the primary library serving the Proposed Project.

The Morningside Park Branch Library, which is 2,260 square feet in size, is a relatively small neighborhood branch that is open five days a week for a total of 36 hours. The Crenshaw-Imperial Branch Library, which is 7,600 square feet in size, is also open 36 hours over five days. The Main Library, which is 77,300 square feet in size, is open seven days a week for a total of 60 hours. The Main Library serves the entire City, whose 2008 population is now estimated by the California Department of Finance at 118,878. Within this area, the primary service area of the Morningside Park Branch Library is estimated at 20,348 and the Crenshaw-Imperial Branch Library at 30,493. Full time equivalent (FTE) staffing is 38.89 at the Main Library, 3 at Morningside Park Branch Library, and 3.48 at Crenshaw-Imperial Branch Library. The Library makes extensive use of part-time personnel, so the number of employees is far higher than the FTE total.

There are no plans for new libraries or expansion of current libraries in the City of Inglewood.<sup>23</sup> The Crenshaw-Imperial Branch Library reopened in February 2007 after a complete renovation of the forty year old building. The IPL plans to renovate the Morningside Park Branch Library, while proposals to completely renovate the existing Main Library have not received funding. If the IPL cannot secure funds for a complete project, they are planning a number of significant renovations and upgrades to the building.

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<sup>23</sup> E-mail correspondence from Michael Easley, Senior Administrative Analyst, Inglewood Public Library, to Brett Pomeroy, Environmental Planner, Christopher A. Joseph & Associates, July 11, 2007.



Additionally, there are several branch and community libraries near the Project Site that residents of the Proposed Project could potentially access. The Lennox Library, located at 4359 Lennox Boulevard in Lennox, is approximately 1.4 miles south of the Project Site, and currently has a collection of 53,700 volumes. The Hawthorne Library located in Hawthorne, the Culver City Julian Dixon Library located in Culver City, Baldwin Hills Branch Library and Westchester Branch Library, located in Los Angeles, are all within 6 miles of the Project Site.

## **ENVIRONMENTAL IMPACT**

### **Methodology**

The following impact analysis is based upon a written correspondence from Michael Easley, Senior Administrative Analyst of the Inglewood Public Library, dated July 11, 2007, in response to an informational request submitted by the environmental consultant. The determination of a significant impact upon library services is based upon the IPD's current staffing levels, facilities, and resources, and the IPL's assessment of meeting the future library demands generated by the project.

### **Threshold of Significance**

In accordance with Appendix G of the State CEQA Guidelines, a significant impact would occur if a project were to:

- (a) Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services.

### **Impacts Determined to be Less Than Significant**

No impacts associated with library services were identified in the Initial Study to be less than significant.

### **Project Impacts**

Development of the Proposed Project would result in the development of approximately 2,995 dwelling units resulting in a permanent residential population increase of approximately 8,985 persons (see Section IV.H, Population, Housing and Employment). This population increase has the potential to increase demands on library services in the area. The nearest library to the Project Site is the Morningside Branch library. The Proposed Project would also be served by the Main library and Imperial-Crenshaw Libraries. As discussed above, the Inglewood Public Library does not maintain a service ratio to guide the operation, maintenance, and construction of public library facilities in the City of Inglewood. Additions to the library are made on an as-needed basis with approximately three to four percent of the general fund

of the City being allocated for library use. The City does not impose developer mitigation fees or other assessments specifically earmarked for the Library.<sup>24</sup>

Based on written correspondence from the IPL, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels.<sup>25</sup> With additional funds, IPL would provide more hours of service at the three locations, more books and other materials, and a greater number of public-use computers. The IPL believes that their current facilities can provide the same level of service to the additional population in the proposed project area, except that the demand for public-use computers will increase. The IPL will seek funding to add additional workstations. Development of the Project Site would result in additional tax revenue in the City of Inglewood that could be used to expand the existing computer workstations at the Inglewood Public Library. In addition, the Proposed Project includes a 4-acre site to be dedicated for civic uses. While the exact use of this civic-oriented use site has yet to be determined, the City could develop the site with a library, joint use school/library, or other public use to offset the increased demands upon the library services. Through the allocation of the civic center site and contribution to the City's tax revenue, the Proposed Project's impact upon library services would be assessed as appropriate, commensurate with the demands placed on the public library system. The Proposed Project's impact upon library services would therefore be considered less than significant.

### **Land Use Equivalency Program Impacts**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. As shown in Table IV.H-8 in Section IV.H, Population, Housing and Employment, the exchange of land uses between retail/commercial/office/hotel to residential would alter the site uses and site population, which would result in an increase in resident and daytime population (i.e., employees) generated by the Equivalency Program. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the development of the Equivalency Program is anticipated to result in an increase of 1,515 permanent residents. Employees of the proposed commercial/retail uses are less likely to patronize libraries during working hours, and are more likely to use libraries near their own homes during non-work hours.

Based on written correspondence from IPL, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels. With additional funds, IPL would provide more hours of service at the three locations, more books and other materials, and a greater number of public-use computers. Development of the Equivalency Program would result in additional tax revenue in the City that could be used to expand the existing library facilities. As with the case of the Proposed Project, the

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<sup>24</sup> E-mail correspondence from Michael Easley, Senior Administrative Analyst, Inglewood Public Library, to Brett Pomeroy, Environmental Planner, Christopher A. Joseph & Associates, July 11, 2007.

<sup>25</sup> *Ibid.*

demand for library services under the Equivalency Program could be met by existing service, therefore, the impacts to library services would be less than significant.

## **CUMULATIVE IMPACTS**

Development of the Proposed Project in conjunction with the 39 related projects listed in Section III (Related Projects) would result in an increase in employees and permanent residents in the project area. Employees generated by the commercial related projects would not typically enjoy long periods of time during the workday to visit the library facilities. However, the increase in the residential population by the related projects in the vicinity of the Proposed Project would increase demand at library facilities serving the Inglewood community. As noted in Section IV.H, Population, Housing, and Employment of this Draft EIR, the related projects in combination with the Proposed Project with the proposed Land Use Equivalency Program, would be expected to add an additional 12,480 to 13,995 persons to the City by 2020. As with the Proposed Project, each of the related projects would contribute to the City's tax base, of which approximately three to four percent of the general fund of the City is allocated for library use.

Furthermore, as the related projects are scattered in a radius of approximately 2 miles of the Project Site, they may also be served by other nearby libraries including the Lennox Library (4359 Lennox Blvd, Lennox), Hawthorne Library (12700 Grevillea Avenue, Hawthorne), the Culver City Julian Dixon Library (4975 Overland Avenue, Culver City), Baldwin Hills Branch Library (2906 S. La Brea, Los Angeles) and Westchester Branch Library (7114 W. Manchester Avenue, Los Angeles). Together, these resources would be sufficient to serve the related projects in combination with the Proposed Project and there would be a less than significant impact.

## **PROJECT DESIGN FEATURES**

No specific PDFs have been proposed that are directly related to library services. However, the Proposed Project includes a 4-acre public benefit parcel that will be offered to the City or other local public agency or organization as part of the Development Agreement. While the impacts of this parcel have been analyzed under the assumption that may be developed as an elementary school or a library, depending upon the impact being analyzed, a final determination on the future use of the parcel will be made by the City Council. In addition, if it is utilized as a school, there would be a possibility of a joint library use.

## **MITIGATION MEASURES**

No mitigation measures are required.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

With respect to threshold (a) above, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, nor would it generate the need for new or physically altered library facilities in order to maintain acceptable service ratios or other performance objectives for library services. Project impacts to library services would be less than significant.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### L. TRAFFIC/TRANSPORTATION

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The following analysis summarizes the findings and conclusions of the Revised Traffic Impact Study for the Hollywood Park Redevelopment Project (the “Traffic Study,” “Traffic Impact Study,” or “TIS”), prepared by Linscott, Law & Greenspan Engineers, August 1, 2008. The Revised Traffic Impact Study is included in its entirety as Appendix G-1 to this EIR.

The traffic analysis follows City of Inglewood traffic study guidelines and is consistent with traffic impact assessment guidelines set forth in the 2004 Congestion Management Program for Los Angeles County. The traffic analysis evaluates the project-related impacts associated with the proposed development at 66 key intersections in the vicinity of the Project Site. The study intersections were determined in consultation with the City of Inglewood Department of Public Works staff. The Intersection Capacity Utilization method was used to determine Volume-to-Capacity ratios and corresponding Levels of Service at the study intersections. Additionally, a review was conducted of the Los Angeles County Metropolitan Transportation Authority intersection and freeway monitoring stations to determine if a Congestion Management Program transportation impact assessment analysis is required for the proposed project.

The Traffic Impact Study (i) presents existing traffic volumes, (ii) forecasts future traffic volumes with and without the proposed project, (iii) determines project-related impacts, (iv) forecasts future cumulative traffic volumes, and (v) presents recommendations for mitigation where necessary.

#### **Existing Project Site**

The Proposed Project is located within the Manchester-Prairie and Century Redevelopment Constituent Project Areas of the Merged Redevelopment Project Area of the City of Inglewood. The Project Site is generally bounded by vacant commercial property and existing residential development on the north, Century Boulevard on the south, existing residential development and a commercial shopping center on the east, and Prairie Avenue on the west (see Figure II-1, Regional and Vicinity Map in Section II, Project Description).

#### **Existing Site Access**

Primary vehicular access to the existing Hollywood Park Racetrack and Casino is presently provided via the following gates/driveways:

- Gate 2 on Prairie Avenue (opposite Arbor Vitae Street)
- Gate 3 on Prairie Avenue (opposite Hardy Street)
- Gate 4 on Century Boulevard (opposite Doty Avenue)
- Gate 5 on Century Boulevard (opposite Yukon Avenue)

- Gate 7/7A on Pincay Drive (opposite Carlton Square)

It should be noted that all five gates/driveways are presently controlled by traffic signals. Gates 2, 3, and 4 provide access for the general public to both the racetrack and the casino while Gate 7/7A is limited to employee and delivery vehicles only. Gate 5 is typically not utilized and is currently gated. All of the existing project gates/driveways currently accommodate full access (i.e., left-turn and right-turn ingress and egress turning movements). Other driveways are also provided along Prairie Avenue, Century Boulevard, and Pincay Drive but these driveways are only utilized on an as-needed basis.

## **Existing Street System**

### ***Regional Highway System***

Regional access to the Project Site is provided by the San Diego Freeway (I-405) and the Century Freeway (I-105). A brief description of I-405 and I-105 Freeways are provided in the following paragraphs.

I-405 (San Diego) Freeway is a major north-south oriented freeway that extends from the San Fernando area to the north and the San Diego area to the south. In the project vicinity, the I-405 Freeway contains five mainline freeway lanes (four mixed flow lanes and one carpool lane) in each direction. Northbound and southbound ramps are provided on I-405 Freeway at Manchester Boulevard and at Century Boulevard, which are located approximately one and one-half miles west of the Project Site.

I-105 (Century) Freeway is a major east-west oriented freeway that extends from the Norwalk area to the east and the El Segundo / Los Angeles International Airport areas to the west. In the project vicinity, the I-105 Freeway contains five mainline freeway lanes (four mixed flow lanes and one carpool lane) in each direction. Eastbound and westbound ramps are provided on I-105 Freeway at Prairie Avenue and at Crenshaw Boulevard, which are located approximately one and one-half miles south of the Project Site.

### ***Local Street System***

Immediate access to the Project Site is provided via Prairie Avenue, Century Boulevard, and Pincay Drive. In consultation with the City of Inglewood Department of Public Works staff, the following 66 intersections were selected for analysis to evaluate the potential impacts generated by the proposed project (the City in which each study intersection is located is identified in parentheses):

1. Sepulveda Boulevard/Slauson Avenue (City of Culver City)
2. Sepulveda Boulevard/Centinela Avenue (City of Los Angeles)
3. La Cienega Boulevard Southbound (SB)/Slauson Avenue (County of Los Angeles)
4. La Cienega Boulevard Northbound (NB)/Slauson Avenue (County of Los Angeles)
5. La Tijera Boulevard/Centinela Avenue (City of Los Angeles)

6. La Cienega Boulevard/La Tijera Boulevard (City of Los Angeles)
7. La Cienega Boulevard/Centinela Avenue (City of Los Angeles)
8. La Cienega Boulevard/Manchester Boulevard (City of Inglewood)
9. I-405 Freeway NB Ramps/Manchester Boulevard (City of Inglewood)
10. La Cienega Boulevard/Arbor Vitae Street (City of Inglewood)
11. La Cienega Boulevard/I-405 Freeway SB Ramps, north of Century Boulevard (City of Los Angeles)
12. La Cienega Boulevard/Century Boulevard (City of Los Angeles)
13. La Cienega Boulevard/I-405 Freeway SB Ramps, south of Century Boulevard (City of Los Angeles)
14. I-405 Freeway NB Ramps/Century Boulevard (City of Inglewood)
15. Inglewood Avenue/Arbor Vitae Street (City of Inglewood)
16. Inglewood Avenue/Century Boulevard (City of Inglewood)
17. La Brea Avenue/Slauson Avenue (County of Los Angeles)
18. La Brea Avenue/Centinela Avenue (City of Inglewood)
19. La Brea Avenue/Florence Avenue (City of Inglewood)
20. La Brea Avenue/Manchester Boulevard (City of Inglewood)
21. La Brea Avenue/Arbor Vitae Street (City of Inglewood)
22. La Brea Avenue/Century Boulevard (City of Inglewood)
23. Hawthorne Boulevard/Imperial Highway (City of Hawthorne)
24. Centinela Avenue/Florence Avenue (City of Inglewood)
25. Prairie Avenue/Florence Avenue (City of Inglewood)
26. Prairie Avenue/Manchester Boulevard (City of Inglewood)
27. Prairie Avenue/Kelso Street-Pincay Drive (City of Inglewood)
28. Prairie Avenue/Arbor Vitae Street-Gate 2 (City of Inglewood)
29. Prairie Avenue/Hardy Street-Gate 3 (City of Inglewood)

30. Prairie Avenue/Century Boulevard (City of Inglewood)
31. Prairie Avenue/I-105 Freeway Eastbound (EB)-Westbound (WB) Off Ramps-112<sup>th</sup> Street (City of Inglewood)
32. I-105 Freeway EB On-Ramp-Freeman Avenue/Imperial Highway (City of Hawthorne)
33. Prairie Avenue/Imperial Highway (City of Hawthorne)
34. Cemetery Driveway-Kareem Court/Manchester Boulevard (City of Inglewood)
35. Crenshaw Drive-Briarwood Lane/Manchester Boulevard (City of Inglewood)
36. Kareem Court-Gate 8/Pincay Drive (City of Inglewood)
37. Carlton Drive-Gate 7-7A/Pincay Drive (City of Inglewood)
38. Gate 4-Doty Avenue/Century Boulevard (City of Inglewood)
39. Gate 5-Yukon Avenue/Century Boulevard (City of Inglewood)
40. Club Drive/Century Boulevard (City of Inglewood)
41. Crenshaw Boulevard/Slauson Avenue (City of Los Angeles)
42. Crenshaw Boulevard/Florence Avenue (City of Los Angeles)
43. Crenshaw Boulevard/Crenshaw Drive-82<sup>nd</sup> Street (City of Inglewood)
44. Crenshaw Boulevard/8<sup>th</sup> Avenue (City of Inglewood)
45. Crenshaw Boulevard/Manchester Boulevard (City of Inglewood)
46. Crenshaw Boulevard/Pincay Drive-90<sup>th</sup> Street (City of Inglewood)
47. Crenshaw Boulevard/Century Boulevard (City of Inglewood)
48. Crenshaw Boulevard/Imperial Highway (City of Inglewood)
49. Crenshaw Boulevard/Shopping Center Driveway, south of Imperial Highway (City of Inglewood)
50. Crenshaw Boulevard/116<sup>th</sup> Street (City of Inglewood)
51. Crenshaw Boulevard/118<sup>th</sup> Place-I-105 Freeway WB Ramps (City of Inglewood)
52. I-105 Freeway EB Ramps/120<sup>th</sup> Street (City of Hawthorne)
53. Crenshaw Boulevard/120<sup>th</sup> Street (City of Hawthorne)

54. Western Avenue/Manchester Avenue (City of Los Angeles)
55. Western Avenue/Century Boulevard (City of Los Angeles)
56. Vermont Avenue/Manchester Avenue (City of Los Angeles)
57. Vermont Avenue/Century Boulevard (City of Los Angeles)
58. Figueroa Street/Manchester Avenue (City of Los Angeles)
59. I-110 Freeway SB Ramps/Manchester Avenue (City of Los Angeles)
60. I-110 Freeway NB Ramps/Manchester Avenue (City of Los Angeles)
61. Figueroa Street/Century Boulevard (City of Los Angeles)
62. I-110 Freeway SB Off-Ramp-Grand Avenue/Century Boulevard (City of Los Angeles)
63. I-110 Freeway NB On-Ramp-Olive Street/Century Boulevard (City of Los Angeles)
64. Crenshaw Boulevard/104<sup>th</sup> Street (City of Inglewood)
65. Proposed Signalized Driveway/Century Boulevard (City of Inglewood)
66. Prairie Avenue/97<sup>th</sup> Street (City of Inglewood)

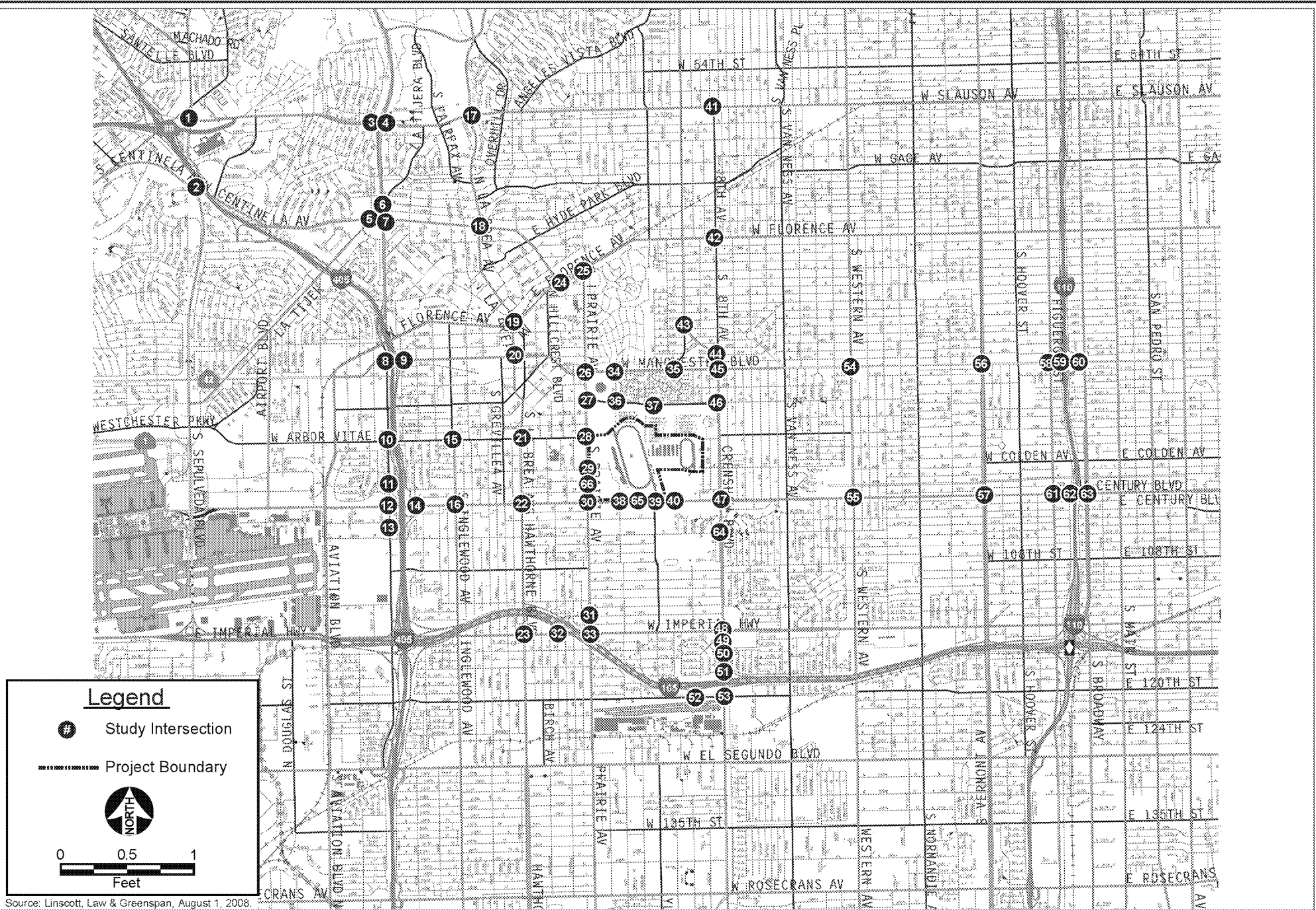
The location of each intersection is depicted in Figure IV.L-1. All of the existing study intersections selected for analysis are currently controlled by traffic signals with the exception of the Crenshaw Boulevard & Shopping Center Driveway intersection (just south of Imperial Highway) and the Prairie Avenue & 97<sup>th</sup> Street intersection. The existing lane configurations at the 66 study intersections are displayed in Figure IV.L-2.

### ***Roadway Classifications***

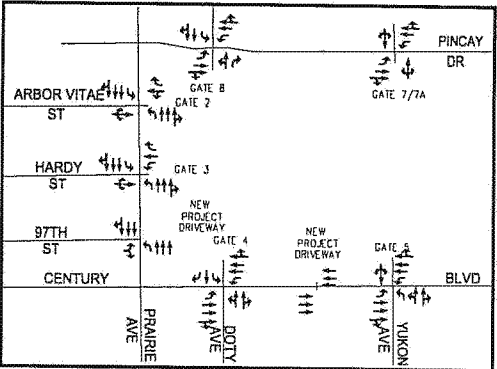
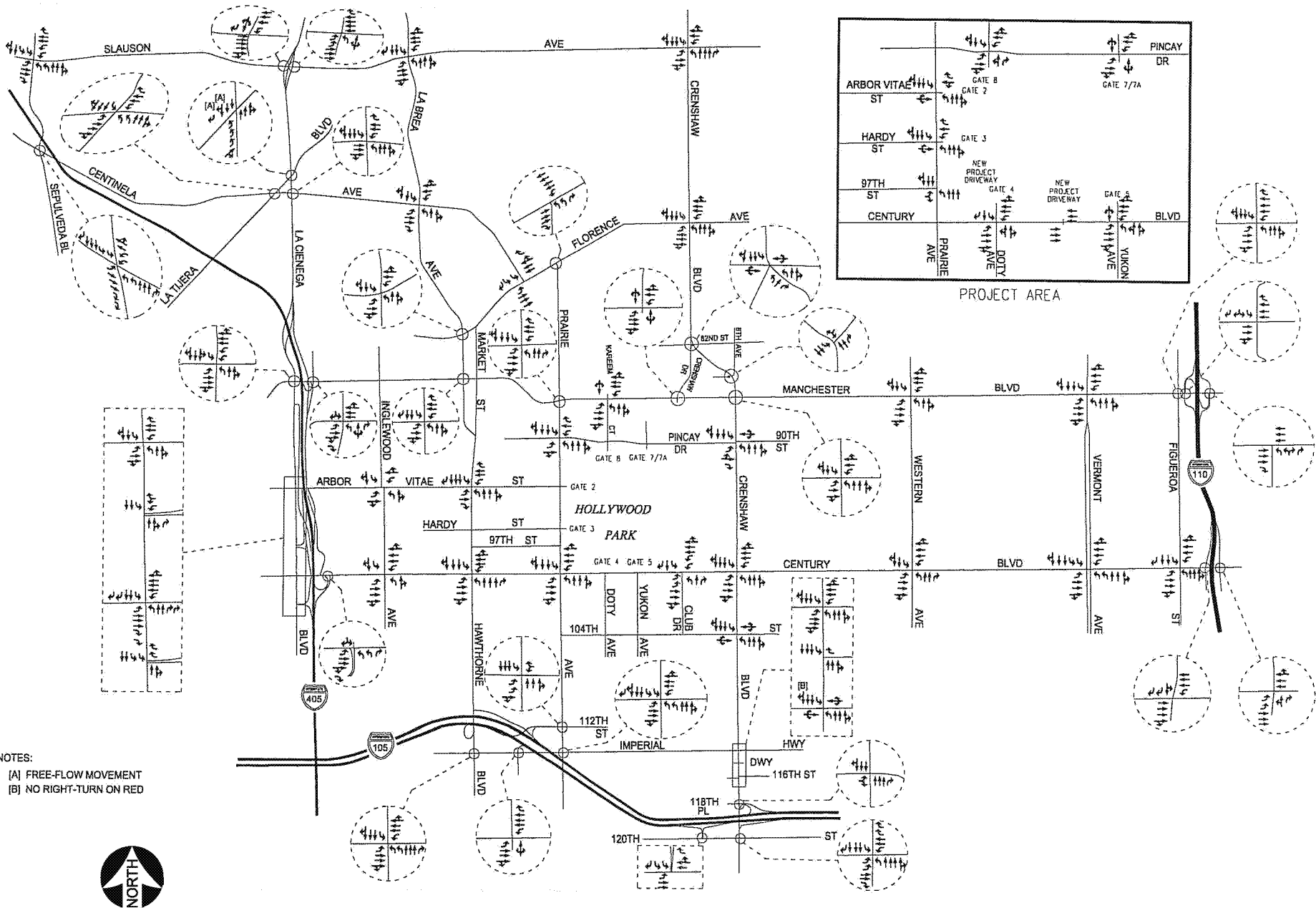
The City of Inglewood utilizes the roadway categories recognized by regional, state and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

- Freeways are limited-access and high speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses.





Source: Linscott, Law & Greenspan, August 1, 2008.



- NOTES:  
 (A) FREE-FLOW MOVEMENT  
 (B) NO RIGHT-TURN ON RED



Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-2  
 Existing Lane Configurations

- Arterial roadways are major streets that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. Principal arterials are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials are typically two-to-four lane streets that service local and commuter traffic.
- Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. They connect local streets to arterials and are typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking. They may also provide access to abutting properties.
- Local roadways distribute traffic within a neighborhood or similar adjacent neighborhoods and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are fronted by residential uses and do not typically serve commercial uses.

### *Roadway Descriptions*

A review of the important roadways in the Project Site vicinity and study area is provided in the Traffic Impact Study. As indicated in Traffic Impact Study, the important roadways within the project study area were reviewed on a segment basis in terms of the number of lanes provided, parking restrictions, posted speed limits, etc. Additionally, the roadway classifications as designated by the appropriate jurisdiction are noted on a segment basis.

### *Public Transit Services*

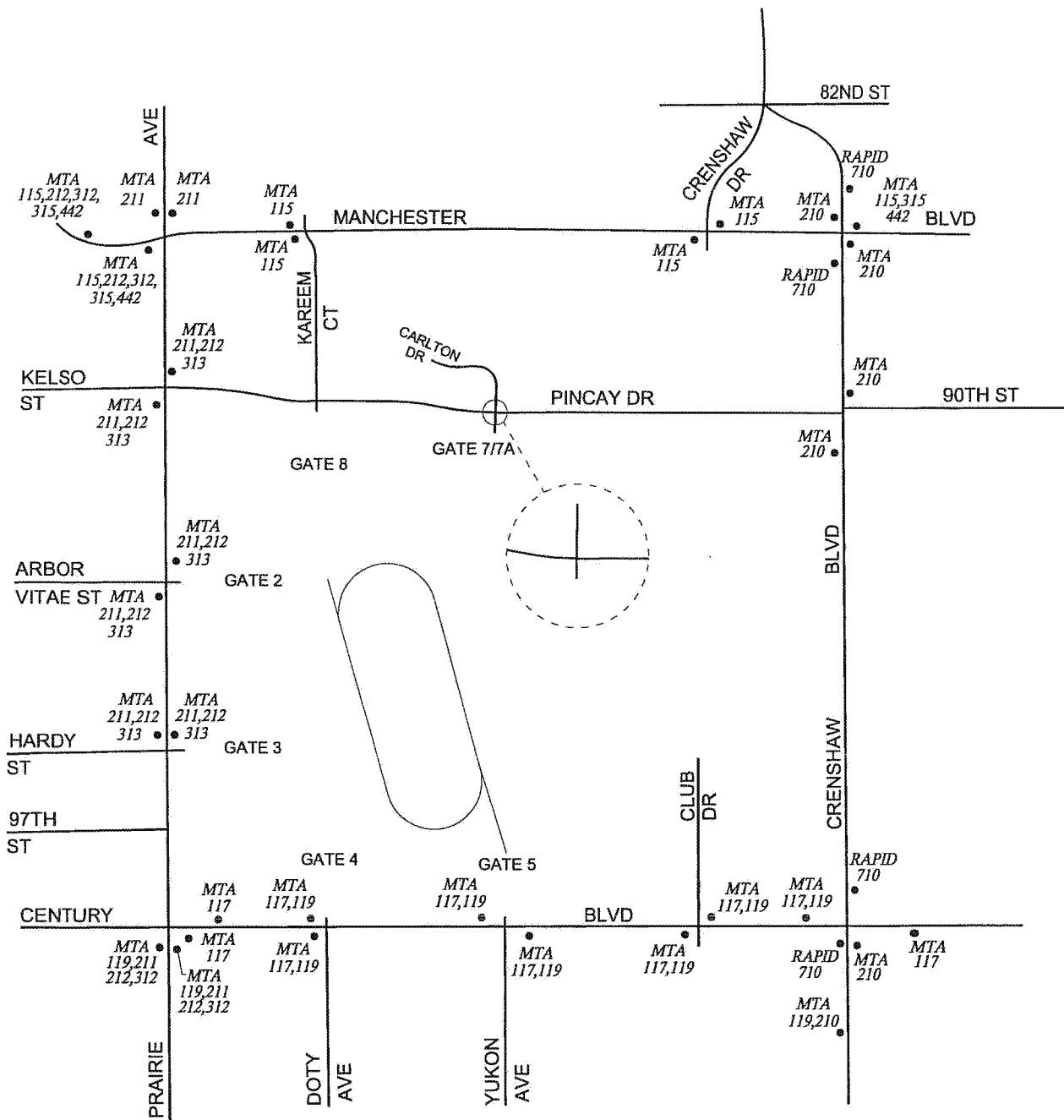
Public transit services in the project study area are currently provided by the Los Angeles County Metropolitan Transportation Authority (MTA). A summary of the existing transit routes, including the transit route, destinations and peak hour headways is presented in Table IV.L-1. The existing public transit routes in the proposed Project Site vicinity are illustrated in Figure IV.L-3. It should be noted that although public transit information is provided in this study, no reduction has been taken in the determination of the proposed project's vehicular trip generation forecasts and the corresponding traffic impacts to the surrounding street system to account for project-related trips that may be made via public transit in lieu of a private automobile.

### *Existing Bus Transit*

The MTA provides bus transit service along major roadways within the project vicinity: Century Boulevard, Prairie Avenue, Manchester Boulevard, and Crenshaw Boulevard. The MTA operates ten transit routes along these four major roadways surrounding the Project Site. Most of the MTA bus transit routes provide headways of two to six buses per hour in each direction during the weekday morning and afternoon peak commuter hours and during the Saturday mid-day peak hour.

**Table IV.L-1  
Existing Transit Routes**

Route	Destinations	Roadway Near Site	No. of Buses/Trains during Peak Hour			
			DIR	AM	PM	SAT
Metro Route 115	Pacific Avenue/Culver Boulevard to Norwalk Station	Prairie Avenue; Manchester Boulevard; Kareem Court; Crenshaw Drive; Crenshaw Boulevard	EB	8	5	4
			WB	11	6	4
Metro Route 117	City Bus Center to Lakewood Station	Century Boulevard; Prairie Avenue; Doty Avenue; Yukon Avenue; Club Drive; Crenshaw Boulevard	EB	3	4	5
			WB	4	3	4
Metro Route 119	Hawthorne/I-105 Station to 103rd Street/Kenneth Hahn Station	Century Boulevard; Prairie Avenue; Doty Avenue; Yukon Avenue; Club Drive; Crenshaw Boulevard	EB	1	1	N/A
			WB	1	1	N/A
Metro Route 210	South Bay Galleria to Hollywood/Vine Station	Crenshaw Boulevard; Manchester Boulevard; 90th Street; Pincay Drive; Century Boulevard	NB	6	4	4
			SB	5	5	3
Metro Route 211	South Bay Galleria to Market Street/ Manchester Boulevard	Manchester Boulevard; Prairie Avenue; Kelso Street; Arbor Vitae Street; Hardy Street; Century Boulevard	NB	2	2	N/A
			SB	4	2	N/A
Metro Route 212	Hawthorne/I-105 Station to Hollywood/Vine Station	Manchester Boulevard; Prairie Avenue; Kelso Street; Arbor Vitae Street; Hardy Street; Century Boulevard	NB	2	5	4
			SB	3	N/A	4
Metro Route 312	Hawthorne/I-105 Station to Hollywood/Vine Station	Manchester Boulevard; Prairie Avenue; Century Boulevard	NB	6	N/A	N/A
			SB	N/A	5	N/A
Metro Route 315	Pacific Avenue/Culver Boulevard to Norwalk Station	Prairie Avenue; Manchester Boulevard; Crenshaw Boulevard	EB	3	5	N/A
			WB	5	4	N/A
Metro Route 442	Hawthorne/I-105 Station to Patsaouras Transit Plaza	Manchester Boulevard; Crenshaw Boulevard; Century Boulevard	NB	2	N/A	N/A
			SB	N/A	2	N/A
Rapid Route 710	South Bay Galleria to Hollywood/Vine Station	Manchester Boulevard; Crenshaw Boulevard; Century Boulevard	NB	6	6	4
			SB	6	6	4
Metro Green Line	Redondo Beach to Norwalk	Crenshaw Boulevard; Hawthorne Boulevard	EB	8	8	4
			WB	8	8	4



Metro Green Line  
Hawthorne Station

Metro Green Line  
Crenshaw Station



Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-3  
Existing Transit Lines

The existing average weekday transit bus ridership data for the available transit lines provided by the MTA is presented in detail in the Traffic Impact Study. For each transit line shown, the bus stop located nearest to the Project Site where ridership data is available in each direction was identified. In addition, the average load representing the average number of persons on each bus during the weekday AM and PM peak hours is summarized. The average bus load during the weekday AM peak hour ranges from two persons per bus (Route 119) to 25 persons per bus (Route 117). The average bus load during the weekday PM peak hour ranges from three persons per bus (Route 211) to 24 persons per bus (Route 117). Based on this review, capacity to accommodate potential transit ridership generated to and from the proposed project is available.

#### *Existing Metro Green Line*

The Metro Rail system is comprised of the Metro Blue, Green, Red, Purple, and Gold Lines. The project study area is currently served by the Metro Green Line, which crosses the Metro Blue Line and runs in an east-west direction between Norwalk and Redondo Beach, curving south near the Los Angeles International Airport. The two closest Metro Green Line Stations to the Project Site include the Hawthorne Station which is located approximately one mile to the southwest and the Crenshaw Station which is located approximately one and a half mile to the southeast. The Metro Green Line currently provides headway of eight trains per hour in each direction during the weekday morning and afternoon peak commuter hours and four trains per hour in each direction during the Saturday mid-day peak hour.

#### *Potential Future Rail Services*

Based on information provided by the City of Inglewood, the MTA had acquired the right-of-way along the BNSF railroad tracks adjacent to Florence Avenue, which may potentially be developed in the future into some form of rail services. However, the timing and scope of such rail services can not be determined at this time and therefore are not included in this traffic analysis.

#### **Traffic Counts**

Manual traffic counts of vehicular turning movements were conducted at each of the 66 study intersections during the weekday morning (AM) and afternoon (PM) commuter periods as well as the Saturday mid-day period to determine the peak hour traffic volumes. The manual traffic counts were conducted by two traffic count subconsultants (i.e., City Traffic Counters and The Traffic Solution) at the study intersections from 7:00 to 9:00 AM to determine the weekday AM peak commuter hour, from 4:00 to 6:00 PM to determine the weekday PM peak commuter hour, and from 11:00 AM to 2:00 PM on Saturday to determine the Saturday mid-day peak hour. The traffic counts were conducted during weekdays when local schools were in session. Traffic volumes at the study intersections show the typical peak periods between 7:00 to 9:00 AM and 4:00 to 6:00 PM generally associated with weekday peak commuter hours in the metropolitan Los Angeles area.

The weekday AM, weekday PM, and Saturday mid-day peak period manual counts of vehicle movements at the 66 study intersections are summarized in detail in the Traffic Impact Study. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are shown in Figures

IV.L-4 and IV.L-5, respectively. The existing traffic volumes at the study intersections during the Saturday mid-day peak hour are shown in Figure IV.L-6. Summary data worksheets of the manual turning movement traffic counts are contained in the Traffic Impact Study.

### **Project Trip Generation**

Traffic volumes expected to be generated by the proposed project during the weekday AM and PM peak hours and Saturday mid-day peak hour, as well as on a daily basis for a weekday and a Saturday, were estimated using rates published in the Institute of Transportation Engineers' (ITE) Trip Generation manual, 7th Edition, 2003. Trip generation forecasts for the individual project land use components and existing uses to be removed are summarized in the following paragraphs. As previously noted, although public transit information is provided in this study, no reduction has been taken in the determination of the proposed project's vehicular trip generation forecasts and the corresponding traffic impacts to the surrounding street system.

#### *Shopping Center Component*

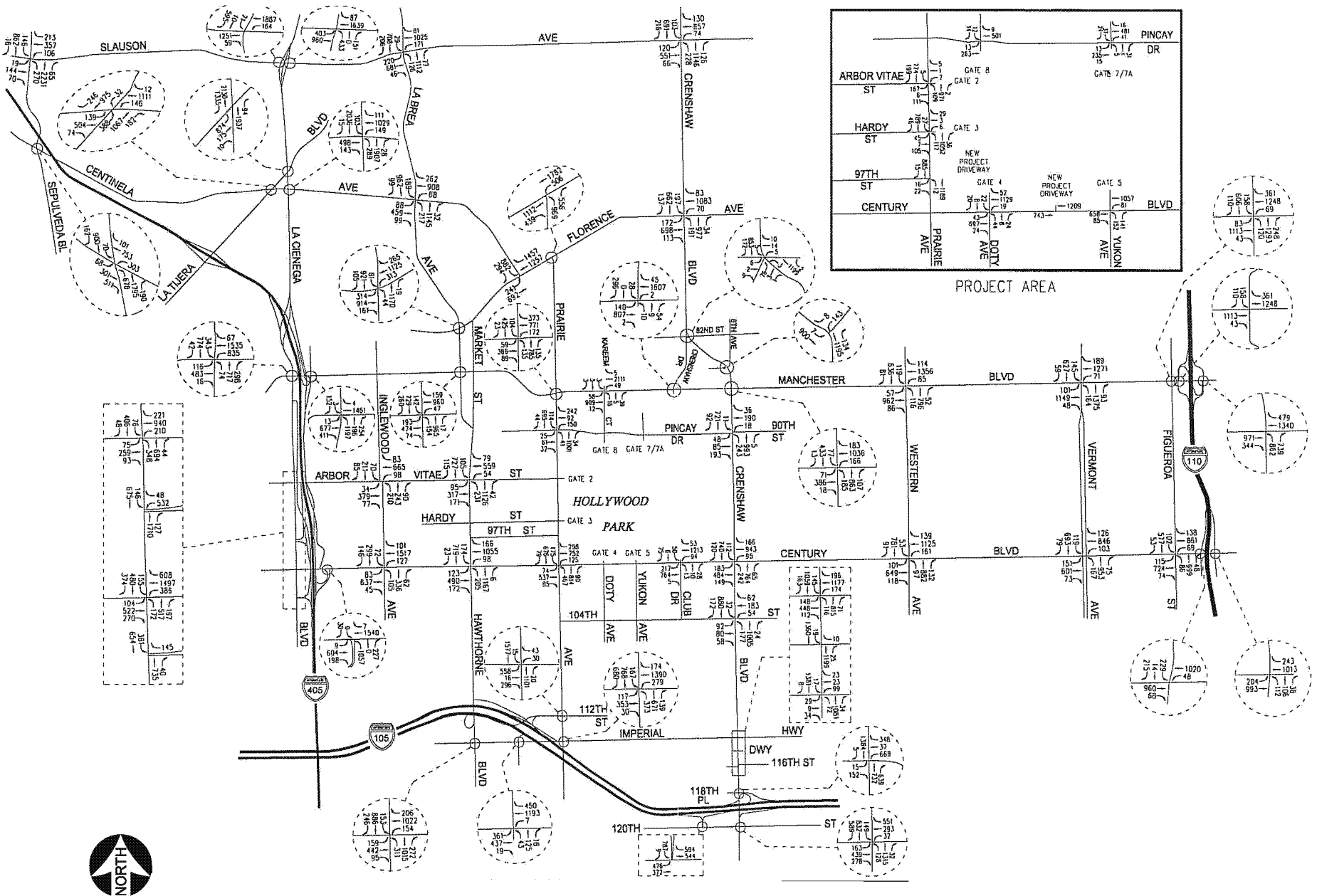
Traffic volumes expected to be generated by the shopping center (i.e., retail) component were forecast based upon rates per thousand square feet of development. ITE Land Use Code 820 (Shopping Center) trip generation equation rates were used to forecast the traffic volumes expected to be generated by the retail use.

#### *Casino/Off-Track Betting Component*

Traffic volumes expected to be generated by the casino/off-track betting component were based on traffic count data collected at the existing Hollywood Park Casino. Weekday and weekend traffic counts were conducted at the project driveways on days without live horse racing events at the Hollywood Park in order to isolate the trip generation associated with the existing casino and simulcast operation. Summary data worksheets of the manual turning movement traffic counts at the project driveways (i.e., without live horse racing events) are contained in detail in the Traffic Impact Study (see Appendix G-1). As off-track betting is currently available at Hollywood Park and will continue to be available in the future, the traffic count data collected at the project driveways provide a valid estimate of trip generation associated with the casino/off-track betting component.

#### *Residential Component*

Traffic volumes expected to be generated by the residential component were forecast based upon rates per number of dwelling units. ITE Land Use Code 230 (Residential Condominium/Townhouse) trip generation equation rates were used to derive average rates to forecast the traffic volumes expected to be generated by the residential component. The regression equations contained in the ITE manual represent a best fit of actual traffic counts conducted at existing residential sites. However, most of the trip generation surveys contained in the ITE manual for this land use during the weekday conditions were conducted for existing developments with 600 dwelling units or less. Given the size of the proposed residential component (2,995 units proposed), it is therefore more appropriate and conservative to derive



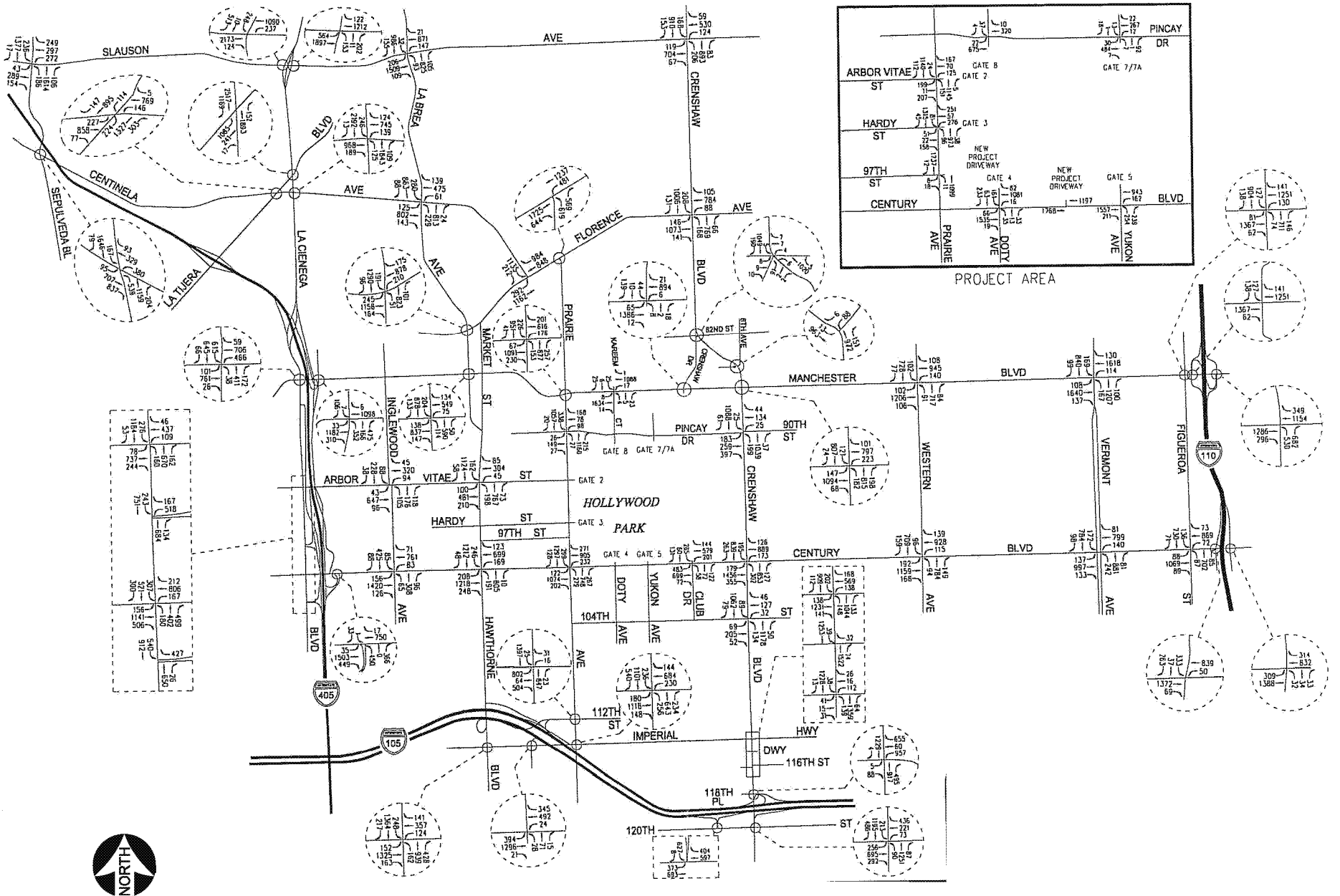
Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-4  
Existing Traffic Volumes  
Weekday AM Peak Hour



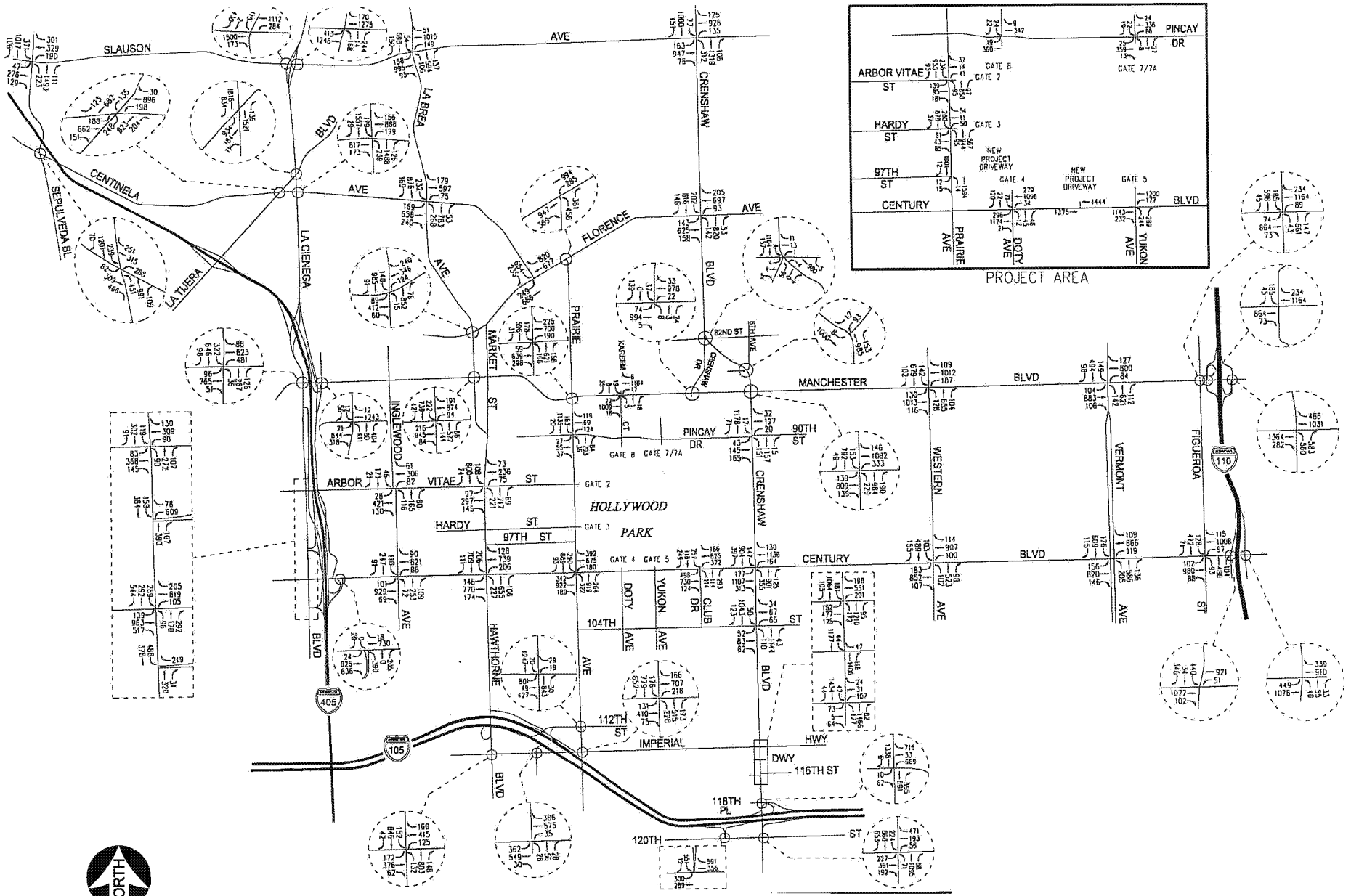


Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-5  
Existing Traffic Volumes  
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-6  
Existing Traffic Volumes  
Saturday Mid-Day Peak Hour

average daily, AM and PM peak hour trip generation rates based on 600 dwelling units to forecast traffic generation as opposed to using the corresponding fitted curve equations directly from the ITE manual. Had the fitted curve equations been directly applied to the 2,995 units without adjustment, it would result in lower trip generation forecasts for the residential component. Specifically, the residential component's weekday traffic generation forecast would be about 27% lower during the weekday AM peak hour, 26% lower during the weekday PM peak hour, and 22% lower on a daily basis when compared to the methodology used in the Traffic Impact Study.

Similarly, most of the trip generation surveys contained in the ITE manual for this land use during the Saturday conditions were conducted for existing developments with 400 dwelling units or less. Given the size of the proposed residential component, it is therefore more appropriate and conservative to derive average Saturday daily and mid-day peak hour trip generation rates based on 400 dwelling units to forecast traffic generation as opposed to using the corresponding fitted curve equations directly from the ITE manual. Had the fitted curve equations been directly applied to the 2,995 units without adjustment, it would result in lower trip generation forecasts for the residential component. Specifically, the residential component's Saturday traffic generation forecast would be about 24% lower during the mid-day peak hour and 20% lower on a daily basis when compared to the methodology used in this traffic impact study.

It is recognized that the residential component of the proposed project consists of a wide spectrum of residential product types including some single-family detached homes, attached condominiums/townhouses, and podium units. Thus, use of the ITE Land Use Code 230 (Residential Condominium/ Townhouse) was intended to represent a range of residential product type that could be developed on the Project Site.

It should be noted that the community space component of the project is anticipated to primarily serve the residential component of the project only and, therefore, its potential to generate new trips onto the local street system is negligible.

### *Civic Use Component*

A four acre site is proposed for civic uses which may include a school, a library, a community center, etc. For purposes of the trip generation forecast, it is conservatively assumed that the civic use component could be developed as an elementary school during the weekday AM peak hour analysis time period, since elementary schools typically have higher trip generation potential than libraries or community centers during the AM peak hour. For the weekday PM peak hour and the weekend mid-day peak hour analysis time periods, it is conservatively assumed that the civic use component could be developed as a library, since libraries typically have higher trip generation potential than schools or community centers during the weekday PM peak hour and the weekend mid-day peak hour.

Traffic volumes expected to be generated by the civic use component during the weekday AM peak hour were based upon rates per number of elementary school students. ITE Land Use Code 520 (Elementary School) trip generation average rates were used to forecast the traffic volumes expected to be generated by the civic use during the weekday AM peak hour. Traffic volumes expected to be generated by the civic use component during the weekday PM peak hour and the weekend mid-day peak hour were based

upon rates per thousand square feet of development. ITE Land Use Code 590 (Library) trip generation average rates were used to forecast the traffic volumes expected to be generated by the civic use during the weekday PM peak hour and the weekend mid-day peak hour.

It is anticipated that the elementary school will primarily serve the residential component of the proposed project with a portion of the student population will be coming from other areas of Inglewood. Based on information provided in the Final Developer Fee Justification Study & School Facilities Needs Analysis 2006-2007, Sage Institute Inc., student generation rates of 0.35 student per household for grades K-5 and 0.15 student per household for grades 6-8 are determined. For purposes of the Traffic Impact Study, it is conservatively assumed that approximately one student for every seven residential units (i.e., 0.15 student per household) will be generated by the residential component of the project. Traffic associated with the remaining student population is assumed to be generated to and from other areas of Inglewood.

It is assumed that the library would be 30,000 square feet and would serve the residential component of the proposed project in addition to the existing Inglewood community.

### *Hotel Component*

Traffic volumes expected to be generated by the hotel were based upon rates per occupied rooms. ITE Land Use Code 310 (Hotel) trip generation average rates were used to forecast the traffic volumes expected to be generated by the hotel component. It should be noted that the ITE trip generation rates for hotels have already accounted for hotel supporting facilities such as restaurants, cocktail lounges, meeting rooms, etc. However, a separate trip generation forecast has been developed for the proposed meeting space (20,000 square feet) located within the hotel to provide a conservative analysis as the proposed meeting space may be larger than what is otherwise provided at a typical 300 room hotel. Traffic volumes expected to be generated by the meeting space of the hotel component were based upon rates per thousand square feet of development. As the Trip Generation manual does not provide a hotel meeting room land use category, ITE Land Use Code 495 (Recreational Community Center) trip generation average rates were used to forecast the traffic volumes expected to be generated by the meeting space of the hotel component as this land use provides the “best fit” to the proposed meeting room component.

### *General Office Component*

Traffic volumes expected to be generated by the office component were based upon rates per thousand square feet of development. ITE Land Use Code 710 (General Office) trip generation equation rates were used to forecast the traffic volumes expected to be generated by the office component.

### *Internal Capture and Pass-By Reductions*

In addition to the trip generation forecast for the proposed project (which is essentially an estimate of the number of vehicles that could be expected to enter and exit the site access points), a forecast was made of likely internal capture and pass-by trips, as discussed in the following paragraphs.

Internal capture adjustments refer to a reduction of external trips for mixed-use developments such as the proposed project. Because of the nature of multi-use, or mixed-use, project development land use components (e.g., interaction between the office, retail and residential uses), trip making characteristics are interrelated and some trips are made among the various land uses on-site. These internal trips are not generated on the external street system and can be made either by walking or by vehicles entirely on internal roadways without using streets external to the site. Thus, internal capture trip reduction adjustments were applied to each of the project land use components to account for the trip interactions between the various project land uses. The internal capture rates for the proposed project were estimated based on the methodology outlined in Chapter 7 – Multi-Use Development of the Trip Generation Hand Book, An ITE Recommended Practice, published by ITE, June 2004.

Pass-by trips are made as intermediate stops on the way from an origin to a primary destination without a route diversion. Pass-by trips are attracted from traffic passing the site on an adjacent street or roadway that offers direct access to the site. In this instance, the adjacent roadways to the Project Site include Prairie Avenue and Century Boulevard. The pass-by traffic forecast is based on the methodology and equations contained in Chapter 5 – Pass-by, Primary and Diverted Linked Trips of the Trip Generation Handbook, An ITE Recommended Practice, published by ITE, June 2004. Based on the ITE guidelines, a 23% pass-by reduction adjustment was applied to the proposed retail component of the project during the weekday analysis conditions and a 26% pass-by reduction adjustment was applied to the proposed retail component of the project during the Saturday analysis conditions. No pass-by reductions are applied to any of the other components of the project.

### *Existing Uses To Be Removed*

The project trip generation forecasts also includes a trip generation credit for the existing Hollywood Park Racetrack which will be removed to accommodate the Proposed Project. The existing Casino currently on-site will remain at its current location. As stated in the Circulation Element of the Inglewood General Plan (adopted December 15, 1992), the Hollywood Park racetrack historically accommodated over 50,000 patrons during a race day. A review of the prior Hollywood Park racetrack attendance records during live-horse racing seasons was conducted to determine the appropriate attendance credit. The daily Hollywood Park Racetrack attendance records during live-horse racing seasons for the past seven years are sorted and summarized in the Traffic Impact Study separately for the weekday and weekend conditions. As shown, the highest weekday attendance during the past seven years at the Hollywood Park racetrack was 23,609 patrons. However, to maintain a conservative analysis of project trip generation, a weekday live-horse racing event with an attendance of 10,000 patrons has been assumed for purposes of developing the weekday existing use credit. This represents less than half of the peak recorded attendance in the past seven years and is well below the attendance level as documented in the General Plan.

Similarly, as shown, the highest weekend attendance during the past seven years at the Hollywood Park racetrack was 29,151 patrons. However, to maintain a conservative analysis of project trip generation, a weekend live-horse racing event with an attendance of 15,000 patrons has been assumed for purposes of developing the weekend existing use credit. This represents approximately half of the peak recorded

attendance in the past seven years and is well below the attendance level as documented in the General Plan.

To develop trip generation forecasts appropriately for a 10,000-attendance weekday event and a 15,000-attendance weekend event at the Hollywood Park, additional driveway traffic counts at the Hollywood Park (with and without live horse racing) were conducted and reviewed. The Traffic Impact Study summarizes the methodology and assumptions utilized in the development of trip generation associated with the 10,000-attendance weekday and 15,000-attendance weekend events.

The weekday and weekend project traffic generation forecasts for the proposed project are summarized in the following sub-sections. It should be noted that proposed project traffic generation forecasts include the casino/off-track betting component. Therefore, the existing trip generation credit appropriately also includes traffic generation from the casino use, since the casino is proposed to remain at its current location.

#### *Weekday Project Trip Generation*

The weekday traffic generation forecast for the proposed project is summarized in detail in the Traffic Impact Study. As summarized, the proposed project is expected to generate an additional 1,604 vehicle trips (588 more inbound trips and 1,016 more outbound trips) during the weekday AM peak hour. During the weekday PM peak hour the proposed project is expected to generate 39 fewer vehicle trips (1,298 more inbound trips and 1,337 fewer outbound trips). Over a 24-hour period, the proposed project is forecast to generate an additional 17,222 daily trip ends during a typical weekday (approximately 8,611 inbound trips and 8,611 outbound trips).

#### *Weekend Project Trip Generation*

The weekend traffic generation forecast for the proposed project is summarized in detail in the Traffic Impact Study. As summarized, the proposed project is expected to generate an additional 1,374 vehicle trips (105 more inbound trips and 1,269 more outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, the proposed project is forecast to generate an additional 25,508 daily trip ends during a typical weekend day (approximately 12,754 inbound trips and 12,754 outbound trips).

### **Project Trip Distribution**

Project generated traffic was assigned to the local roadway system based on traffic distribution patterns which accounted for the proposed project land uses, the proposed site access scheme, existing traffic movements, characteristics of the surrounding roadway system and nearby regional population and employment centers.

The forecast project traffic distribution percentages at the 66 study intersections are displayed in the Traffic Impact Study for the retail/office, the casino/off-track betting, the residential, the civic use, and the hotel components, respectively. The forecast project traffic distribution percentages of the existing

site at the 66 study intersections are also displayed in detail in the study for the weekday AM peak hour, the weekday PM peak hour, and the Saturday mid-day peak hour.

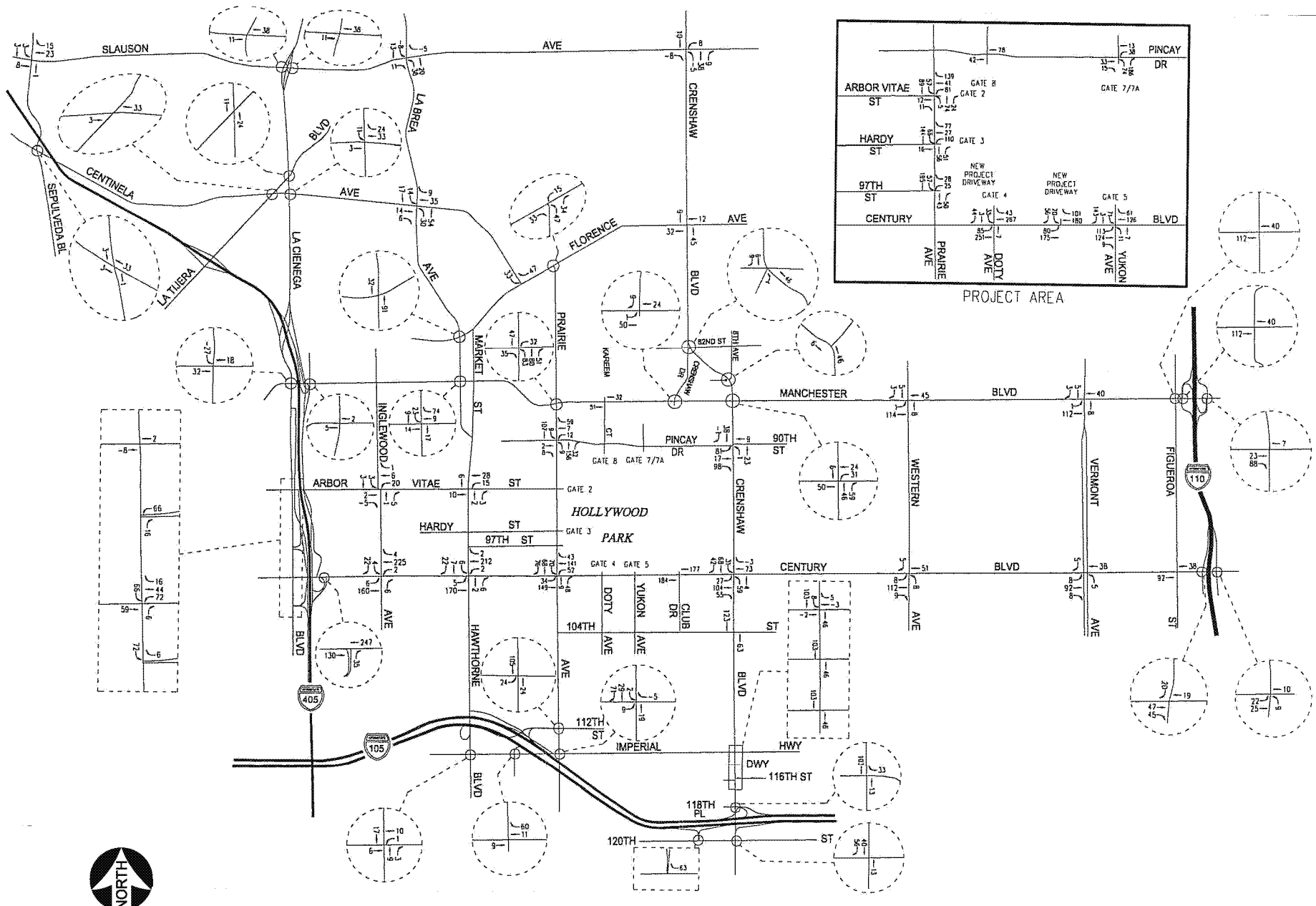
The forecast project traffic volumes for the weekday AM peak hour, weekday PM peak hour, and Saturday mid-day peak hour are displayed in Figures IV.L-7, IV.L-8, and IV.L-9, respectively.

### **Cumulative Development Projects**

A forecast of on-street cumulative traffic conditions was prepared by incorporating the potential trips associated with other known development projects (i.e., “Related Projects”) in the area. With this information, the potential impact of the proposed project and other development projects can be evaluated within the context of the cumulative impact of all ongoing development. The Related Projects research was based on information on file at the City of Inglewood, City of Culver City, City of Hawthorne, City of Los Angeles, and County of Los Angeles Planning Departments. The list of Related Projects in the area is shown in Table III-1, located in Section III. The location of the Related Projects is displayed in Figure III-1, also in Section III.

The Related Projects list for planning purposes included potential City of Inglewood redevelopment projects for which no planning applications have been filed with the City. These added projects were considered for planning purposes even though they have not been applied for in the horizon of the proposed project, because it is possible that the potential applicants may file these projects for consideration. Land use information for some of these sizable projects (i.e., the Forum site, the Home Stretch Project, etc.) was obtained based on discussions with potential applicants and are considered to be speculative in the short term. Although some of the Related Projects may never be pursued or developed, the Traffic Impact Study conservatively assumes their traffic in the cumulative analysis conditions and therefore represents a worst-case analysis. It should be noted that the potential expansion of the Los Angeles International Airport (i.e., the LAX Master Plan) was listed as a related project. However, separate trip generation forecasts have not been developed as its future growth is uncertain at this time and is too speculative to analyze. In addition, the LAX Master Plan is a long term concept for possible future growth and expansion of the facility and has not yet been defined as a specific project while the Hollywood Park Redevelopment project will be developed on a relatively short term basis. It should be noted that although no separate trip generation forecasts have been developed for the LAX Master Plan, this traffic analysis does consider continued growth of the airport through the application of the ambient traffic growth factor.

Traffic volumes expected to be generated by the Related Projects were estimated using accepted generation rates published in the ITE Trip Generation manual. The Related Projects respective traffic generation for the AM and PM peak hours, as well as on a daily basis for a typical weekday, is also presented in detail in the Traffic Impact Study. The Related Projects respective traffic generation for the weekend mid-day peak hour, as well as on a daily basis for a typical weekend day, is presented in the study.



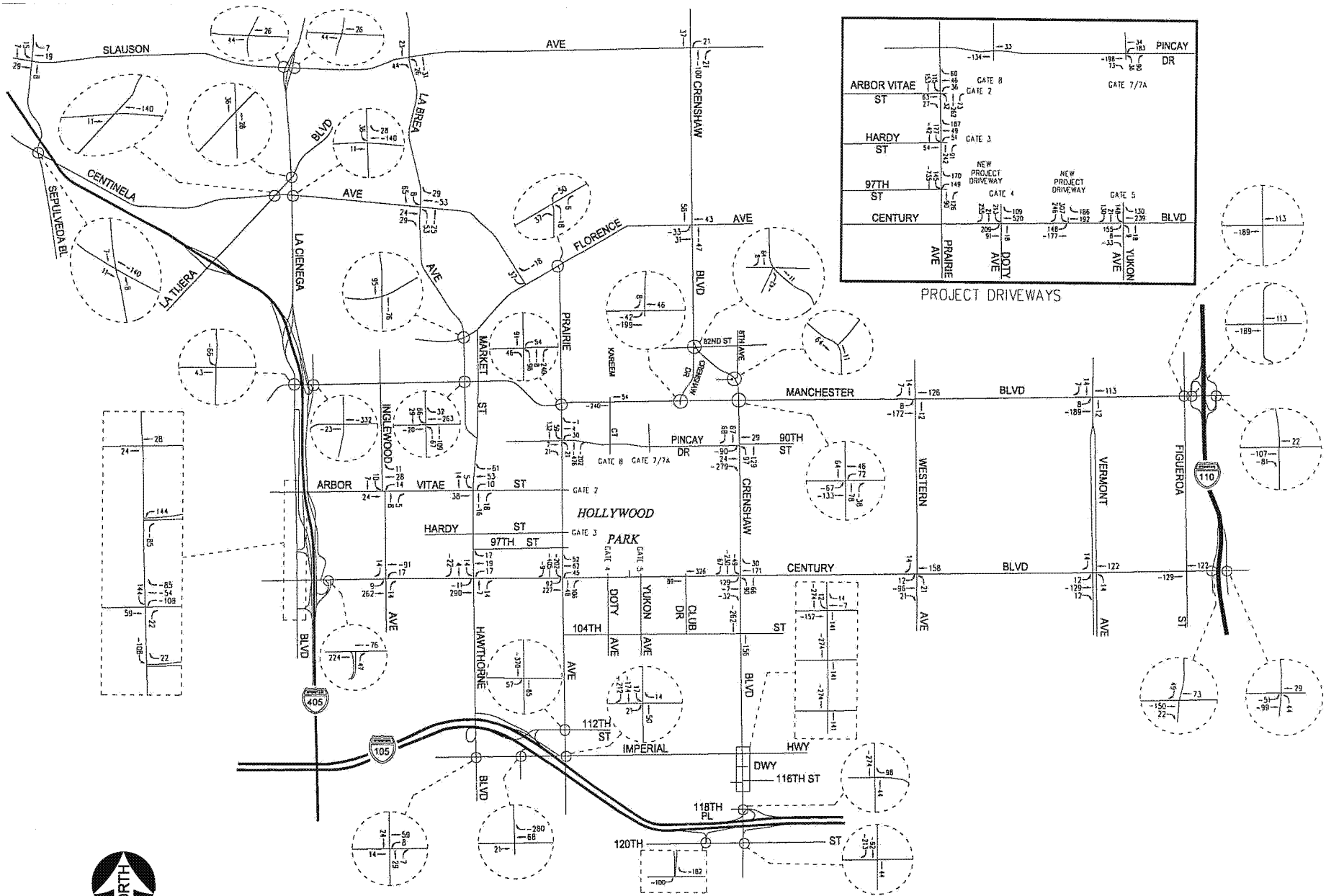
Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-7  
 Project Traffic Volumes  
 Weekday AM Peak Hour



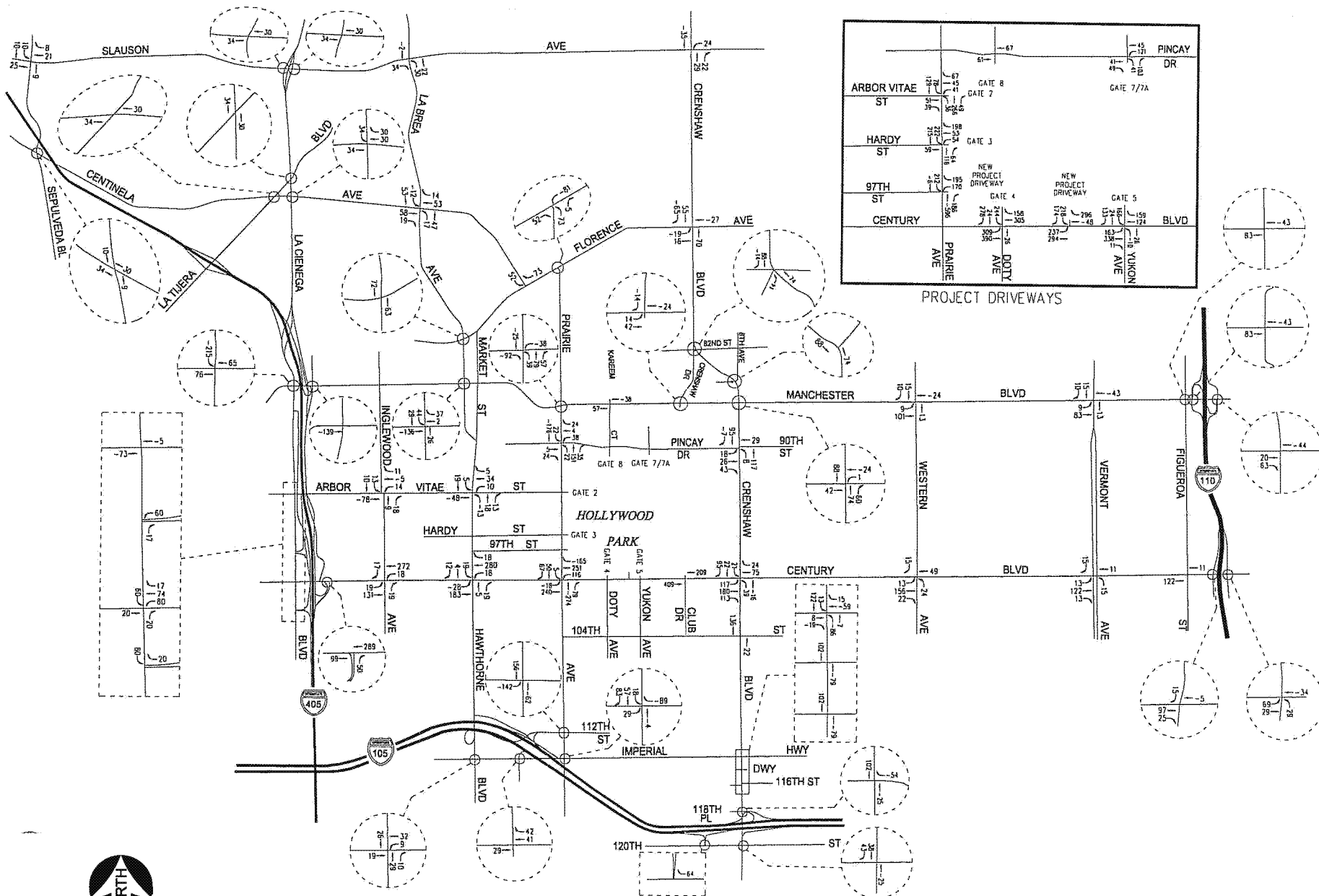


Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-8  
Project Traffic Volumes  
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-9  
Project Traffic Volumes  
Saturday Mid-Day Peak Hour

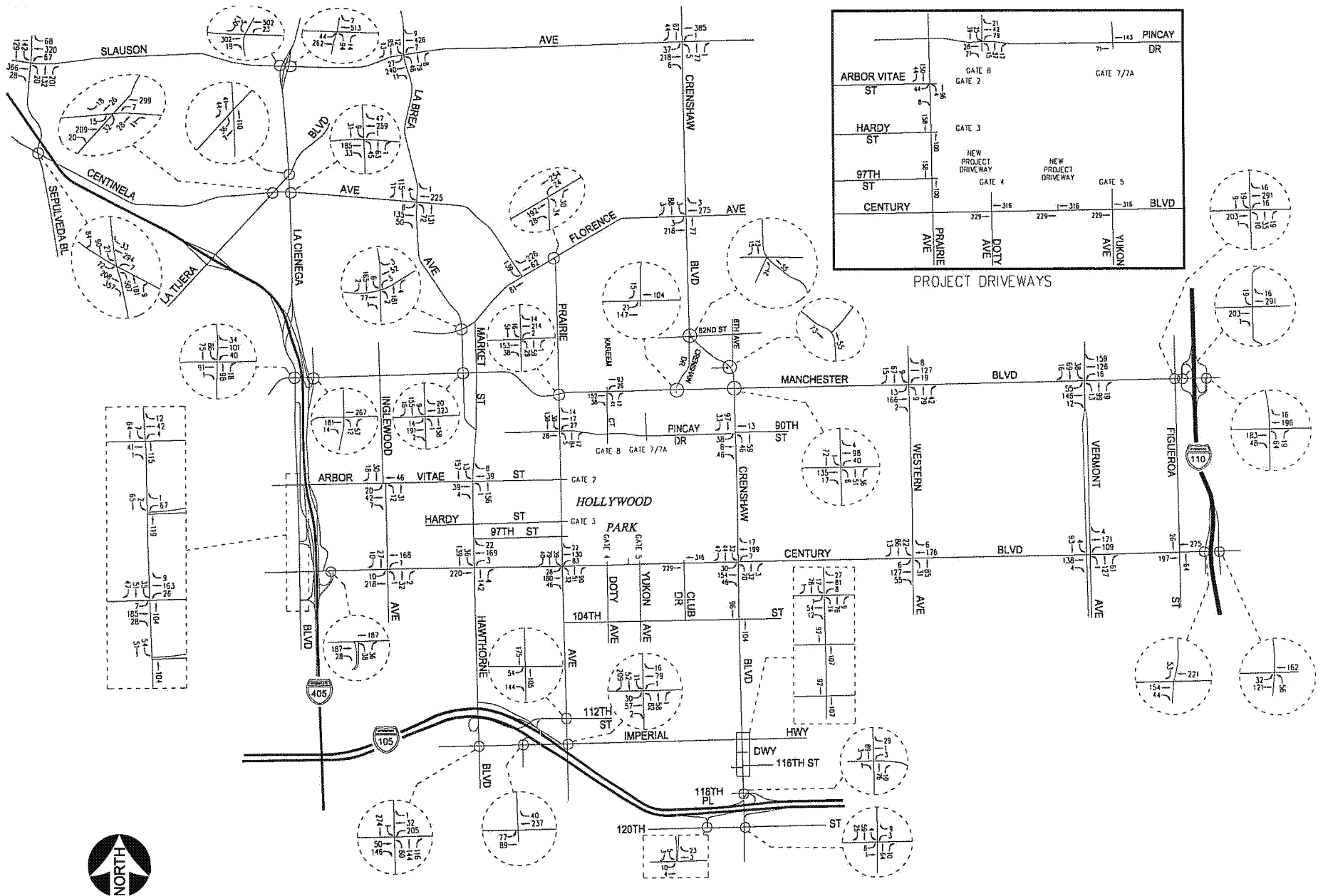
The anticipated distribution of the Related Projects traffic volumes at the 66 study intersections during the weekday AM peak hour, weekday PM peak hour, and Saturday mid-day peak hour are displayed in Figures IV.L-10, IV.L-11, and IV.L-12, respectively. Three sizeable Related Projects in which no planning applications have been filed with the City of Inglewood include the Inglewood Promenade project (Related Project No. I-1), the Forum Site project (Related Project No. I-17), and the Home Stretch project (Related Project No. I-19). Although these sizeable Related Projects represent only three of the 36 related development projects located within the City of Inglewood, they are forecast to account for approximately 74% of the total weekday daily, 57% of the total weekday AM peak hour, and 74% of the total weekday PM peak hour traffic expected to be generated by all potential development projects from the City of Inglewood. Similarly, these three sizeable projects are forecast to account for approximately 78% of the total Saturday daily and 79% of the total Saturday mid-day peak hour traffic expected to be generated by all potential development projects from the City of Inglewood. As indicated above, this traffic impact study conservatively assumes traffic associated with these projects where no planning applications have been filed with the City of Inglewood in the cumulative analysis conditions and therefore represents a worst-case analysis.

In order to account for unknown Related Projects not included in this analysis, the existing traffic volumes were increased at an annual rate of 0.65 percent (0.65%) per year to the year 2014 (i.e., the anticipated year of project build-out). Application of this annual ambient growth factor allows for a conservative worst case forecast of future traffic volumes in the area. A review of the background traffic growth estimates for this area published in the 2004 Congestion Management Program for Los Angeles County, indicate that existing traffic volumes would be expected to increase at an annual rate of approximately 0.65 percent (0.65% per year) between 2005 and 2015. Thus, the annual growth rate of 0.65 percent (0.65%) per year to the year 2014 is consistent and appropriate.

### **Traffic Impact Analysis Methodology**

The 66 study intersections were evaluated using the Intersection Capacity Utilization (ICU) method of analysis which determines Volume-to-Capacity (v/c) ratios on a critical lane basis. The ICU method is required for use by the City of Inglewood. Twenty-eight (28) of the 66 study intersections are located in neighboring cities or unincorporated County of Los Angeles boundaries adjacent to the City of Inglewood.

In addition to the traffic analysis using the City of Inglewood ICU methodology, a supplemental traffic analysis was prepared for those study intersections located outside of City of Inglewood. The supplemental traffic analysis was prepared using the methodologies of the respective jurisdictions where the intersections are located. Specifically, the Critical Movement Analysis (CMA) method was used to determine Volume-to-Capacity ratios and corresponding Levels of Service at the 19 study intersections located in the City of Los Angeles and the one study intersection located in the City of Culver City. The ICU method was used to determine Volume-to-Capacity ratios and corresponding Levels of Service at the five study intersections located in the City of Hawthorne and the three study intersections located in the County of Los Angeles.

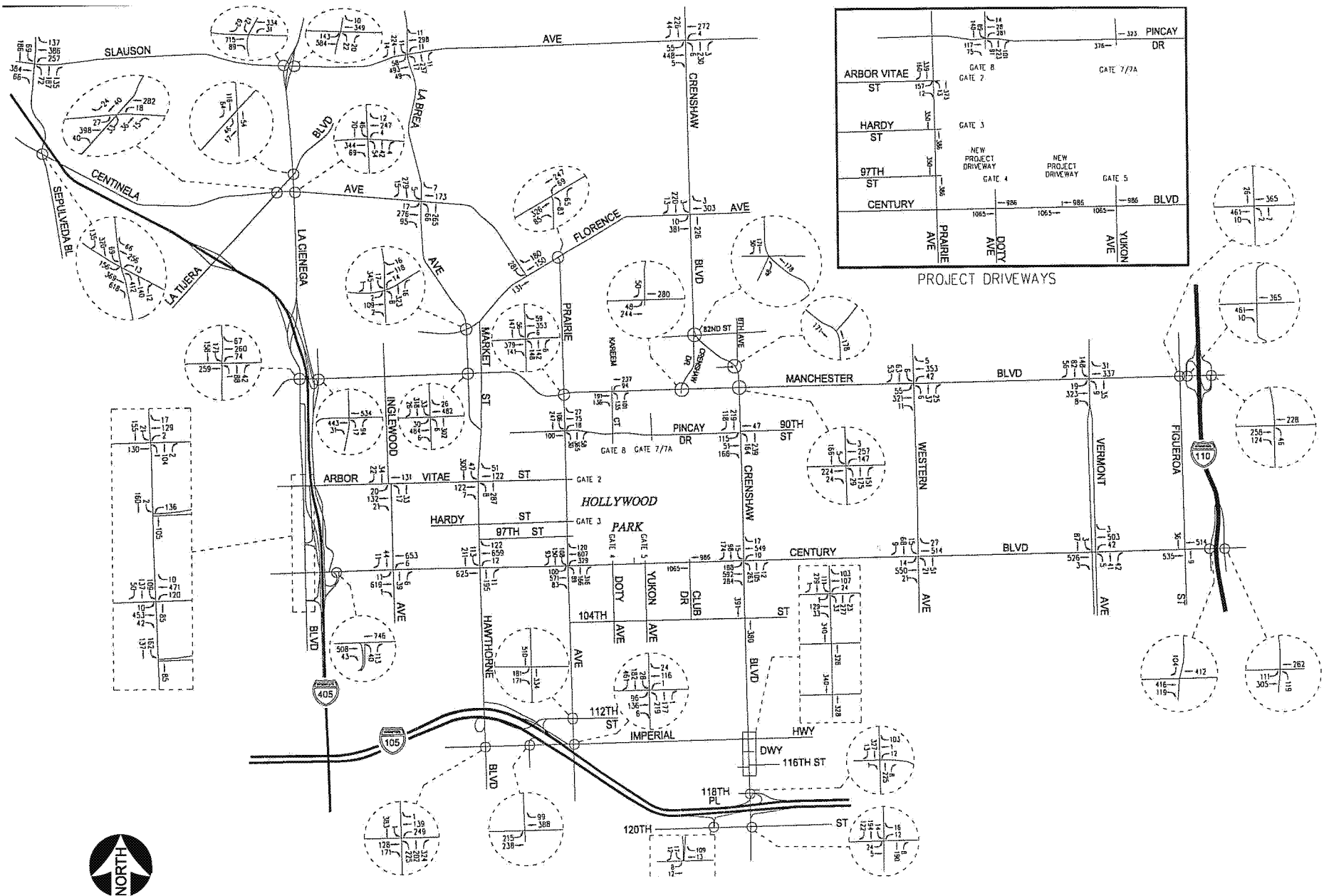


Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-10  
Related Projects Traffic Volumes  
Weekday AM Peak Hour

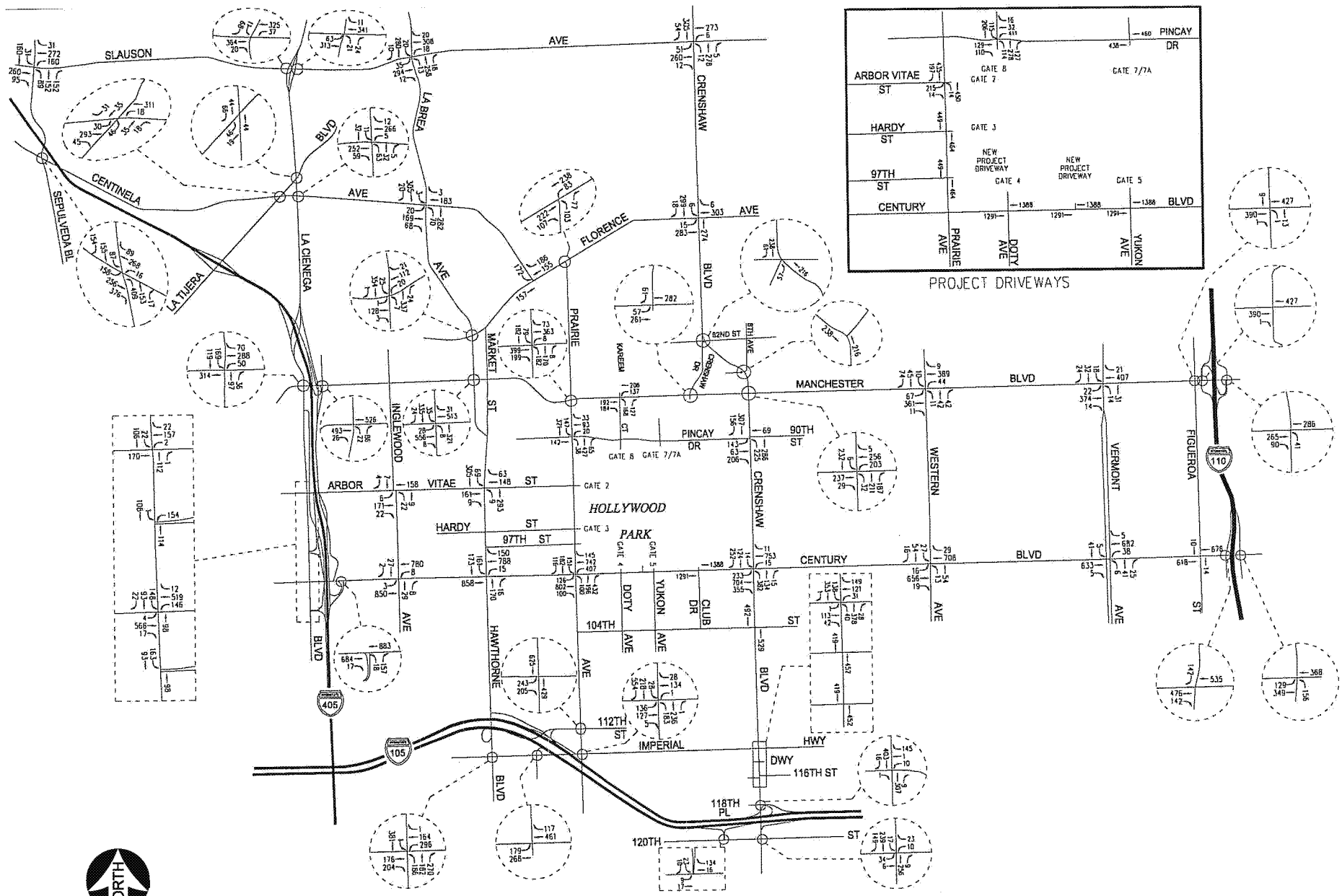


Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-11  
Related Projects Traffic Volumes  
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, August 1, 2008



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**Figure IV.L-12**  
Related Projects Traffic Volumes  
Saturday Mid-Day Peak Hour

For both the ICU and CMA methodologies, the overall intersection v/c ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. The Levels of Service varies from LOS A (free flow) to LOS F (jammed condition). It should be noted that LOS D is typically recognized as the minimum acceptable level of service in urban areas. A description of both the ICU and CMA methods and corresponding Levels of Service is provided in detail in the Traffic Impact Study.

## **ENVIRONMENTAL IMPACTS**

### **Impact Criteria and Thresholds**

The relative impact of the added project traffic volumes expected to be generated by the proposed project during the weekday AM peak hour, PM peak hour, and the Saturday mid-day peak hour was evaluated based on analysis of future operating conditions at the 66 study intersections, without and with the proposed project. The previously discussed capacity analysis procedures were utilized to evaluate the future v/c relationships and service level characteristics at each study intersection.

Each study intersection was evaluated for potential traffic impacts using the City of Inglewood significant traffic impact thresholds. Additionally, each study intersection outside the City of Inglewood was evaluated on a supplemental basis using the significant traffic impact criteria utilized in the jurisdiction of the intersection (e.g., study intersections in the City of Los Angeles were evaluated for potential traffic impacts using the criteria of the Lead Agency, the City of Inglewood, as well as the City of Los Angeles).

#### *City of Inglewood Impact Criteria*

Per the City of Inglewood's policy, the significance of the potential impacts of project generated traffic at each study intersection was identified using criteria set forth in the 2004 Congestion Management Program for Los Angeles County, County of Los Angeles Metropolitan Transportation Authority, July 2004 (CMP) manual. A significant transportation impact is determined based on a change in the calculated v/c ratio of two percent (0.02) or more due to project-related traffic for an intersection operating at LOS F or worse ( $v/c > 1.00$ ).

Using these criteria, for example, the project would not have a significant impact on an intersection if it is operating at LOS E or better after the addition of project traffic. However, if the intersection is operating at LOS F after the addition of project traffic and the project related increase in v/c ratio is 0.020 or more, then a significant project impact would result at the intersection. These criteria were applied to all 66 study intersections.

The ICU calculations utilize a lane capacity of 1,600 vehicles per hour (vph) for left-turn, through and right-turn lanes, a dual turn lane capacity of 2,880 vph and a clearance of 0.10, and are consistent with the City of Inglewood criteria.

As previously mentioned, an annual rate of 0.65 percent (0.65%) ambient growth rate was assumed to account for unknown Related Projects in the vicinity of the proposed project. Additionally, it was assumed that the proposed project will be completed and occupied by the year 2014.

Adjacent cities have different criteria and methodologies for measuring traffic impacts. For informational purposes, the Traffic Impact Study presents additional impact analyses utilizing those other cities' respective criteria.

### **Traffic Impact Analysis Scenarios**

Level of Service calculations at all 66 study intersections were analyzed for the following impact analysis conditions, which are consistent with methodologies required by the County of Los Angeles:

- (a) Existing conditions.
- (b) Condition (a) with 0.65 percent (0.65%) ambient traffic growth through year 2014.
- (c) Condition (b) with completion and occupancy of the proposed project.
- (d) Condition (c) with implementation of project mitigation measures, where necessary.
- (e) Condition (d) with completion and occupancy of the Related Projects, without any potential mitigation measures from the Related Projects.
- (f) Condition (e) with implementation of cumulative mitigation measures, where necessary.

The traffic volumes for each new condition were added to the volumes in the prior condition to determine the change in capacity utilization at the 66 study intersections.

### **Traffic Impact Analysis Method**

A methodology used by some agencies involves a future baseline condition whereby traffic associated with ambient growth as well as Related Projects is considered in the traffic analysis prior to the consideration of the potential traffic impacts associated with the proposed project. This alternative methodology is not recommended for consideration by the decision makers for this project as this methodology substantially over-states the future pre-project traffic levels of congestion due to the requirement to include traffic associated with all of the Related Projects, many of which are highly speculative, may never be pursued or developed, and indeed in several cases have not even been applied for (refer to Section III, Related Projects for a discussion of cumulative development projects and inclusion of Related Projects with no planning applications filed at the City of Inglewood). Further, this methodology requires Related Projects traffic be included in the future baseline conditions but not any of the potential mitigation measures associated with the Related Projects. As a result, this methodology places an undue burden on the proposed project to essentially mitigate its traffic effects, plus the adverse effects caused by the Related Projects.

The Traffic Impact Study for this EIR utilizes the traffic impact analysis methodology consistent with and required by the County of Los Angeles. This methodology utilized in this traffic analysis appropriately considers traffic generated by the proposed project in a future baseline generated by reasonably



foreseeable ambient traffic growth and requires the project to mitigate its direct impacts under this future condition. In addition, the proposed project is required to contribute on a fair share basis to improvements associated with potential impacts caused on a cumulative basis by the project and the Related Projects. This methodology is applied to all 66 study intersections. For the results of the traffic analysis using alternative methodologies please see the Traffic Impact Study.

## **CITY OF INGLEWOOD TRAFFIC ANALYSIS**

The traffic impact analysis prepared for all 66 study intersections using the ICU methodology and application of the City of Inglewood significant traffic impact criteria is summarized in Table IV.L-2. The ICU data worksheets for the analyzed intersections are contained in detail in the Traffic Impact Study.

### **Existing Conditions**

#### *Weekday Existing Conditions*

As indicated in Table IV.L-2, 17 of the 65 existing study intersections are presently operating at LOS E or worse during the weekday AM and/or PM peak hours under existing conditions. The remaining 48 existing study intersections are currently operating at LOS D or better during both the weekday AM and PM peak hours. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are displayed in Figures IV.L-4 and IV.L-5, respectively.

#### *Saturday Existing Conditions*

As indicated in Table IV.L-2, four of the 65 existing study intersections are presently operating at LOS E or worse during the Saturday mid-day peak hour under existing conditions. The remaining 61 existing study intersections are currently operating at LOS D or better during the Saturday mid-day peak hour. As previously mentioned, the existing traffic volumes at the study intersections during the Saturday mid-day peak hour are displayed in Figure IV.L-6.

### **Existing With Ambient Growth Conditions**

#### *Weekday Existing With Ambient Growth Conditions*

Growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors was assumed to be 0.65 percent (0.65%) per year through the year 2014. This growth in ambient traffic incrementally increases the v/c ratios at all of the study intersections. As shown in Table IV.L-2, 22 of the 65 existing study intersections are expected to operate at LOS E or worse during the weekday AM and/or PM peak hours with the addition of ambient growth traffic through year 2014. The remaining 43 existing study intersections are expected to continue to operate at LOS D or better during both the weekday AM and PM peak hours. The existing with ambient growth traffic volumes at the study intersections during the weekday AM and PM peak hours are displayed in Figures IV.L-13 and IV.L-14, respectively.

Table IV.L-2

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS		
1	Sepulveda Boulevard/ Slauson Avenue <sup>a</sup>	AM	0.704	C	0.739	C	0.750	C	0.011	0.750	C	0.011	0.944	E	0.205	0.887	D	0.148
	PM	0.721	C	0.757	C	0.762	C	0.005	0.762	C	0.005	<b>1.054</b>	<b>F</b>	<b>0.297</b>	<b>0.980</b>	<b>E</b>	<b>0.223</b>	
	SAT	0.710	C	0.746	C	0.756	C	0.010	0.756	C	0.010	0.901	E	0.155	0.834	D	0.088	
2	Sepulveda Boulevard/ Centinela Avenue <sup>b</sup>	AM	0.762	C	0.800	C	0.811	D	0.011	0.811	D	0.011	<b>1.153</b>	<b>F</b>	<b>0.353</b>	<b>0.949</b>	<b>E</b>	<b>0.149</b>
	PM	0.839	D	0.881	D	0.885	D	0.004	0.885	D	0.004	<b>1.176</b>	<b>F</b>	<b>0.295</b>	<b>0.985</b>	<b>E</b>	<b>0.104</b>	
	SAT	0.665	B	0.698	B	0.709	C	0.011	0.709	C	0.011	<b>1.094</b>	<b>F</b>	<b>0.396</b>	<b>0.887</b>	<b>D</b>	<b>0.189</b>	
3	La Cienega Boulevard (SB)/Slauson Avenue <sup>c</sup>	AM	0.704	C	0.736	C	0.744	C	0.008	0.744	C	0.008	0.890	D	0.154	0.790	C	0.054
	PM	0.850	D	0.889	D	0.898	D	0.009	0.898	D	0.009	<b>1.076</b>	<b>F</b>	<b>0.187</b>	<b>0.976</b>	<b>E</b>	<b>0.087</b>	
	SAT	0.711	C	0.743	C	0.750	C	0.007	0.750	C	0.007	0.855	D	0.112	0.755	C	0.012	
4	La Cienega Boulevard (NB)/Slauson Avenue <sup>c</sup>	AM	0.730	C	0.762	C	0.770	C	0.008	0.770	C	0.008	0.921	E	0.159	0.921	E	0.159
	PM	0.613	B	0.640	B	0.645	B	0.005	0.645	B	0.005	0.780	C	0.140	0.780	C	0.140	
	SAT	0.583	A	0.608	B	0.614	B	0.006	0.614	B	0.006	0.714	C	0.106	0.714	C	0.106	
5	La Tijera Boulevard/ Centinela Avenue <sup>b</sup>	AM	0.853	D	0.896	D	0.906	E	0.010	0.906	E	0.010	<b>1.029</b>	<b>F</b>	<b>0.133</b>	<b>0.999</b>	<b>E</b>	<b>0.103</b>
	PM	0.823	D	0.864	D	0.821	D	-0.043	0.821	D	-0.043	0.936	E	0.072	0.906	E	0.042	
	SAT	0.769	C	0.807	D	0.817	D	0.010	0.817	D	0.010	0.898	D	0.091	0.868	D	0.061	
6	La Cienega Boulevard/ La Tijera Boulevard <sup>b</sup>	AM	0.739	C	0.776	C	0.779	C	0.003	0.779	C	0.003	0.798	C	0.022	0.798	C	0.022
	PM	0.864	D	0.907	E	0.915	E	0.008	0.915	E	0.008	0.953	E	0.046	0.953	E	0.046	
	SAT	0.668	B	0.701	C	0.708	C	0.007	0.708	C	0.007	0.731	C	0.030	0.731	C	0.030	
7	La Cienega Boulevard/ Centinela Avenue <sup>b</sup>	AM	0.959	E	1.008	F	1.018	F	0.010	1.018	F	0.010	<b>1.134</b>	<b>F</b>	<b>0.126</b>	<b>1.007</b>	<b>F</b>	<b>-0.001</b>
	PM	0.918	E	0.965	E	0.989	E	0.024	0.989	E	0.024	<b>1.116</b>	<b>F</b>	<b>0.151</b>	<b>0.998</b>	<b>E</b>	<b>0.033</b>	
	SAT	0.828	D	0.869	D	0.876	D	0.007	0.876	D	0.007	0.990	E	0.121	0.873	D	0.004	
8	La Cienega Boulevard/ Manchester Boulevard <sup>d</sup>	AM	1.005	F	1.052	F	1.051	F	-0.001	1.051	F	-0.001	1.141	F	0.089	1.141	F	0.089
	PM	0.815	D	0.852	D	0.851	D	-0.001	0.851	D	-0.001	1.023	F	0.171	1.023	F	0.171	
	SAT	0.726	C	0.759	C	0.741	C	-0.018	0.741	C	-0.018	0.911	E	0.152	0.911	E	0.152	

**Table IV.L-2 (Continued)**  
**Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
9	I-405 Freeway NB Ramps/Manchester Boulevard <sup>d</sup>	AM	0.884	D	0.925	E	0.925	E	0.000	0.925	E	0.000	0.985	E	0.060	0.985	E	0.060
	PM	0.681	B	0.711	C	0.704	C	-0.007	0.704	C	-0.007	0.865	D	0.154	0.865	D	0.154	
	SAT	0.569	A	0.593	A	0.593	A	0.000	0.593	A	0.000	0.725	C	0.132	0.725	C	0.132	
10	La Cienega Boulevard/Arbor Vitae Street <sup>d</sup>	AM	0.800	C	0.836	D	0.837	D	0.001	0.837	D	0.001	0.870	D	0.034	0.770	C	-0.066
	PM	0.961	E	1.006	F	1.014	F	0.008	1.014	F	0.008	<b>1.104</b>	<b>F</b>	<b>0.098</b>	<b>1.004</b>	<b>F</b>	<b>-0.002</b>	
	SAT	0.509	A	0.531	A	0.508	A	-0.023	0.508	A	-0.023	0.611	B	0.080	0.511	A	-0.020	
11	La Cienega Boulevard/I-405 Freeway SB Ramps (n/o Century Boulevard) <sup>b</sup>	AM	0.837	D	0.879	D	0.899	D	0.020	0.899	D	0.020	0.959	E	0.080	0.959	E	0.080
	PM	0.610	B	0.640	B	0.685	B	0.045	0.685	B	0.045	0.761	C	0.121	0.761	C	0.121	
	SAT	0.465	A	0.488	A	0.507	A	0.019	0.507	A	0.019	0.591	A	0.103	0.591	A	0.103	
12	La Cienega Boulevard/Century Boulevard <sup>b</sup>	AM	0.733	C	0.770	C	0.821	D	0.051	0.821	D	0.051	0.886	D	0.116	0.856	D	0.086
	PM	0.690	B	0.724	C	0.774	C	0.050	0.774	C	0.050	<b>1.023</b>	<b>F</b>	<b>0.299</b>	<b>0.993</b>	<b>E</b>	<b>0.269</b>	
	SAT	0.530	A	0.556	A	0.648	B	0.092	0.648	B	0.092	0.980	E	0.424	0.950	E	0.394	
13	La Cienega Boulevard/I-405 Freeway SB Ramps (s/o Century Boulevard) <sup>b</sup>	AM	0.455	A	0.477	A	0.504	A	0.027	0.504	A	0.027	0.555	A	0.078	0.555	A	0.078
	PM	0.577	A	0.605	B	0.576	A	-0.029	0.576	A	-0.029	0.658	B	0.053	0.658	B	0.053	
	SAT	0.385	A	0.404	A	0.438	A	0.034	0.438	A	0.034	0.526	A	0.122	0.526	A	0.122	
14	I-405 Freeway NB Ramps/Century Boulevard <sup>d</sup>	AM	0.814	D	0.851	D	0.902	E	0.051	0.902	E	0.051	0.954	E	0.103	0.854	D	0.003
	PM	0.661	B	0.690	B	0.766	C	0.076	0.766	C	0.076	0.945	E	0.255	0.845	D	0.155	
	SAT	0.446	A	0.464	A	0.506	A	0.042	0.506	A	0.042	0.788	C	0.324	0.688	B	0.224	
15	Inglewood Avenue/Arbor Vitae Street <sup>d</sup>	AM	0.930	E	0.973	E	0.983	E	0.010	0.983	E	0.010	<b>1.073</b>	<b>F</b>	<b>0.100</b>	<b>0.922</b>	<b>E</b>	<b>-0.051</b>
	PM	0.913	E	0.955	E	0.992	E	0.037	0.992	E	0.037	<b>1.130</b>	<b>F</b>	<b>0.175</b>	<b>0.906</b>	<b>E</b>	<b>-0.049</b>	
	SAT	0.688	B	0.718	C	0.701	C	-0.017	0.701	C	-0.017	0.821	D	0.103	0.821	D	0.103	
16	Inglewood Avenue/Century Boulevard <sup>d</sup>	AM	0.744	C	0.777	C	0.831	D	0.054	0.831	D	0.054	0.893	D	0.116	0.793	C	0.016
	PM	0.780	C	0.816	D	0.881	D	0.065	0.881	D	0.065	<b>1.041</b>	<b>F</b>	<b>0.225</b>	<b>0.941</b>	<b>E</b>	<b>0.125</b>	
	SAT	0.590	A	0.615	B	0.673	B	0.058	0.673	B	0.058	0.856	D	0.241	0.756	C	0.141	

**Table IV.L-2 (Continued)**  
**Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
17	La Brea Avenue/ Slauson Avenue <sup>c</sup>	AM	0.768	C	0.803	D	0.829	D	0.026	0.829	D	0.026	0.997	E	0.194	0.856	D	0.053
	PM	0.895	D	0.937	E	0.969	E	0.032	0.969	E	0.032	<b>1.170</b>	<b>F</b>	<b>0.233</b>	<b>0.973</b>	<b>E</b>	<b>0.036</b>	
	SAT	0.800	C	0.837	D	0.855	D	0.018	0.855	D	0.018	<b>1.069</b>	<b>F</b>	<b>0.232</b>	<b>0.898</b>	<b>D</b>	<b>0.061</b>	
18	La Brea Avenue/ Centinela Avenue <sup>d</sup>	AM	0.925	E	0.968	E	<b>1.004</b>	<b>F</b>	<b>0.036</b>	<b>0.904</b>	<b>E</b>	<b>-0.064</b>	1.043	F	0.075	1.043	F	0.075
	PM	0.829	D	0.867	D	0.868	D	0.001	0.768	C	-0.099	0.981	E	0.114	0.981	E	0.114	
	SAT	0.886	D	0.927	E	0.971	E	0.044	0.871	D	-0.056	1.086	F	0.159	1.086	F	0.159	
19	La Brea Avenue/ Florence Avenue <sup>d</sup>	AM	1.153	F	1.208	F	<b>1.236</b>	<b>F</b>	<b>0.028</b>	<b>1.136</b>	<b>F</b>	<b>-0.072</b>	1.215	F	0.007	1.215	F	0.007
	PM	1.109	F	1.162	F	<b>1.192</b>	<b>F</b>	<b>0.030</b>	<b>1.092</b>	<b>F</b>	<b>-0.070</b>	1.248	F	0.086	1.248	F	0.086	
	SAT	0.716	C	0.748	C	0.768	C	0.020	0.668	B	-0.080	0.839	D	0.091	0.839	D	0.091	
20	La Brea Avenue/ Manchester Boulevard <sup>d</sup>	AM	0.916	E	0.959	E	0.981	E	0.022	0.981	E	0.022	<b>1.115</b>	<b>F</b>	<b>0.156</b>	<b>0.917</b>	<b>E</b>	<b>-0.042</b>
	PM	0.754	C	0.788	C	0.770	C	-0.018	0.770	C	-0.018	1.036	F	0.248	0.903	E	0.115	
	SAT	0.848	D	0.887	D	0.923	E	0.036	0.923	E	0.036	<b>1.223</b>	<b>F</b>	<b>0.336</b>	<b>0.971</b>	<b>E</b>	<b>0.084</b>	
21	La Brea Avenue/ Arbor Vitae Street <sup>d</sup>	AM	0.643	B	0.671	B	0.686	B	0.015	0.686	B	0.015	0.751	C	0.080	0.751	C	0.080
	PM	0.787	C	0.822	D	0.855	D	0.033	0.855	D	0.033	0.999	E	0.177	0.999	E	0.177	
	SAT	0.637	B	0.665	B	0.637	B	-0.028	0.637	B	-0.028	0.807	D	0.142	0.807	D	0.142	
22	La Brea Avenue/ Century Boulevard <sup>d</sup>	AM	0.783	C	0.819	D	0.871	D	0.052	0.771	C	-0.048	0.862	D	0.043	0.862	D	0.043
	PM	0.893	D	0.934	E	<b>1.001</b>	<b>F</b>	<b>0.067</b>	<b>0.901</b>	<b>E</b>	<b>-0.033</b>	1.101	F	0.167	1.101	F	0.167	
	SAT	0.738	C	0.771	C	0.824	D	0.053	0.724	C	-0.047	1.008	F	0.237	1.008	F	0.237	
23	Hawthorne Boulevard/ Imperial Highway <sup>e</sup>	AM	0.799	C	0.835	D	0.841	D	0.006	0.841	D	0.006	0.940	E	0.105	0.756	C	-0.079
	PM	0.910	E	0.952	E	0.964	E	0.012	0.964	E	0.012	<b>1.385</b>	<b>F</b>	<b>0.433</b>	<b>0.987</b>	<b>E</b>	<b>0.035</b>	
	SAT	0.599	A	0.625	B	0.641	B	0.016	0.641	B	0.016	0.950	E	0.325	0.653	B	0.028	
24	Centinela Avenue/ Florence Avenue <sup>d</sup>	AM	0.950	E	0.994	E	1.005	F	0.011	1.005	F	0.011	<b>1.073</b>	<b>F</b>	<b>0.079</b>	<b>0.917</b>	<b>E</b>	<b>-0.077</b>
	PM	0.942	E	0.985	E	0.998	E	0.013	0.998	E	0.013	<b>1.143</b>	<b>F</b>	<b>0.158</b>	<b>0.919</b>	<b>E</b>	<b>-0.066</b>	
	SAT	0.694	B	0.725	C	0.743	C	0.018	0.743	C	0.018	0.851	D	0.126	0.703	C	-0.022	

**Table IV.L-2 (Continued)**  
**Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
25	Prairie Avenue/ Florence Avenue <sup>d</sup>	AM	0.984	E	1.030	F	<b>1.056</b>	F	<b>0.026</b>	<b>0.956</b>	E	<b>-0.074</b>	1.023	F	-0.007	1.023	F	-0.007
	PM	0.975	E	1.020	F	<b>1.045</b>	F	<b>0.025</b>	<b>0.945</b>	E	<b>-0.075</b>	1.085	F	0.065	1.085	F	0.065	
	SAT	0.634	B	0.662	B	0.637	B	-0.025	0.537	A	-0.125	0.671	B	0.009	0.671	B	0.009	
26	Prairie Avenue/ Manchester Boulevard <sup>d</sup>	AM	0.688	B	0.719	C	0.744	C	0.025	0.744	C	0.025	0.839	D	0.120	0.739	C	0.020
	PM	0.901	E	0.942	E	0.983	E	0.041	0.983	E	0.041	<b>1.174</b>	<b>F</b>	<b>0.232</b>	<b>0.985</b>	<b>E</b>	<b>0.043</b>	
	SAT	0.719	C	0.751	C	0.733	C	-0.018	0.733	C	-0.018	0.965	E	0.214	0.831	D	0.080	
27	Prairie Avenue/ Kelso Street-Pincay Drive <sup>d</sup>	AM	0.554	A	0.577	A	0.659	B	0.082	0.659	B	0.082	0.708	C	0.131	0.708	C	0.131
	PM	0.769	C	0.804	D	0.736	C	-0.068	0.736	C	-0.068	0.964	E	0.160	0.964	E	0.160	
	SAT	0.520	A	0.541	A	0.636	B	0.095	0.636	B	0.095	0.931	E	0.390	0.931	E	0.390	
28	Prairie Avenue/ Arbor Vitae Street-Gate 2 <sup>d</sup>	AM	0.553	A	0.576	A	0.603	B	0.027	0.603	B	0.027	0.674	B	0.098	0.674	B	0.098
	PM	0.794	C	0.826	D	0.740	C	-0.086	0.740	C	-0.086	0.904	E	0.078	0.904	E	0.078	
	SAT	0.731	C	0.751	C	0.643	B	-0.108	0.643	B	-0.108	0.850	D	0.099	0.850	D	0.099	
29	Prairie Avenue/ Hardy Street-Gate 3 <sup>d</sup>	AM	0.449	A	0.467	A	0.538	A	0.071	0.538	A	0.071	0.571	A	0.104	0.571	A	0.104
	PM	0.760	C	0.785	C	0.644	B	-0.141	0.644	B	-0.141	0.724	C	-0.061	0.724	C	-0.061	
	SAT	0.739	C	0.754	C	0.634	B	-0.120	0.634	B	-0.120	0.730	C	-0.024	0.730	C	-0.024	
30	Prairie Avenue/ Century Boulevard <sup>d</sup>	AM	0.814	D	0.851	D	0.885	D	0.034	0.885	D	0.034	<b>1.028</b>	<b>F</b>	<b>0.177</b>	<b>0.928</b>	<b>E</b>	<b>0.077</b>
	PM	0.982	E	1.028	F	1.017	F	-0.011	1.017	F	-0.011	1.465	F	0.437	1.365	F	0.337	
	SAT	0.964	E	1.009	F	0.997	E	-0.012	0.997	E	-0.012	1.664	F	0.655	1.564	F	0.555	
31	Prairie Avenue/ I-105 Freeway EB -WB Off Ramps- 112th Street <sup>d</sup>	AM	0.668	B	0.697	B	0.728	C	0.031	0.728	C	0.031	0.819	D	0.122	0.819	D	0.122
	PM	0.756	C	0.790	C	0.713	C	-0.077	0.713	C	-0.077	0.926	E	0.136	0.926	E	0.136	
	SAT	0.669	B	0.699	B	0.731	C	0.032	0.731	C	0.032	0.990	E	0.291	0.990	E	0.291	
32	I-105 Freeway EB On Ramp-Freeman Avenue/Imperial Highway <sup>e</sup>	AM	0.699	B	0.730	C	0.741	C	0.011	0.741	C	0.011	0.832	D	0.102	0.832	D	0.102
	PM	0.548	A	0.572	A	0.538	A	-0.034	0.538	A	-0.034	0.749	C	0.177	0.749	C	0.177	
	SAT	0.546	A	0.570	A	0.583	A	0.013	0.583	A	0.013	0.785	C	0.215	0.785	C	0.215	

**Table IV.L-2 (Continued)**  
**Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
33	Prairie Avenue/ Imperial Highway <sup>g</sup>	AM	0.868	D	0.908	E	0.922	E	0.014	0.922	E	0.014	<b>1.005</b>	<b>F</b>	<b>0.097</b>	<b>0.905</b>	E	<b>-0.003</b>
	PM	0.872	D	0.912	E	0.868	D	-0.044	0.868	D	-0.044	1.020	F	0.108	0.920	E	0.008	
	SAT	0.686	B	0.717	C	0.734	C	0.017	0.734	C	0.017	0.985	E	0.268	0.885	D	0.168	
34	Cemetery Driveway- Kareem Court/ Manchester Boulevard <sup>d</sup>	AM	0.593	A	0.618	B	0.625	B	0.007	0.625	B	0.007	0.670	B	0.052	0.670	B	0.052
	PM	0.491	A	0.512	A	0.462	A	-0.050	0.462	A	-0.050	0.673	B	0.161	0.673	B	0.161	
	SAT	0.387	A	0.402	A	0.394	A	-0.008	0.394	A	-0.008	0.661	B	0.259	0.661	B	0.259	
35	Crenshaw Drive-Briarwood Lane/ Manchester Boulevard <sup>d</sup>	AM	0.913	E	0.955	E	0.969	E	0.014	0.969	E	0.014	<b>1.024</b>	<b>F</b>	<b>0.069</b>	<b>0.924</b>	<b>E</b>	<b>-0.031</b>
	PM	0.552	A	0.576	A	0.569	A	-0.007	0.569	A	-0.007	0.718	C	0.142	0.618	B	0.042	
	SAT	0.577	A	0.602	B	0.595	A	-0.007	0.595	A	-0.007	0.756	C	0.154	0.656	B	0.054	
36	Kareem Court-Gate 8 Pincay Drive <sup>d</sup>	AM	0.275	A	0.284	A	0.308	A	0.024	0.308	A	0.024	0.386	A	0.102	0.386	A	0.102
	PM	0.334	A	0.345	A	0.303	A	-0.042	0.303	A	-0.042	0.854	D	0.509	0.854	D	0.509	
	SAT	0.237	A	0.246	A	0.267	A	0.021	0.267	A	0.021	0.980	E	0.734	0.980	E	0.734	
37	Carlton Drive-Gate 7-7A Pincay Drive <sup>d</sup>	AM	0.310	A	0.319	A	0.463	A	0.144	0.463	A	0.144	0.507	A	0.188	0.507	A	0.188
	PM	0.332	A	0.339	A	0.421	A	0.082	0.421	A	0.082	0.539	A	0.200	0.539	A	0.200	
	SAT	0.306	A	0.312	A	0.426	A	0.114	0.426	A	0.114	0.562	A	0.250	0.562	A	0.250	
38	Doty Avenue-Gate 4/ Century Boulevard <sup>d</sup>	AM	0.410	A	0.424	A	0.513	A	0.089	0.513	A	0.089	0.578	A	0.154	0.478	A	0.054
	PM	0.590	A	0.608	B	0.758	C	0.150	0.758	C	0.150	0.964	E	0.356	0.864	D	0.256	
	SAT	0.650	B	0.662	B	0.796	C	0.134	0.796	C	0.134	<b>1.085</b>	<b>F</b>	<b>0.423</b>	<b>0.985</b>	<b>E</b>	<b>0.323</b>	
39	Yukon Avenue-Gate 5/ Century Boulevard <sup>d</sup>	AM	0.408	A	0.424	A	0.625	B	0.201	0.625	B	0.201	0.691	B	0.267	0.591	A	0.167
	PM	0.719	C	0.751	C	0.843	D	0.092	0.843	D	0.092	<b>1.065</b>	<b>F</b>	<b>0.314</b>	<b>0.965</b>	<b>E</b>	<b>0.214</b>	
	SAT	0.678	B	0.708	C	0.828	D	0.120	0.828	D	0.120	<b>1.097</b>	<b>F</b>	<b>0.389</b>	<b>0.997</b>	<b>E</b>	<b>0.289</b>	
40	Club Drive/ Century Boulevard <sup>d</sup>	AM	0.494	A	0.515	A	0.551	A	0.036	0.551	A	0.036	0.617	B	0.102	0.517	A	0.002
	PM	0.641	B	0.670	B	0.738	C	0.068	0.738	C	0.068	0.943	E	0.273	0.843	D	0.173	
	SAT	0.670	B	0.699	B	0.752	C	0.053	0.752	C	0.053	<b>1.032</b>	<b>F</b>	<b>0.333</b>	<b>0.932</b>	<b>E</b>	<b>0.233</b>	

**Table IV.L-2 (Continued)**  
**Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
41	Crenshaw Boulevard/ Slauson Avenue <sup>b</sup>	AM	0.815	D	0.852	D	0.851	D	-0.001	0.851	D	-0.001	1.025	F	0.173	0.955	E	0.103
	PM	0.769	C	0.803	D	0.824	D	0.021	0.824	D	0.021	<b>1.028</b>	<b>F</b>	<b>0.225</b>	<b>0.958</b>	<b>E</b>	<b>0.155</b>	
	SAT	0.965	E	1.010	F	1.003	F	-0.007	1.003	F	-0.007	1.202	F	0.192	1.132	F	0.122	
42	Crenshaw Boulevard/ Florence Avenue <sup>b</sup>	AM	0.784	C	0.820	D	0.832	D	0.012	0.832	D	0.012	0.909	E	0.089	0.839	D	0.019
	PM	0.750	C	0.784	C	0.802	D	0.018	0.802	D	0.018	0.930	E	0.146	0.860	D	0.076	
	SAT	0.790	C	0.826	D	0.827	D	0.001	0.827	D	0.001	<b>1.021</b>	<b>F</b>	<b>0.195</b>	<b>0.951</b>	<b>E</b>	<b>0.125</b>	
43	Crenshaw Boulevard/ 82nd Street-Crenshaw Drive <sup>d</sup>	AM	0.548	A	0.569	A	0.584	A	0.015	0.584	A	0.015	0.614	B	0.045	0.614	B	0.045
	PM	0.507	A	0.525	A	0.518	A	-0.007	0.518	A	-0.007	0.602	B	0.077	0.602	B	0.077	
	SAT	0.501	A	0.520	A	0.556	A	0.036	0.556	A	0.036	0.666	B	0.146	0.666	B	0.146	
44	Crenshaw Boulevard/ 8th Avenue <sup>d</sup>	AM	0.572	A	0.597	A	0.611	B	0.014	0.611	B	0.014	0.628	B	0.031	0.628	B	0.031
	PM	0.471	A	0.490	A	0.498	A	0.008	0.498	A	0.008	0.552	A	0.062	0.552	A	0.062	
	SAT	0.482	A	0.501	A	0.529	A	0.028	0.529	A	0.028	0.603	B	0.102	0.603	B	0.102	
45	Crenshaw Boulevard/ Manchester Boulevard <sup>d</sup>	AM	0.719	C	0.751	C	0.780	C	0.029	0.680	B	-0.071	0.729	C	-0.022	0.729	C	-0.022
	PM	0.947	E	0.991	E	<b>1.015</b>	<b>F</b>	<b>0.024</b>	<b>0.915</b>	<b>E</b>	<b>-0.076</b>	1.147	F	0.156	1.147	F	0.156	
	SAT	0.964	E	1.009	F	<b>1.046</b>	<b>F</b>	<b>0.037</b>	<b>0.946</b>	<b>E</b>	<b>-0.063</b>	1.231	F	0.222	1.231	F	0.222	
46	Crenshaw Boulevard/ Pincay Drive-90th Street <sup>d</sup>	AM	0.646	B	0.675	B	0.721	C	0.046	0.721	C	0.046	0.801	D	0.126	0.701	C	0.026
	PM	0.728	C	0.760	C	0.759	C	-0.001	0.759	C	-0.001	1.001	F	0.241	0.901	E	0.141	
	SAT	0.689	B	0.720	C	0.779	C	0.059	0.779	C	0.059	<b>1.135</b>	<b>F</b>	<b>0.415</b>	<b>0.911</b>	<b>E</b>	<b>0.191</b>	
47	Crenshaw Boulevard/ Century Boulevard <sup>d</sup>	AM	0.776	C	0.811	D	0.902	E	0.091	0.802	D	-0.009	0.929	E	0.118	0.632	B	-0.179
	PM	1.004	F	1.051	F	1.065	F	0.014	0.965	E	-0.086	1.381	F	0.330	0.897	D	-0.154	
	SAT	0.991	E	1.038	F	<b>1.155</b>	<b>F</b>	<b>0.117</b>	<b>1.055</b>	<b>F</b>	<b>0.017</b>	<b>1.677</b>	<b>F</b>	<b>0.639</b>	<b>1.034</b>	<b>F</b>	<b>-0.004</b>	
48	Crenshaw Boulevard/ Imperial Highway <sup>d</sup>	AM	0.806	D	0.842	D	0.864	D	0.022	0.864	D	0.022	0.913	E	0.071	0.813	D	-0.029
	PM	0.844	D	0.882	D	0.887	D	0.005	0.887	D	0.005	<b>1.068</b>	<b>F</b>	<b>0.186</b>	<b>0.968</b>	<b>E</b>	<b>0.086</b>	
	SAT	0.736	C	0.769	C	0.776	C	0.007	0.776	C	0.007	0.999	E	0.230	0.899	D	0.130	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
49	Crenshaw Boulevard/ Shopping Center Driveway (s/o Imperial Highway) <sup>d</sup>	AM	0.390	A	0.405	A	0.426	A	0.021	0.426	A	0.021	0.445	A	0.040	0.445	A	0.040
	PM	0.477	A	0.496	A	0.526	A	0.030	0.526	A	0.030	0.594	A	0.098	0.594	A	0.098	
	SAT	0.474	A	0.493	A	0.477	A	-0.016	0.477	A	-0.016	0.571	A	0.078	0.571	A	0.078	
50	Crenshaw Boulevard/ 116th Street <sup>d</sup>	AM	0.543	A	0.566	A	0.588	A	0.022	0.588	A	0.022	0.607	B	0.041	0.607	B	0.041
	PM	0.570	A	0.594	A	0.597	A	0.003	0.597	A	0.003	0.665	B	0.071	0.665	B	0.071	
	SAT	0.643	B	0.671	B	0.692	B	0.021	0.692	B	0.021	0.780	C	0.109	0.780	C	0.109	
51	Crenshaw Boulevard/ 118th Place-I-105 Freeway WB Ramps <sup>d</sup>	AM	0.739	C	0.772	C	0.794	C	0.022	0.794	C	0.022	0.823	D	0.051	0.823	D	0.051
	PM	0.763	C	0.798	C	0.761	C	-0.037	0.761	C	-0.037	0.857	D	0.059	0.857	D	0.059	
	SAT	0.720	C	0.753	C	0.763	C	0.010	0.763	C	0.010	0.883	D	0.130	0.883	D	0.130	
52	I-105 Freeway EB Ramps/ 120th Street <sup>e</sup>	AM	0.908	E	0.950	E	0.963	E	0.013	0.963	E	0.013	0.976	E	0.026	0.976	E	0.026
	PM	0.759	C	0.794	C	0.693	B	-0.101	0.693	B	-0.101	0.730	C	-0.064	0.730	C	-0.064	
	SAT	0.676	B	0.706	C	0.719	C	0.013	0.719	C	0.013	0.764	C	0.058	0.764	C	0.058	
53	Crenshaw Boulevard/ 120th Street <sup>e</sup>	AM	0.796	C	0.832	D	0.867	D	0.035	0.867	D	0.035	0.889	D	0.057	0.889	D	0.057
	PM	0.723	C	0.755	C	0.743	C	-0.012	0.743	C	-0.012	0.792	C	0.037	0.792	C	0.037	
	SAT	0.795	C	0.831	D	0.858	D	0.027	0.858	D	0.027	0.971	E	0.140	0.971	E	0.140	
54	Western Avenue/ Manchester Avenue <sup>b</sup>	AM	0.781	C	0.817	D	0.829	D	0.012	0.829	D	0.012	0.909	E	0.092	0.909	E	0.092
	PM	0.775	C	0.810	D	0.778	C	-0.032	0.778	C	-0.032	0.910	E	0.100	0.910	E	0.100	
	SAT	0.778	C	0.813	D	0.840	D	0.027	0.840	D	0.027	0.989	E	0.176	0.989	E	0.176	
55	Western Avenue/ Century Boulevard <sup>b</sup>	AM	0.760	C	0.794	C	0.816	D	0.022	0.816	D	0.022	0.908	E	0.114	0.838	D	0.044
	PM	0.778	C	0.814	D	0.865	D	0.051	0.865	D	0.051	<b>1.024</b>	<b>F</b>	<b>0.210</b>	<b>0.954</b>	<b>E</b>	<b>0.140</b>	
	SAT	0.692	B	0.723	C	0.761	C	0.038	0.761	C	0.038	0.954	E	0.231	0.884	D	0.161	
56	Vermont Avenue/ Manchester Avenue <sup>b</sup>	AM	0.864	D	0.903	E	0.914	E	0.011	0.914	E	0.011	<b>1.056</b>	<b>F</b>	<b>0.153</b>	<b>0.903</b>	<b>E</b>	<b>0.000</b>
	PM	0.919	E	0.962	E	0.983	E	0.021	0.983	E	0.021	<b>1.171</b>	<b>F</b>	<b>0.209</b>	<b>0.981</b>	<b>E</b>	<b>0.019</b>	
	SAT	0.674	B	0.704	C	0.733	C	0.029	0.733	C	0.029	0.867	D	0.163	0.620	B	-0.084	



**Table IV.L-2 (Continued)**  
**Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour**

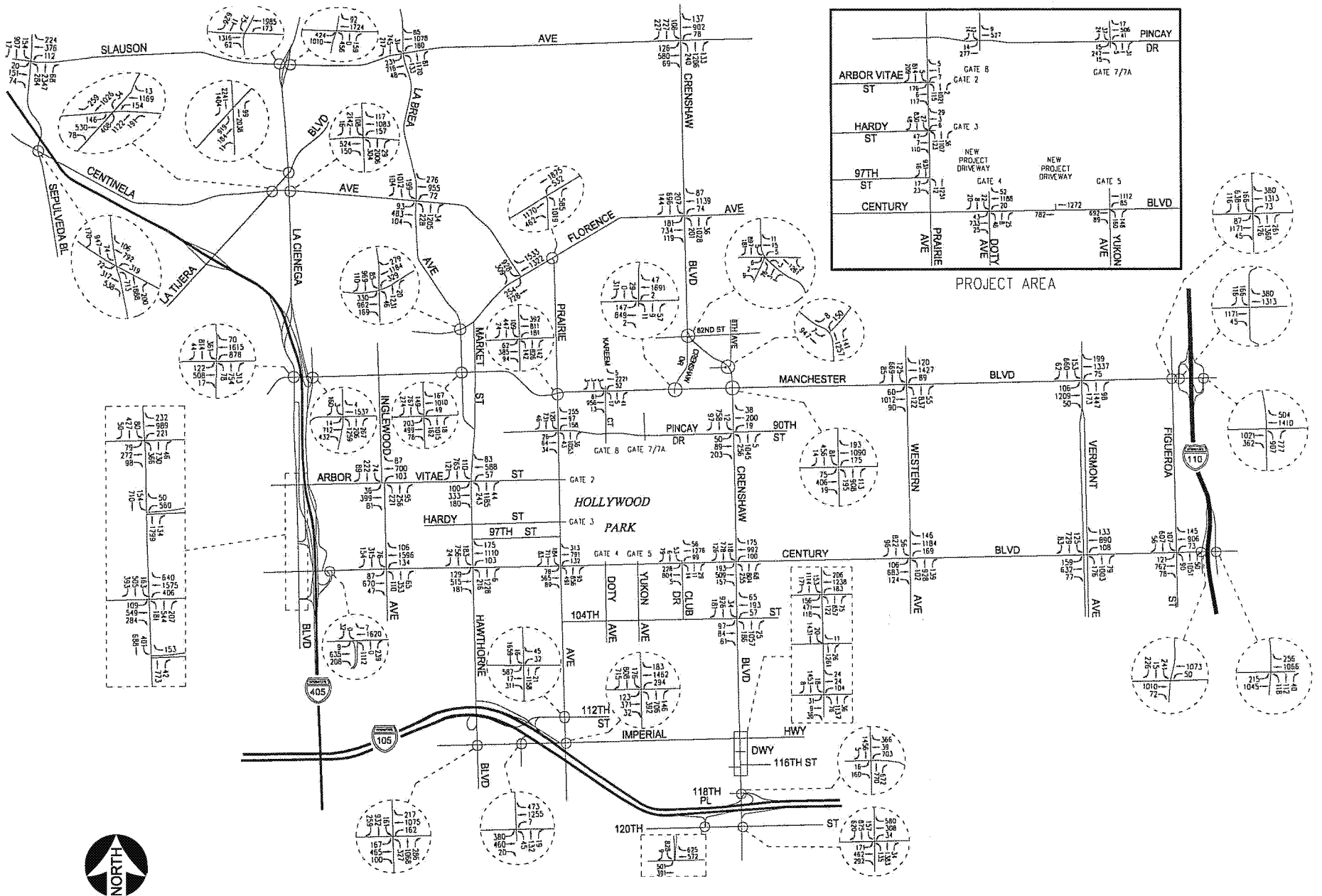
#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
57	Vermont Avenue/ Century Boulevard <sup>b</sup>	AM	0.652	B	0.681	B	0.694	B	0.013	0.694	B	0.013	0.771	C	0.090	0.771	C	0.090
	PM	0.691	B	0.721	C	0.705	C	-0.016	0.705	C	-0.016	0.861	D	0.140	0.861	D	0.140	
	SAT	0.623	B	0.650	B	0.669	B	0.019	0.669	B	0.019	0.827	D	0.177	0.827	D	0.177	
58	Figueroa Street/ Manchester Avenue <sup>b</sup>	AM	0.762	C	0.800	C	0.808	D	0.008	0.808	D	0.008	0.892	D	0.092	0.892	D	0.092
	PM	0.711	C	0.746	C	0.707	C	-0.039	0.707	C	-0.039	0.843	D	0.097	0.843	D	0.097	
	SAT	0.762	C	0.800	C	0.787	C	-0.013	0.787	C	-0.013	0.924	E	0.124	0.924	E	0.124	
59	I-110 Freeway SB Ramps/Manchester Avenue <sup>b</sup>	AM	0.631	B	0.662	B	0.669	B	0.007	0.669	B	0.007	0.699	B	0.037	0.699	B	0.037
	PM	0.549	A	0.576	A	0.555	A	-0.021	0.555	A	-0.021	0.670	B	0.094	0.670	B	0.094	
	SAT	0.519	A	0.544	A	0.562	A	0.018	0.562	A	0.018	0.663	B	0.119	0.663	B	0.119	
60	I-110 Freeway NB Ramps/Manchester Avenue <sup>b</sup>	AM	0.743	C	0.780	C	0.781	C	0.001	0.781	C	0.001	0.842	D	0.062	0.842	D	0.062
	PM	0.596	A	0.625	B	0.630	B	0.005	0.630	B	0.005	0.687	B	0.062	0.687	B	0.062	
	SAT	0.584	A	0.613	B	0.604	B	-0.009	0.604	B	-0.009	0.672	B	0.059	0.672	B	0.059	
61	Figueroa Street/ Century Boulevard <sup>b</sup>	AM	0.771	C	0.806	D	0.814	D	0.008	0.814	D	0.008	0.891	D	0.085	0.891	D	0.085
	PM	0.717	C	0.749	C	0.738	C	-0.011	0.738	C	-0.011	0.848	D	0.099	0.848	D	0.099	
	SAT	0.711	C	0.742	C	0.768	C	0.026	0.768	C	0.026	0.966	E	0.224	0.966	E	0.224	
62	I-110 Freeway SB Off Ramp-Grand Avenue/Century Boulevard <sup>b</sup>	AM	0.447	A	0.465	A	0.481	A	0.016	0.481	A	0.016	0.561	A	0.096	0.561	A	0.096
	PM	0.521	A	0.543	A	0.553	A	0.010	0.553	A	0.010	0.702	C	0.159	0.702	C	0.159	
	SAT	0.532	A	0.555	A	0.583	A	0.028	0.583	A	0.028	0.769	C	0.214	0.769	C	0.214	
63	I-110 Freeway NB On Ramp-Olive Street/Century Boulevard <sup>b</sup>	AM	0.569	A	0.593	A	0.608	B	0.015	0.608	B	0.015	0.688	B	0.095	0.688	B	0.095
	PM	0.487	A	0.507	A	0.523	A	0.016	0.523	A	0.016	0.695	B	0.188	0.695	B	0.188	
	SAT	0.575	A	0.600	A	0.635	B	0.035	0.635	B	0.035	0.854	D	0.254	0.854	D	0.254	
64	Crenshaw Boulevard/ 104th Street <sup>d</sup>	AM	0.674	B	0.704	C	0.730	C	0.026	0.730	C	0.026	0.750	C	0.046	0.750	C	0.046
	PM	0.645	B	0.674	B	0.696	B	0.022	0.696	B	0.022	0.775	C	0.101	0.775	C	0.101	
	SAT	0.575	A	0.600	A	0.628	B	0.028	0.628	B	0.028	0.731	C	0.131	0.731	C	0.131	

**Table IV.L-2 (Continued)**

**Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
65	New Signalized Project Driveway/Century Boulevard <sup>b</sup>	AM	f	f	f	f	0.496	A	0.496	0.496	A	0.496	0.562	A	0.562	0.562	A	0.562
	PM	f	f	f	f	0.687	B	0.687	0.687	B	0.687	0.892	D	0.892	0.892	D	0.892	
	SAT	f	f	f	f	0.691	B	0.691	0.691	B	0.691	0.980	E	0.980	0.980	E	0.980	
66	Prairie Avenue/97 <sup>th</sup> Street <sup>d</sup>	AM	0.371	A	0.385	A	0.432	A	0.047	0.432	A	0.047	0.453	A	0.068	0.453	A	0.068
	PM	0.487	A	0.507	A	0.528	A	0.021	0.528	A	0.021	0.608	B	0.101	0.608	B	0.101	
	SAT	0.449	A	0.467	A	0.538	A	0.071	0.538	A	0.071	0.634	B	0.167	0.634	B	0.167	

**Notes:**  
 Significant impacts are denoted with shaded cells and bold numbers.  
<sup>a</sup> City of Culver City Intersection.  
<sup>b</sup> City of Los Angeles Intersection.  
<sup>c</sup> County of Los Angeles Intersection.  
<sup>d</sup> City of Inglewood Intersection.  
<sup>e</sup> City of Hawthorne Intersection.  
<sup>f</sup> Future Intersection.  
 Source: Linscott, Law and Greenspan Engineers, August 1, 2008.

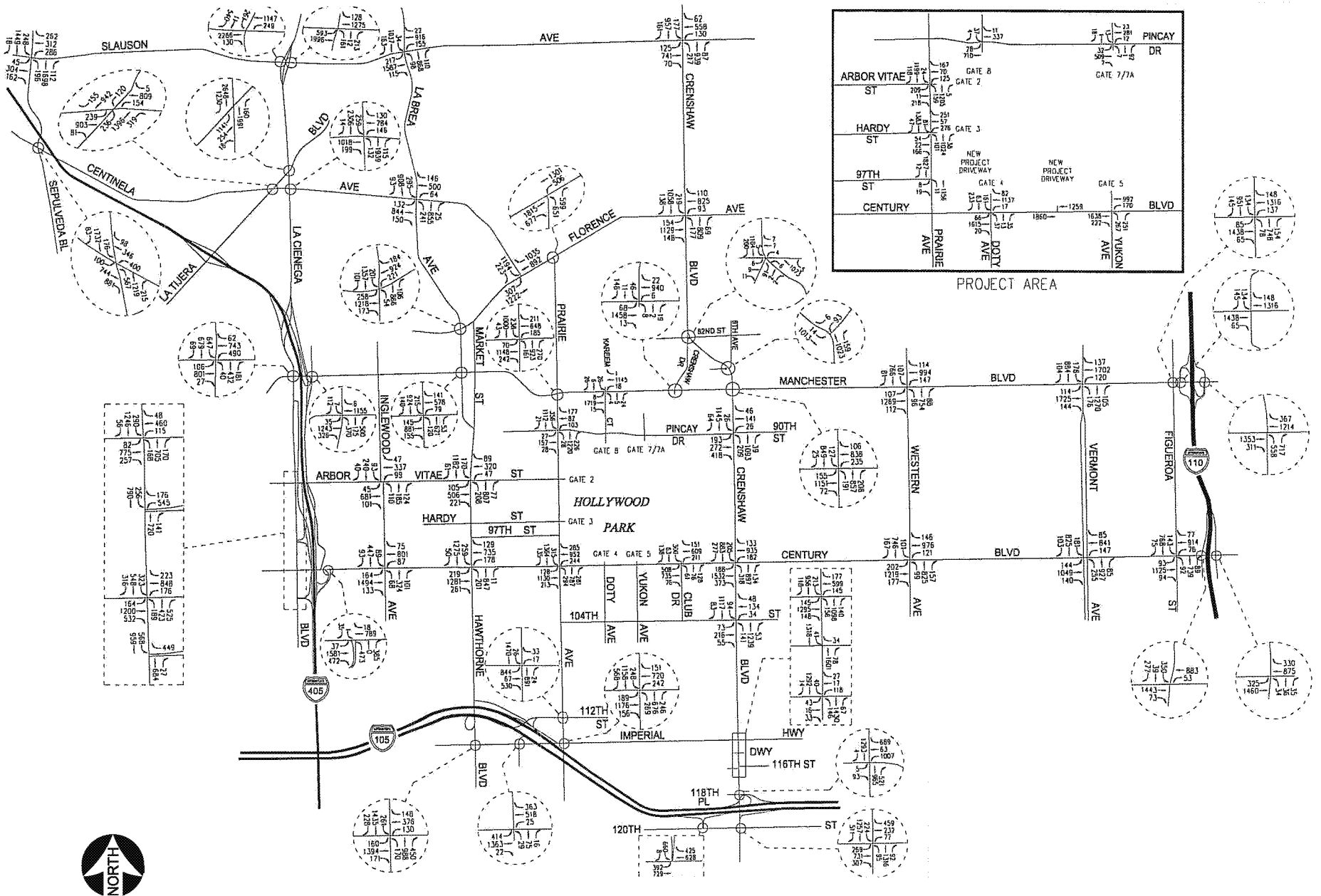


Source: Linscott, Law & Greenspan, August 1, 2008.



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**Figure IV.L-13**  
 Existing With Ambient Growth Traffic Volumes  
 Weekday AM Peak Hour



Source: Linscott, Law & Greenspan, August 1, 2008



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Figure IV.L-14  
Existing With Ambient Growth Traffic Volumes  
Weekday PM Peak Hour

### **Saturday Existing With Ambient Growth Conditions**

As shown in Table IV.L-2, five of the 65 existing study intersections are expected to operate at LOS E or worse during the Saturday mid-day peak hour with the addition of ambient growth traffic through year 2014. The remaining 60 existing study intersections are expected to continue to operate at LOS D or better during the Saturday mid-day peak hour. The existing with ambient growth traffic volumes at the study intersections during the Saturday mid-day peak hour are displayed in Figure IV.L-15.

### **Proposed Project Site Access and Circulation**

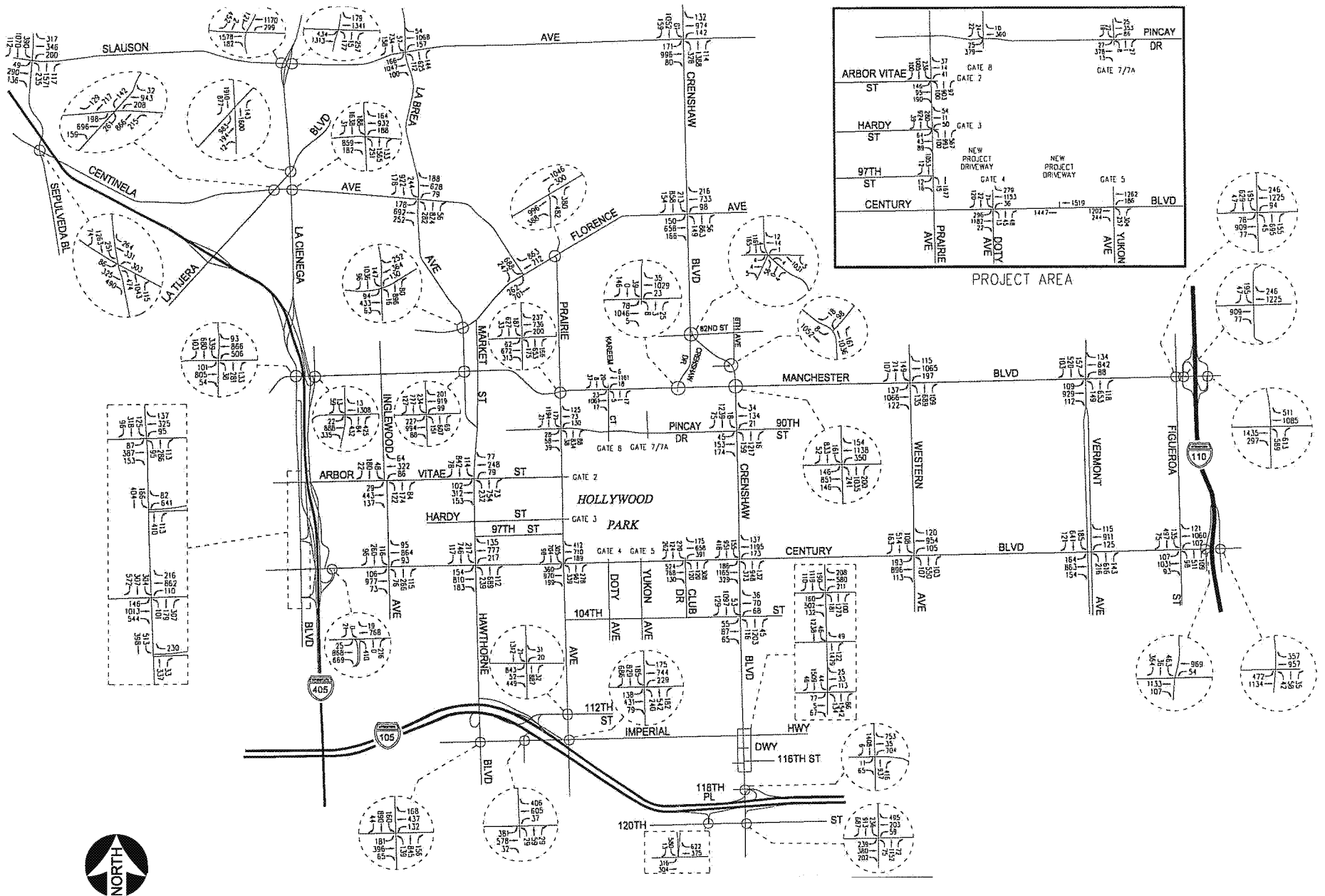
Primary vehicular access to the proposed project will be provided via the five existing signalized access points described above, plus two proposed signalized access points: one on Century Boulevard east of Gate 4/Doty Avenue and one on Prairie Avenue across from 97<sup>th</sup> Street. A brief description of the proposed project primary site access scheme and project design features to adequately serve the project site access are provided in the following paragraphs. This Traffic Impact Study assumes implementation of all of the Proposed Project's on-site and off-site roadway design features described herein as part of the project analysis conditions.

#### ***Prairie Avenue at Arbor Vitae Street:***

This access point is located on the east side of Prairie Avenue, opposite Arbor Vitae Street, at the northwest corner of the project site. The roadway which will essentially function as an extension of Arbor Vitae Street will be 57 feet (curb-to-curb) in width in the vicinity of Prairie Avenue and will be constructed to City of Inglewood standards. The Arbor Vitae Street extension into the site will primarily provide vehicular access to the residential and civic use components of the project.

**Project On-Site Design Features** – This roadway will provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach to the Prairie Avenue/Arbor Vitae Street intersection. The existing traffic signal equipment at the Prairie Avenue/Arbor Vitae Street intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Prairie Avenue, the northbound approach of the Prairie Avenue/Arbor Vitae Street intersection shall be widened along the east side of Prairie Avenue to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane.

**Project Off-Site Design Features** – The eastbound Arbor Vitae Street approach shall be restriped within the existing pavement width to provide one left-turn lane and one shared through/right-turn lane so as to properly align with the project access road.



Source: Linscott, Law & Greenspan, August 1, 2008



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**Figure IV.L-15**  
Existing With Ambient Growth Traffic Volumes  
Saturday Mid-Day Peak Hour

***Prairie Avenue at Hardy Street:***

This access point is located on the east side of Prairie Avenue, opposite Hardy Street. The roadway which will essentially function as an extension of Hardy Street will be 68 feet (curb-to-curb) in width in the vicinity of Prairie Avenue and will be constructed to City of Inglewood standards. The Hardy Street extension into the site will primarily provide vehicular access to the retail, civic use, and some residential components of the project.

**Project On-Site Design Features** – This roadway will provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach to the Prairie Avenue/Hardy Street intersection. The existing traffic signal equipment at the Prairie Avenue/Hardy Street intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Prairie Avenue, the northbound approach of the Prairie Avenue/Hardy Street intersection shall be widened along the east side of Prairie Avenue to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane.

**Project Off-Site Design Features** – The eastbound Hardy Street approach shall be widened and improved within the existing right-of-way along both sides of Hardy Street and restriped to provide one left-turn lane and one shared through/right-turn lane so as to properly align with the project access road.

***Prairie Avenue at 97th Street:***

This access point is located on the east side of Prairie Avenue, opposite 97<sup>th</sup> Street. The roadway which will essentially function as an extension of 97<sup>th</sup> Street will be 40 feet (curb-to-curb) in width in the vicinity of Prairie Avenue and will be constructed to City of Inglewood standards. The 97<sup>th</sup> Street extension into the site will primarily provide vehicular access to the retail component of the project and is proposed to be signalized.

**Project On-Site Design Features** – This roadway will provide one left-turn lane and one shared through/right-turn lane on the westbound approach to the Prairie Avenue/97<sup>th</sup> Street intersection. A traffic signal shall be installed at this location to accommodate 97<sup>th</sup> Street and the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Prairie Avenue, the northbound approach of the Prairie Avenue/97<sup>th</sup> Street intersection shall be widened along the east side of Prairie Avenue to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane.

**Project Off-Site Design Features** – The eastbound 97<sup>th</sup> Street approach shall be widened and improved within the existing right-of-way along and restriped to provide one left-turn lane and one shared through/right-turn lane so as to properly align with the project access road.

***Century Boulevard at Doty Avenue:***

This access point is located on the north side of Century Boulevard, opposite Doty Avenue. The roadway which will essentially function as an extension of Doty Avenue will be 68 feet (curb-to-curb) in width in the vicinity of Century Boulevard and will be constructed to City of Inglewood standards. The Doty Avenue extension into the site will primarily provide vehicular access to the retail component of the project. Some traffic associated with the casino component of the project will also utilize this driveway.

**Project On-Site Design Features** – This roadway will provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach to the Doty Avenue/Century Boulevard intersection. The existing traffic signal equipment at the Doty Avenue/Century Boulevard intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Century Boulevard, the westbound approach of the Doty Avenue/Century Boulevard intersection shall be widened along the north side of Century Boulevard to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane.

**Project Off-Site Design Features** – The northbound Doty Avenue approach shall be restriped within the existing pavement width to provide one left-turn lane and one shared through/right-turn lane so as to properly align with the project access road.

***Century Boulevard at Proposed Signalized Driveway (east of Doty Avenue):***

This access point is located on the north side of Century Boulevard, approximately 600 feet east of Doty Avenue. The roadway is proposed to be a private roadway and will be 57 feet (curb-to-curb) in width. The proposed signalized driveway will primarily provide vehicular access to the casino component of the project.

**Project On-Site Design Features** – This roadway will provide one left-turn lane and one right-turn only lane on the southbound approach to the Century Boulevard intersection. A traffic signal shall be installed at this location to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Century Boulevard, the westbound approach of this intersection shall be widened along the north side of Century Boulevard to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be three through lanes and one right-turn only lane.

***Century Boulevard at Yukon Avenue:***

This access point is located on the north side of Century Boulevard, opposite Yukon Avenue. The roadway which will essentially function as an extension of Yukon Avenue will be 60 feet (curb-to-curb) in width and will be constructed to City of Inglewood standards. The Yukon Avenue extension into the site will primarily provide vehicular access to the hotel and residential components of the project. Some traffic associated with the retail component of the project is also anticipated to utilize this driveway.



**Project On-Site Design Features** – This roadway will provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach to the Yukon Avenue/Century Boulevard intersection. The existing traffic signal equipment at the Yukon Avenue/Century Boulevard intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Century Boulevard, the westbound approach of the Yukon Avenue/Century Boulevard intersection shall be widened along the north side of Century Boulevard to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane.

**Project Off-Site Design Features** - The northbound Yukon Avenue approach shall be restriped within the existing pavement width to provide one left-turn lane, one through lane, and one shared through/right-turn lane so as to properly align with the project access road.

***Pincay Drive at Carlton Drive:***

This access point is located on the south side of Pincay Drive, opposite Carlton Drive. The roadway which will essentially function as an extension of Carlton Drive will be 26 feet (curb-to-curb) in width due to existing right-of-way/easement constraints. The Carlton Drive extension into the site will primarily provide vehicular access to the residential component of the project.

**Project Off-Site Design Features** – This roadway will provide one shared left-turn/through/right-turn lane on the northbound approach to the Carlton Drive/Pincay Drive intersection. The existing traffic signal equipment at the Carlton Drive/Pincay Drive intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection.

***Private Secondary Driveways (along Century Boulevard and Prairie Avenue)***

In addition to the primary access points described above, secondary driveways would be provided to facilitate project traffic access to and from the project site. A minimum of one driveway but no more than three driveways should be provided at each of the following locations as part of the proposed project:

- North side of Century Boulevard east of Yukon Avenue (to serve the retail use)
- North side of Century Boulevard between the proposed signalized driveway and Yukon Avenue (to serve the hotel and retail uses)
- North side of Century Boulevard between Prairie Avenue and Doty Avenue (to serve the retail use)
- East side of Prairie Avenue between 97<sup>th</sup> Street and Century Boulevard (to serve the retail use)
- East side of Prairie Avenue between Arbor Vitae Street and Hardy Street (to serve the residential use)

It should be noted that all of the proposed secondary access driveways are anticipated to be limited to right-turn ingress and egress turning movement only operations. Further, the Traffic Impact Study assumes a minimum of one secondary access driveway is provided at each of the above locations, however, providing two or three driveways at these locations will not change the overall results of this study. It is further noted that minor driveways may also be provided along Prairie Avenue and Century Boulevard in addition to the primary and secondary driveways to accommodate service vehicles.

### *Internal Circulation*

The Proposed Project is designed as a “smart growth” mixed-use infill development, designed to concentrate neighborhoods by bringing daily activities within walking distance of each other in an effort to reduce reliance on the private automobile, thereby reducing VMT. The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. The Project Site would contain a network of streets and paseos that connect the parks and plazas with retail, entertainment, residential, office and civic uses.

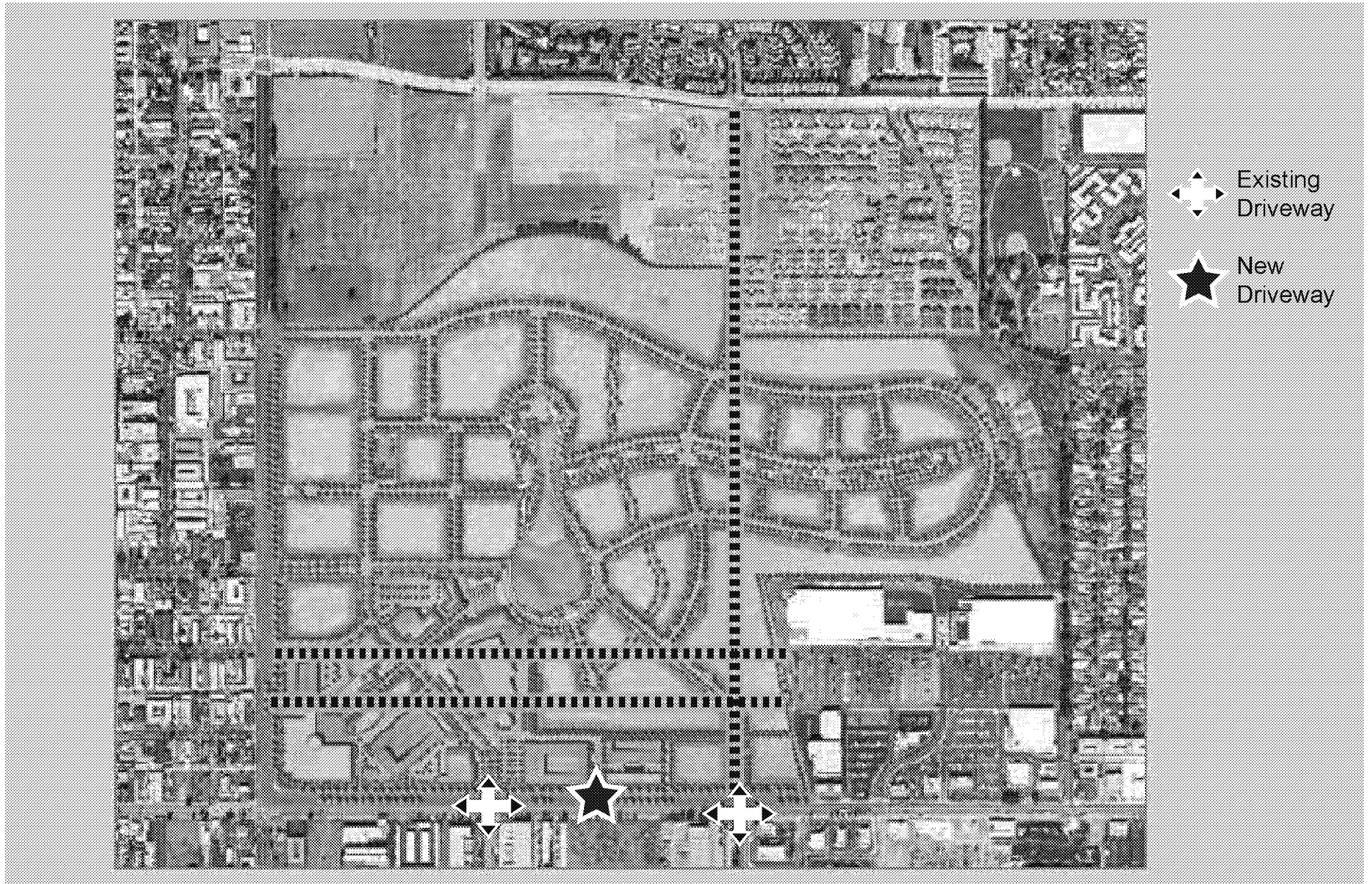
Alternative internal circulation plans were considered for the Proposed Project, including providing cut-through streets across the Project Site as depicted in Figures IV.L-16 and IV.L-17.

An internal circulation plan which included cut-through streets across the Project Site was determined to be unsuitable for the Project Site for several reasons. First, creating cut-through streets across the Project Site detracts from the walkability of the development and could lead to safety concerns resulting from pedestrians walking in the retail/entertainment area of the Project Site and vehicles cutting across the Project Site to quickly access areas adjacent to the Project Site. Also, the cut-through streets would not connect to the broader arterial street system, as shown in Figure IV.L-17. As a result, cut-through traffic could be released onto existing residential neighborhood streets upon exiting the Project Site. This could result in unanticipated secondary traffic impacts to neighboring residential streets. Given this, providing funding for ITS improvements (as provided in the Mitigation Measures in this Section) to improve the flow of traffic was determined to be a better alternative than creating cut-through streets across the Project Site. ITS synchronization could provide an improvement over baseline traffic conditions since it would help eliminate bottle necks and queues and would allow for a more efficient flow of traffic around the Project Site and through the City.

Moreover, as shown in Figure IV.L-18, within the Project Site, the design of the Proposed Project’s internal circulation plan allows the internal streets to operate at LOS A. Therefore, the internal circulation plan for the Project Site would result in a less than significant impact to traffic and circulation.

### *Additional On-Site Project Design Feature:*

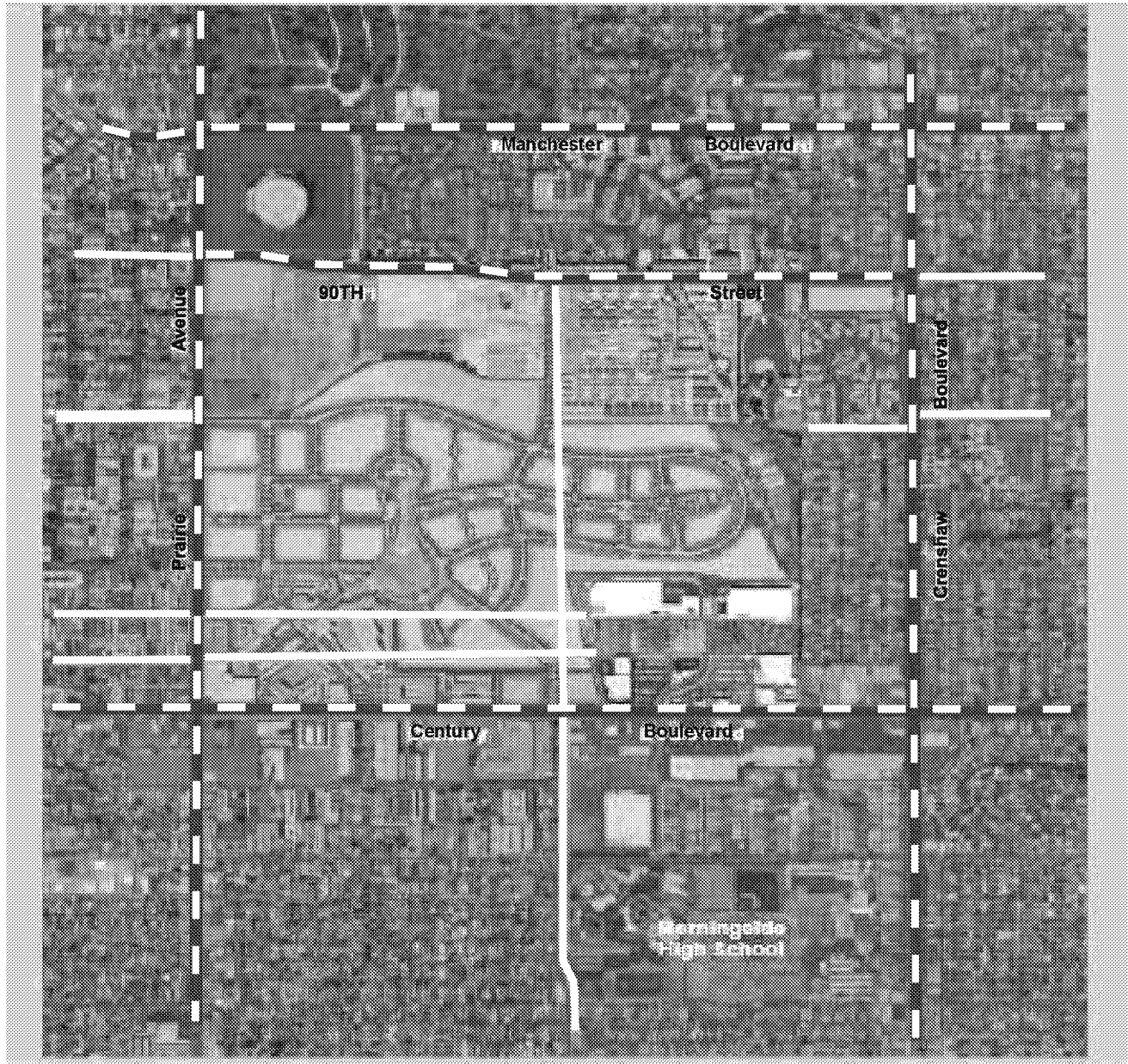
A voluntary improvement/project on-site design feature to provide additional vehicular capacity and to facilitate traffic flow at the key intersection of Prairie Avenue and Century Boulevard adjacent to the project is also proposed. The westbound approach of the Prairie Avenue/Century Boulevard intersection shall be widened along the north side of Century Boulevard to provide an exclusive right-turn lane. The



Existing Driveway  
 New Driveway



Source: Hollywood Park Land Company, August 2008.

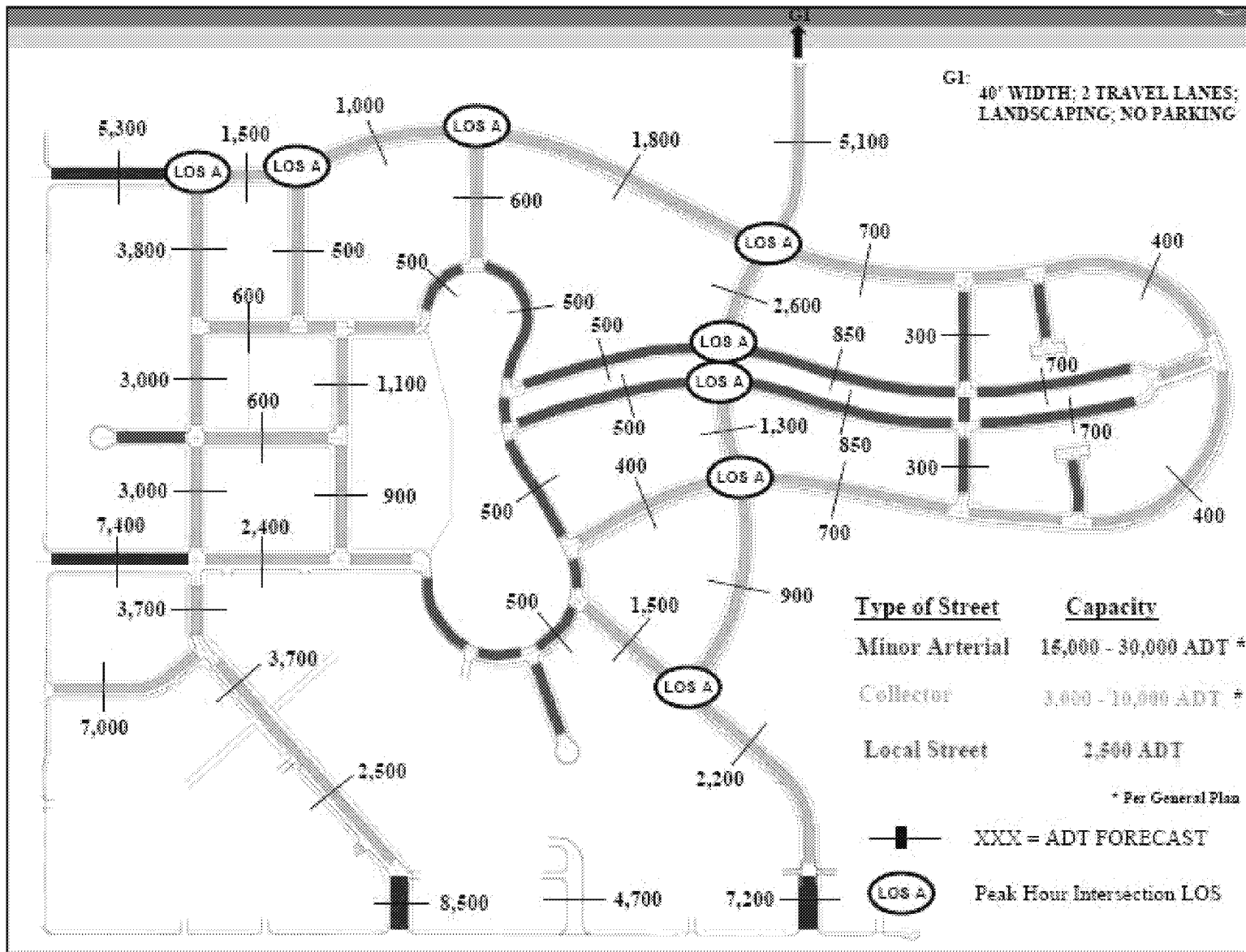


Source: Hollywood Park Land Company, August 2008.



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Figure IV.L-17  
Alternative Internal Circulation Plan  
In Context With Broad Arterial Street System



Source: Hollywood Park Land Company, August 2008.



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Figure IV.L-18  
Proposed Project's Internal Circulation Plan

traffic signal shall be modified to provide a westbound right-turn overlapping phase to be operated concurrently with the southbound left-turn phase. The recommended improvement will benefit existing and future traffic flow at this location by providing an exclusive right-turn only lane and an exclusive right-turn signal phase at the intersection. The resultant lane configurations on the westbound approach will be one left-turn lane, three through lanes, and one right-turn only lane.

### ***Transportation Demand Management Strategy***

As part of the proposed circulation plan, the Hollywood Park Specific Plan will incorporate a Transportation Demand Management (TDM) Strategy. The details and requirements of the TDM strategy for Hollywood Park will be finalized in conjunction with the project approval process and implemented as part of the Mitigation Monitoring Report and Program (MMRP). Some examples of the TDM strategy features that are proposed to be included in the project are as follows:

- (1) A kiosk or bulletin board providing information about ride sharing and public transportation;
- (2) Bicycle racks at a ratio of one (1) bicycle space for every 50,000 square feet of non-residential development plus an additional three (3) bicycle spaces (developments under 50,000 square feet are exempt from this requirement);
- (3) Employee parking area and safe and convenient access from the employee parking area to all businesses;
- (4) Bus shelter improvements along Century Boulevard and Prairie Avenue adjacent to the project;
- (5) Preferential parking spaces for vanpools;
- (6) Sidewalks or other designated pathways following safe routes from the pedestrian circulation along Century Boulevard and Prairie Avenue to the bicycle parking facilities and into the development; and
- (7) Transportation/Parking Benefit Account (similar to flexible spending accounts) used by on-site employers to provide their employees the opportunity to benefit from tax advantages under the Internal Revenue Code for qualified parking, vanpooling and purchasing of transit passes.

### **Future With Proposed Project Conditions**

#### ***Weekday Future With Proposed Project Conditions***

As shown in Table IV.L-2, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the proposed project is expected to create a significant impact at five of the study intersections during the AM and/or PM peak hours. Incremental but not significant impacts are noted at the remaining 61 study intersections during the weekday AM and PM peak hours. The five study

intersections that are identified to be significantly impacted by the project during the weekday AM and/or the PM peak hours are as follows:

- Intersection No. 18: La Brea Avenue/Centinel Avenue
- Intersection No. 19: La Brea Avenue/Florence Avenue
- Intersection No. 22: La Brea Avenue/Century Boulevard
- Intersection No. 25: Prairie Avenue/Florence Avenue
- Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard

The future with project (existing, ambient growth and project) traffic volumes at the study intersections for the weekday AM and PM peak hours are displayed in Figures IV.L-19 and IV.L-20, respectively.

#### ***Saturday Future With Proposed Project Conditions***

As shown in Table IV.L-2, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the proposed project is expected to create a significant impact at two of the study intersections during the Saturday mid-day peak hour. As indicated in Table IV.L-2, incremental but not significant impacts are noted at the remaining 64 study intersections during the Saturday mid-day peak hour. The two study intersections that are identified to be significantly impacted by the project during the Saturday mid-day peak hour are as follows:

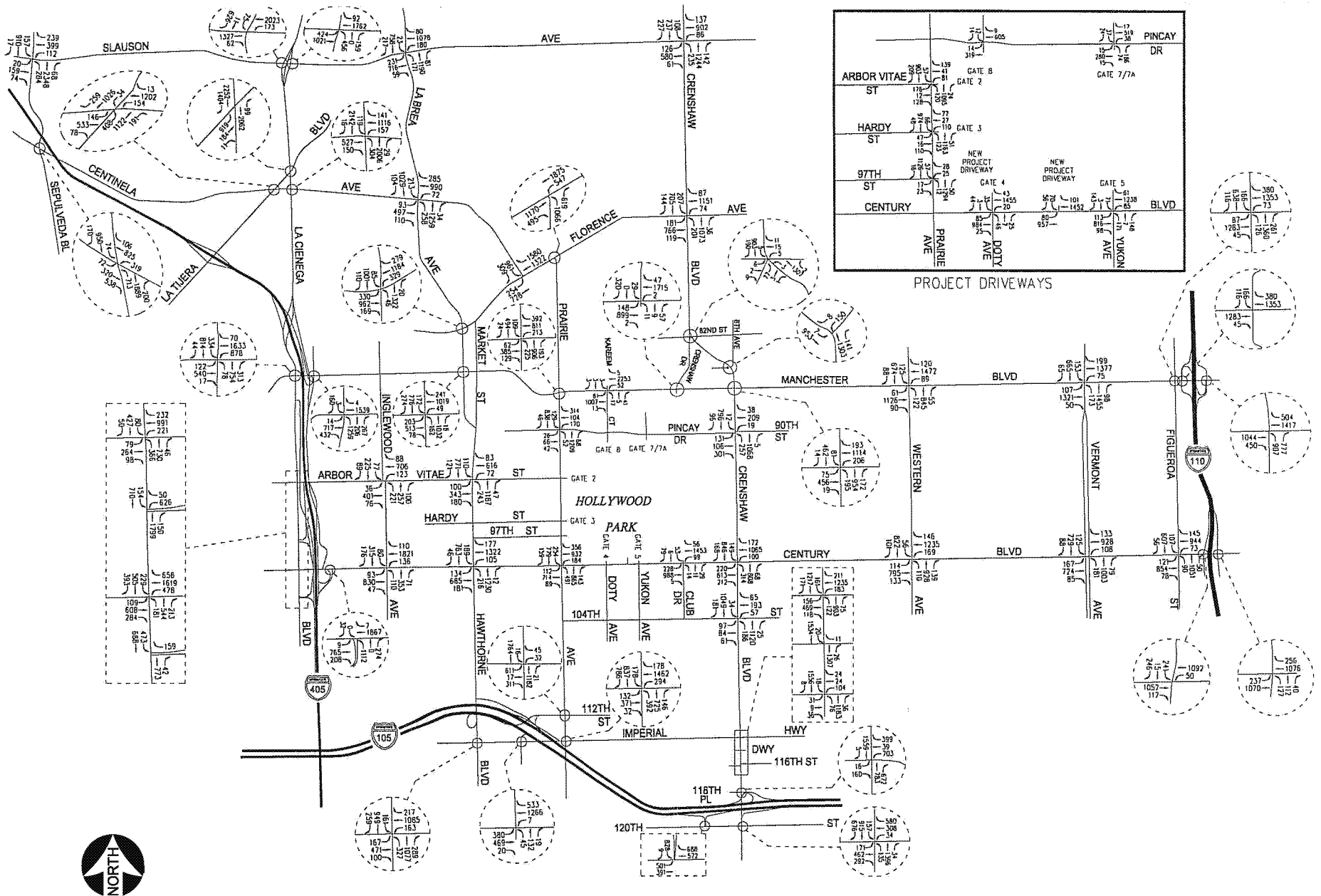
- Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard;
- Intersection No. 47: Crenshaw Boulevard/Century Boulevard

The future with project (existing, ambient growth and project) traffic volumes at the study intersections for the Saturday mid-day peak hour are displayed in Figure IV.L-21.

#### **Congestion Management Program Traffic Impact Assessment**

The Congestion Management Program (CMP) is a state-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system.

As required by the 2004 Congestion Management Program for Los Angeles County, a Traffic Impact Assessment (TIA) has been prepared to determine the potential impacts on designated monitoring locations on the CMP highway system. The analysis has been prepared in accordance with procedures outlined in the 2004 Congestion Management Program for Los Angeles County, County of Los Angeles Metropolitan Transportation Authority, July, 2004.



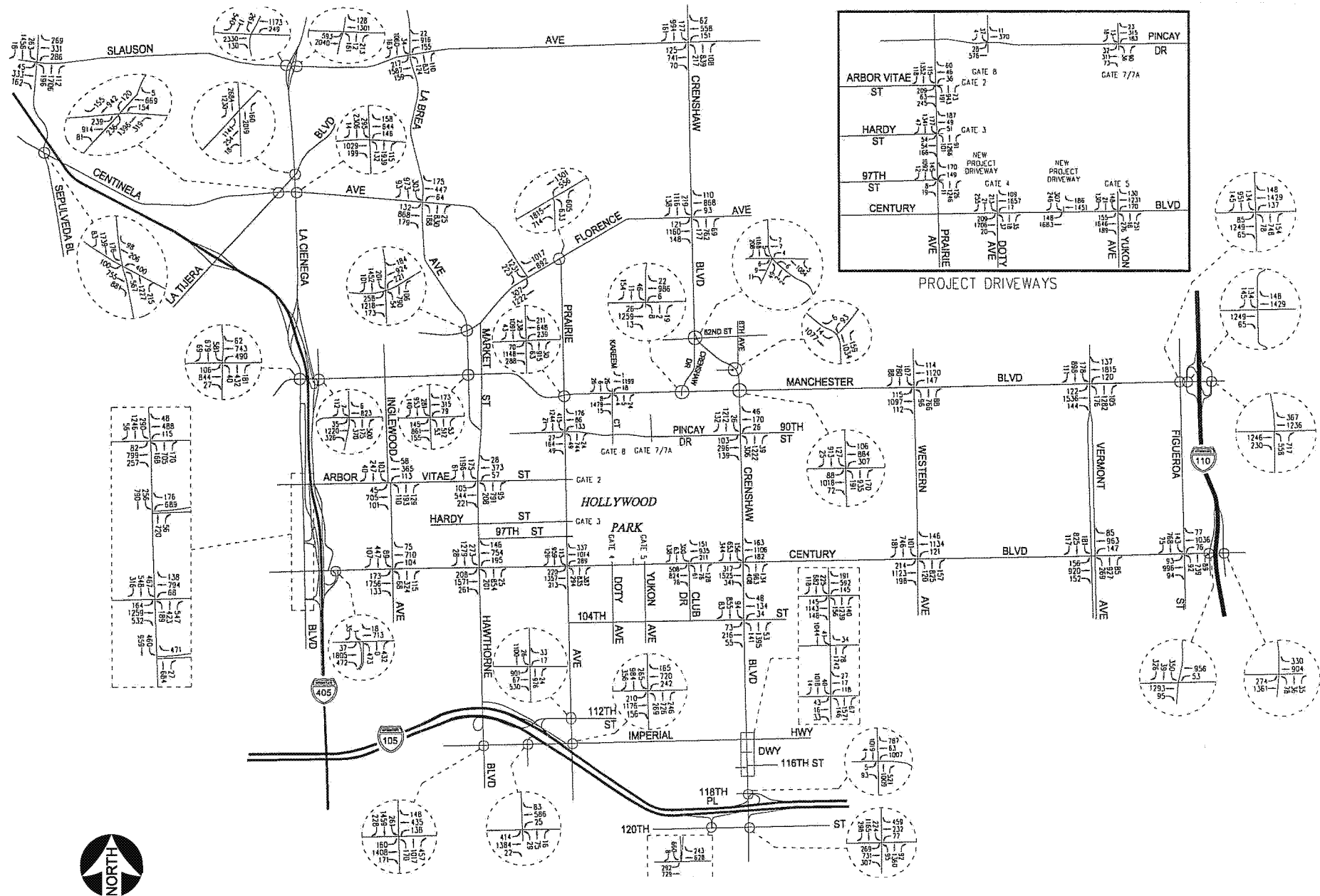
Source: Linscott, Law & Greenspan, August 1, 2008



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Figure IV.L-19  
Future with Project Traffic Volumes  
Weekday AM Peak Hour



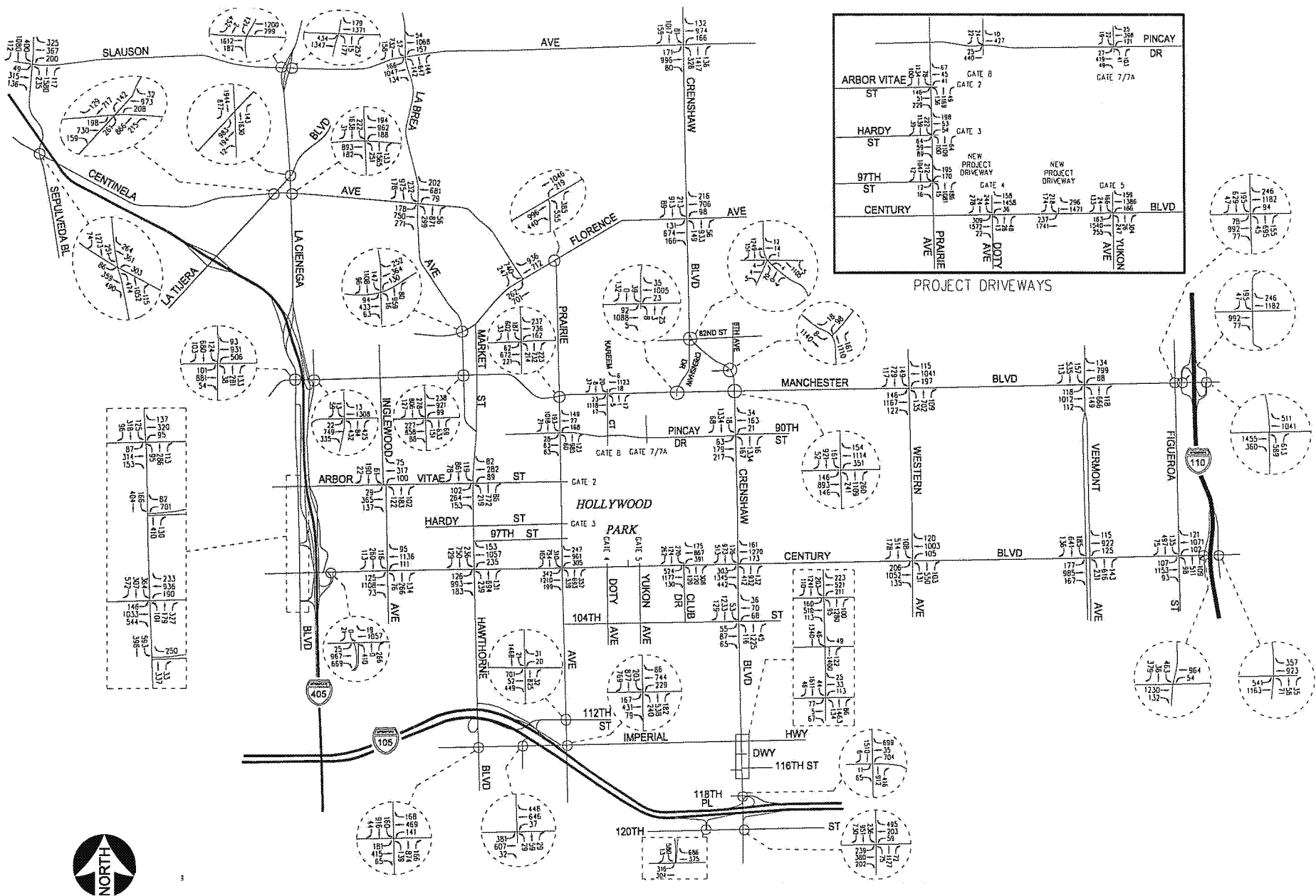


Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-20  
Future with Project Traffic Volumes  
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, August 1, 2008



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**Figure IV.L-21**  
Future with Project Traffic Volumes  
Saturday Mid-Day Peak Hour

According to Section B.9.1 of the 2004 CMP manual, the criteria for determining a significant impact is as follows:

“A significant transportation impact occurs when the proposed project increases traffic demand by 2% of capacity ( $V/C \geq 0.02$ ), causing or worsening LOS F ( $V/C > 1.00$ ).”

The CMP impact criteria apply for analysis of both intersection and freeway monitoring locations.

### *Intersections*

The following CMP intersection monitoring locations in the project vicinity have been identified:

<u>CMP Station</u>	<u>Intersection</u>
CMP Int. No. 24	Crenshaw Boulevard/Manchester Boulevard
CMP Int. No. 25	La Brea Avenue/Manchester Boulevard
CMP Int. No. 47	La Cienega Boulevard/Centinela Avenue
CMP Int. No. 53	Vermont Avenue/Manchester Avenue

The CMP TIA guidelines require that intersection monitoring locations must be examined if the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic) at CMP monitoring intersections, as stated in the CMP manual as the threshold criterion for a traffic impact assessment. The CMP intersection traffic impact assessment is summarized in Table IV.L-3. As shown, the proposed Hollywood Park Redevelopment Project will add 50 or more trips at the identified CMP intersections during the AM weekday peak hour. A review of potential impacts at the four CMP monitoring stations has been prepared.

**Table IV.L-3  
Congestion Management Plan Intersection Traffic Impact Assessment**

No.	Location	Peak Hour	Forecast Net New Project Trips	CMP Impact Assessment Threshold	Meets CMP Threshold for Impact Assessment? <sup>a</sup>
45	Crenshaw Boulevard/Manchester Avenue (CMP Monitoring Station No. 24)	AM	216	50	YES
		PM	22	50	NO
20	La Brea Avenue/Manchester Boulevard (CMP Monitoring Station No. 25)	AM	146	50	YES
		PM	-332	50	NO
7	La Cienega Boulevard/Centinela Avenue (CMP Monitoring Station No. 47)	AM	71	50	YES
		PM	-65	50	NO
56	Vermont Avenue/Manchester Avenue (CMP Monitoring Station No. 53)	AM	169	50	YES
		PM	-35	50	NO

<sup>a</sup> A “yes” response indicates that the traffic volumes at the CMP location warrant a detailed assessment. It does not indicate that the volumes would result in a significant CMP Impact.

Based on procedures outlined in the “2004 Congestion Management Program for Los Angeles County,” County of Los Angeles Metropolitan Transportation Authority, July 2004.

Source: Linscott, Law and Greenspan, Revised Traffic Impact Study, August 1, 2008.

The review of potential impacts at the four CMP monitoring stations is based on the overall analysis prepared for the proposed project, since the City of Inglewood traffic impact criteria is consistent with the CMP. Based on the traffic impact analysis summarized in Table IV.L-2, CMP Station 24: Crenshaw Boulevard/Manchester Boulevard (also referred to as study intersection No. 45) is expected to be impacted by the proposed project. The other three intersections that trigger the threshold for analysis will not be significantly impacted by the Proposed Project. Funding the installation of ITS traffic signal program has been proposed as the mitigation measure for the impacted intersection. As shown in Table IV.L-2, the mitigation measure is expected to reduce the projected impacts to less than significant levels at this CMP monitoring station.

### Freeways

The following CMP freeway monitoring locations in the project vicinity have been identified:

<u>CMP Station</u>	<u>Location</u>
1042	I-105 Freeway c/o Crenshaw Boulevard, w/o Vermont Avenue
1046	I-110 Freeway at Manchester Avenue
1069	I-405 Freeway n/o La Tijera Boulevard

The CMP TIA guidelines require that freeway monitoring locations must be examined if the proposed project will add 150 or more trips (in either direction) during either the weekday AM or PM peak hours. The CMP freeway traffic impact assessment is summarized in Table IV.L-4.

**Table IV.L-4**  
**Congestion Management Plan Freeway Traffic Impact Assessment**

<b>CMP Station</b>	<b>Location</b>	<b>Peak Hour</b>	<b>Direction</b>	<b>Forecast Net New Project Trips</b>	<b>CMP Impact Assessment Threshold</b>	<b>Meets CMP Threshold for Impact Assessment?<sup>a</sup></b>
1042	I-105 Freeway east of Crenshaw Boulevard, west of Vermont (R 5.50)	AM	EB	123	150	NO
			WB	43	150	NO
		PM	EB	-562	150	NO
			WB	119	150	NO
1046	I-110 Freeway at Manchester Avenue (PM 15.86)	AM	NB	117	150	NO
			SB	20	150	NO
		PM	NB	35	150	NO
			SB	49	150	NO
1069	I-405 Freeway n/o La Tijera Boulevard (PM 24.27)	AM	NB	94	150	NO
			SB	42	150	NO
		PM	NB	-170	150	NO
			SB	92	150	NO

<sup>a</sup> A "yes" response indicates that the traffic volumes at the CMP location warrant a detailed assessment. It does not indicate that the volumes would result in a significant CMP Impact.

Based on procedures outlined in the "2004 Congestion Management Program for Los Angeles County," County of Los Angeles Metropolitan Transportation Authority, July 2004.

Source: Linscott, Law and Greenspan, Revised Traffic Impact Study, August 1, 2008.

As shown in Table IV.L-4, the proposed Hollywood Park Redevelopment Project will not add 150 or more trips (in either direction) during either the weekday AM or PM peak hours to the CMP freeway monitoring locations which is the threshold for preparing a traffic impact analysis, as stated in the CMP manual. Therefore, no further review of potential impacts to freeway monitoring locations which are part of the CMP highway system is required.

### *Transit*

As required by the 2004 Congestion Management Program for Los Angeles County, a review has been made of the CMP transit service. As previously discussed, existing transit service is provided in the vicinity of the proposed project.

The weekday project trip generation was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the proposed project is forecast to generate demand for 79 new transit trips (29 inbound trips and 50 outbound trips) during the weekday AM peak hour. During the PM peak hour, the proposed project is forecast to generate demand for nominal new transit trips (due to transit usage associated with the existing uses which will be removed). Over a 24-hour period, the proposed project is forecast to generate a demand for 844 new daily transit trips. The calculations are as follows:

- AM Peak Hour Trips =  $1,604 \times 1.4 \times 0.035 = 79$  Transit Trips
- Daily Trips =  $17,222 \times 1.4 \times 0.035 = 844$  Transit Trips

It is anticipated that the existing transit service in the project area will adequately accommodate the project generated transit trips. The Project Site vicinity is currently served by approximately 70 buses per hour during the AM peak hour. Thus, the project will generate on average one to two new boardings/alightings per bus in the AM peak hour. Therefore, given the number of transit trips generated by the project, the relatively high number of existing transit routes in the project vicinity, and the available transit ridership data, it is concluded that the public transit system will not be significantly impacted by the proposed project.

### **Construction Impacts**

#### *Construction Assumptions*

It is assumed that the Hollywood Park Project Site will have demolition and grading during the first year of construction. It is also assumed that after completion of the initial phase of construction, demolition and grading, final grading and structure construction would begin on the on the site and extend over a five-year period. It is estimated that the demolition would require the removal of approximately 200,000 tons of material from the site. Grading would be balanced on-site, thus the need to haul additional fill material to the site or to haul excess material off site would not be required. It is assumed that the

equipment staging area and construction worker parking during the initial phases of construction grading, as well as after the start of construction would occur on the Project Site.

#### ***Construction Traffic Trip Generation – Construction Grading and Material Export***

It is assumed that heavy construction equipment would be located on-site during grading activities and would not travel to and from the Project Site on a daily basis. However, truck trips would be generated by the Project Site during the demolition, grading, and export period, so as to remove material (from demolition) from the site. Trucks are expected to carry the export material to a receiver site located within 25 to 30 miles of the Project Site. The project applicant anticipates that trucks with a capacity to carry at least 20 tons of material per truck will be used during the export period. The export period is assumed to require approximately 22 workdays per month for six months. During the peak demolition, grading and export activities, up to 50 truck trips per day (i.e., 25 inbound and 25 outbound trips) are anticipated. Of the 50 daily truck trips, it is estimated that approximately eight truck trips (four inbound and four outbound trips) would occur during the weekday a.m. peak hour, the weekday p.m. peak hour, and the Saturday mid-day peak hour.

#### ***Construction Traffic Trip Generation – Final Grading and Structure Construction***

Activities related to final grading/structure construction period would generate a higher number of vehicle trips as compared to the grading and export period. Thus, the greatest potential for construction impact on the adjacent street system would occur during the final grading/structure construction period.

During the final grading and structure construction period, a trip generation rate of 0.36 worker vehicle trips per unit of residential development per day and 0.32 worker vehicle trips per 1,000 square feet of commercial development per day is assumed. Construction workers are expected to typically arrive at the Project Site before 7:00 a.m. and most depart before 3:00 p.m. Thus, these construction work trips would occur outside of the peak hour of traffic on the local street system. For example, as shown in the traffic study, the peak hour of traffic at the study intersections adjacent to the Project Site begins between 7:15 and 7:30 a.m. during the morning commuter period, and begins at 5:00 p.m. during the afternoon commuter period.

It is anticipated that construction workers would remain on-site throughout the day. For the residential component of the project, it is estimated that approximately 180 vehicle trips per day (i.e., 90 inbound and 90 outbound trips) would be generated by the construction workers during the peak construction phases at the site (i.e., up to 500 units constructed per construction phase). In addition, it is estimated that approximately 200 vehicle trips per day (i.e., 100 inbound and 100 outbound trips) would be generated by construction workers for the 620,000 square feet retail component, assumed to be constructed simultaneously with the residential component. Of the peak daily trip generation of 380 daily trips, it is estimated that approximately 19 construction worker vehicle trips (10 percent of the daily construction worker inbound or outbound trips) would occur during the weekday a.m. peak hour, the weekday p.m. peak hour and the Saturday mid-day peak hour.

In addition to construction worker vehicles, additional trips may be generated by miscellaneous trucks traveling to and from the Project Site. These trucks may consist of larger vehicles delivering equipment and/or construction materials to the Project Site, or smaller pick up trucks or four wheel drive vehicles used by construction supervisors and/or City inspectors. During peak construction phases, it is estimated that approximately 40 trips per day would be made by miscellaneous trucks. To conservatively estimate the equivalent number of vehicles associated with the trucks, a passenger car equivalency (PCE) factor of 2.0 was utilized based on standard traffic engineering practice. Therefore, conservatively assuming 40 daily truck trips, it is estimated that approximately 12 PCE vehicle trips (six inbound and six outbound trips) would occur during the weekday a.m. peak hour, the weekday p.m. peak hour, and the Saturday mid-day peak hour.

The traffic generation forecast for the project during peak construction activities is summarized in Table IV.L-5. As shown in Table IV.L-5, the construction worker vehicles and miscellaneous trucks are forecast to generate 460 PCE vehicle trips per day (i.e., 230 inbound and 230 outbound) during peak final grading and structure construction phases at the site. During the weekday a.m. peak hour, the weekday p.m. peak hour, and the Saturday mid-day peak hour, it is estimated that approximately 31 PCE vehicle trips would be generated during each of these peak hours.

**Table IV.L-5  
Project Trip Generation During Peak Construction Activities**

	Daily Trip Ends	Weekday AM Peak Hour Volumes			Weekday P.M. Peak Hour Volumes			Sat Mid Day Peak Hour Volumes		
		In	Out	Total	In	Out	Total	In	Out	Total
Construction Workers <sup>a</sup>	380	19	nom.	19	nom.	19	19	nom.	19	19
Construction Trucks PCE Factor <sup>b</sup>										
Construction Vehicles (PCE)	80	6	6	12	6	6	12	6	6	12
<b>TOAT NET TRIPS</b>	<b>460</b>	<b>25</b>	<b>6</b>	<b>31</b>	<b>6</b>	<b>25</b>	<b>31</b>	<b>6</b>	<b>25</b>	<b>31</b>

*Notes:*

<sup>a</sup> It is assumed that a trip generation rate of 0.36 worker vehicle trips per unit of residential development per day is used for up to 500 residential units constructed per construction phase (500 units x 0.36 worker per unit per day = 180 daily trips). In addition, it is assumed that a trip generation rate of 0.32 worker vehicle trips per 1,000 square feet of commercial development per day is used for the commercial component (620,000 square feet x 0.32 worker per 1,000 square feet per day = 200 trips). For purposes of this analysis, ten percent of daily construction worker inbound or outbound trips would occur during each of the analysis peak hours.

<sup>b</sup> It is estimated that approximately 40 trips per day would be made by miscellaneous trucks and 15% of the daily truck trips would occur during each of the analysis peak hours. A passenger car equivalency (PCE) factor of 2.0 was used to estimate the equivalent number of vehicles associated with trucks.

Source: Linscott Law and Greenspan, Engineers, August 1, 2008.

**Construction Traffic Impact Review**

It is estimated that the construction work force would likely be generated from all parts of the Los Angeles region and thereby is assumed to arrive and depart from all directions (e.g., each direction along the I-405, I-105 and I-110 Freeways and from the local areas). Based on the peak construction project trip

generation forecasts, traffic impacts due to construction activities are forecast to be less than significant based on the City's significance criteria.

### **Project Phasing Analysis**

The proposed project is planned to be constructed in three general phases, with build-out of the overall project anticipated by year 2014. The removal of the existing Hollywood Park racetrack is anticipated to be completed prior to construction of the first development phase. The following provides a general overview of the project phasing:

- **Phase I:** The first phase of development includes the construction of the retail, hotel and office components of the proposed project. (While the hotel was included in the Phase I analysis to study the maximum impacts for traffic, it is anticipated that the hotel would be developed in a later phase, depending on market conditions.) In addition, the first 1,000 residential dwelling units will be constructed under Phase I. As discussed previously, the casino/off-track betting component of the project will remain at its current location. Primary vehicular access for this phase will be provided via the Hardy Street, 97<sup>th</sup> Street, Doty Avenue, and Yukon Avenue access driveways. In addition, the proposed signalized driveway on Century Boulevard east of Doty Avenue will also be constructed to serve the casino/off-track betting component.
- **Phase II:** The second phase of development includes the construction of the civic use component and the next 1,000 residential dwelling units of the proposed project. In addition to the vehicular access driveways provided under Phase I development, the Arbor Vitae Street access driveway will be constructed under Phase II to provide vehicular access to the civic use and residential components of the project.
- **Phase III:** The final phase of development includes the construction of the remaining 995 residential dwelling units for the proposed project. In addition to the vehicular access driveways provided under Phase I and Phase II development, the Pincay Drive access opposite Carlton Drive will be constructed under Phase III to provide vehicular access to the residential component of the project.

The following sections summarize the results of additional traffic analyses prepared to identify the project mitigation measures required under each development phase. This evaluation involved the preparation of phased trip generation forecasts and supplemental intersection Level of Service analyses. It should be noted that the phased traffic impact analysis focused solely on the six study intersections that were forecast to be significantly impacted by the overall build-out of the proposed project.

### ***Project Phase I Analysis***

The weekday trip generation forecast for Phase I project development is summarized in the Project Traffic Study. As shown, Phase I project development is expected to generate an additional 852 vehicle trips (401 more inbound trips and 451 more outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, Phase I project development is expected to generate 874 fewer vehicle trips



(759 more inbound trips and 1,633 fewer outbound trips). Over a 24-hour period, Phase I project development is forecast to generate an additional 8,086 daily trip ends during a typical weekday (4,043 inbound trips and 4,043 outbound trips).

The weekend trip generation forecast for Phase I project development is summarized in the Project Traffic Study (see Appendix G-1 to this Draft EIR). As shown, Phase I project development is expected to generate an additional 675 vehicle trips (272 fewer inbound trips and 947 more outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, Phase I project development is forecast to generate an additional 17,420 daily trip ends during a typical weekend day (8,710 inbound trips and 8,710 outbound trips).

In order to determine the operating conditions of the six study intersections with the Phase I project development, traffic associated with Phase I project development was assigned to the local roadway system based on the trip distribution and assignment characteristics consistent with the proposed project and the Phase I site access scheme. As shown in the Project Traffic Study (see Appendix G-1 to this Draft EIR), application of the City of Inglewood's threshold criteria to the "With Phase I Project" scenario indicates that Phase I project development is expected to create a significant impact at the following study intersection during the Saturday mid-day peak hour.

- Intersection No. 47: Crenshaw Boulevard/Century Boulevard

Incremental but not significant impacts are noted at the remaining study intersections due to the Phase I project development. The traffic mitigation measure recommended for the proposed project at this location is anticipated to reduce the traffic impacts associated with Phase I project development to less than significant levels. Based on a review of the significantly impacted study location under Phase I project development, it is recommended that the project applicant provide full funding for ITS improvements at seven signalized intersections along Century Boulevard, between Prairie Avenue and Van Ness Avenue. It is anticipated that these ITS improvements can be integrated and synchronized with the City of Los Angeles' ATSA system along the Century Boulevard corridor to the east. In addition, it is anticipated that the project design features/frontage improvements discussed previously will be completed at the following study intersections as part of the Phase I project development:

- Intersection No. 29: Prairie Avenue/Hardy Street
- Intersection No. 30: Prairie Avenue/Century Boulevard
- Intersection No. 38: Doty Street/Century Boulevard
- Intersection No. 39: Yukon Street/Century Boulevard
- Intersection No. 65: Proposed Signalized Driveway/Century Boulevard
- Intersection No. 66: Prairie Avenue/97th Street

### ***Project Buildout Analysis (Phases I, II, and III)***

The weekday trip generation forecast for Phases I & II project development is summarized in the Project Traffic Study. As shown, Phases I & II project development is expected to generate an additional 1,366 vehicle trips (570 more inbound trips and 796 more outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, Phases I & II project development is expected to generate 402 fewer vehicle trips (1,055 more inbound trips and 1,457 fewer outbound trips). Over a 24-hour period, Phases I & II project development is forecast to generate an additional 13,068 daily trip ends during a typical weekday (6,534 inbound trips and 6,534 outbound trips).

The weekend trip generation forecast for Phases I & II project development is summarized in the Project Traffic Study (see Appendix G-1 to this Draft EIR). As shown, Phases I & II project development is expected to generate an additional 1,076 vehicle trips (56 fewer inbound trips and 1,132 more outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, Phases I & II project development is forecast to generate an additional 22,520 daily trip ends during a typical weekend day (11,260 inbound trips and 11,260 outbound trips).

In order to determine the operating conditions of the six study intersections with the Phases I & II project development, traffic associated with Phases I & II project development was assigned to the local roadway system based on the trip distribution and assignment characteristics consistent with the proposed project and the Phases I & II site access scheme. As shown in the Project Traffic Study (see Appendix G-1 to this Draft EIR), application of the City of Inglewood's threshold criteria to the "With Phases I & II Project" scenario indicates that Phases I & II project development is expected to create a significant impact at the following four study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour:

- Intersection No. 19: La Brea Avenue/Florence Avenue
- Intersection No. 25: Prairie Avenue/Florence Avenue
- Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard
- Intersection No. 47: Crenshaw Boulevard/Century Boulevard

Incremental but not significant impacts are noted at the remaining study intersections due to the Phases I & II project development. The traffic mitigation measures recommended for the Proposed Project at these four locations are anticipated to reduce the traffic impacts associated with Phases I & II project development to less than significant levels. Based on a review of the significantly impacted study locations under Phases I & II project development, it is recommended that the project applicant provide full funding for ITS improvements at a total of 16 signalized intersections. In addition to the ITS improvements recommended as part of the Phase I project development (i.e., at seven signalized intersections along Century Boulevard), it is recommended that ITS improvements be implemented at nine additional signalized intersections along the Crenshaw Boulevard, Florence Avenue, Centinela Avenue, and La Brea Avenue corridors. It is anticipated that these ITS improvements can be integrated

and synchronized with the City of Los Angeles' ATSAC system along the Century Boulevard, Crenshaw Boulevard, Florence Avenue, and Centinela Avenue corridors. In addition, it is anticipated that the project design features/frontage improvements discussed previously will be completed at the following study intersections as part of the Phases I & II project development:

- Intersection No. 28: Prairie Avenue/Arbor Vitae Street
- Intersection No. 29: Prairie Avenue/Hardy Street
- Intersection No. 30: Prairie Avenue/Century Boulevard
- Intersection No. 38: Doty Street/Century Boulevard
- Intersection No. 39: Yukon Street/Century Boulevard
- Intersection No. 65: Proposed Signalized Driveway/Century Boulevard
- Intersection No. 66: Prairie Avenue/97<sup>th</sup> Street

### *Project Phases I & II Analysis*

A full discussion of the trip generation forecasts and traffic impacts analysis for the full build-out can be found in the Project Traffic Study. In addition to the ITS improvements recommended as part of Phase I and II project development at 16 signalized intersections, it is recommended that ITS improvements be implemented at three additional intersections along Century Boulevard, between the I-405 Freeway and La Brea Avenue.

### **Land Use Equivalency Program Impacts**

A land use equivalency matrix has been prepared to provide development flexibility by permitting shifts of permitted floor area between certain land use categories, while maintaining the intent and regulatory requirements of the project. The equivalency program defines a specific framework within which certain land uses can be exchanged for other land uses without increasing potential traffic impacts. Under this program, Hollywood Park ultimately may be developed to achieve a revised range of land use mixes in order to respond to future market and region needs and demands. There can be increases in the square footages of certain land uses in exchange for corresponding decreases in the square footages of other land uses.

In order to implement the equivalency program, a set of equivalency factors have been prepared. The equivalency factor for each use is derived based on the project's general mix of land uses as currently proposed and the weekday PM peak hour project trip generation. Equivalency factors for the permitted uses are summarized in the Traffic Impact Study.

## CUMULATIVE IMPACTS

### Weekday Future Cumulative Conditions

The v/c ratio at the 66 study intersections are incrementally increased by the addition of traffic generated by the Related Projects. As shown in Table IV.L-2, application of the City's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative developments in the project vicinity are expected to create cumulative impacts at the following 22 of the 66 study intersections during the weekday AM and/or PM peak hours:

- Int. No. 1: Sepulveda Boulevard/Slauson Avenue (PM Peak Hour - City of Culver City)
- Int. No. 2: Sepulveda Boulevard/Centinela Avenue (AM and PM Peak Hour - City of Los Angeles)
- Int. No. 3: La Cienega Boulevard (SB)/Slauson Avenue (PM Peak Hour - County of Los Angeles)
- Int. No. 5: La Tijera Boulevard/Centinela Avenue (AM Peak Hour - City of Los Angeles)
- Int. No. 7: La Cienega Boulevard/Centinela Avenue (AM and PM Peak Hour - City of Los Angeles)
- Int. No. 10: La Cienega Boulevard/Arbor Vitae Street (PM Peak Hour - City of Inglewood)
- Int. No. 12: La Cienega Boulevard/Century Boulevard (PM Peak Hour - City of Los Angeles)
- Int. No. 15: Inglewood Avenue/Arbor Vitae Street (AM and PM Peak Hour - City of Inglewood)
- Int. No. 16: Inglewood Avenue/Century Boulevard (PM Peak Hour - City of Inglewood)
- Int. No. 17: La Brea Avenue/Slauson Avenue (PM Peak Hour - County of Los Angeles)
- Int. No. 20: La Brea Avenue/Manchester Boulevard (AM Peak Hour - City of Inglewood)
- Int. No. 23: Hawthorne Boulevard/Imperial Highway (PM Peak Hour - City of Hawthorne)
- Int. No. 24: Centinela Avenue/Florence Avenue (AM and PM Peak Hour - City of Inglewood)
- Int. No. 26: Prairie Avenue/Manchester Boulevard (PM Peak Hour - City of Inglewood)
- Int. No. 30: Prairie Avenue/Century Boulevard (AM Peak Hour - City of Inglewood)
- Int. No. 33: Prairie Avenue/Imperial Highway (AM Peak Hour - City of Hawthorne)
- Int. No. 35: Crenshaw Dr. Briarwood Lane/Manchester Blvd. (AM Peak Hour - City of Inglewood)
- Int. No. 39: Yukon Avenue-Gate 5/Century Boulevard (PM Peak Hour - City of Inglewood)
- Int. No. 41: Crenshaw Boulevard/Slauson Avenue (PM Peak Hour - City of Los Angeles)

Int. No. 48: Crenshaw Boulevard/Imperial Highway (PM Peak Hour - City of Inglewood)

Int. No. 55: Western Avenue/Century Boulevard (PM Peak Hour - City of Los Angeles)

Int. No. 56: Vermont Avenue/Manchester Avenue (AM and PM Peak Hour - City of Los Angeles)

Incremental, but not significant cumulative impacts are noted at the remaining 44 study intersections during the weekday AM and PM peak hours. The future cumulative (existing, ambient growth, project and Related Projects) traffic volumes at the study intersections during the weekday AM and PM peak hours are displayed in Figures IV.L-22 and IV.L-23, respectively.

### **Saturday Future Cumulative Conditions**

As shown in Table IV.L-2, application of the City's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative developments in the project vicinity are expected to create cumulative impacts at the following nine of the 66 study intersections during the Saturday mid-day peak hour:

Int. No. 2: Sepulveda Boulevard/Centinel Avenue (City of Los Angeles)

Int. No. 17: La Brea Avenue/Slauson Avenue (County of Los Angeles)

Int. No. 20: La Brea Avenue/Manchester Boulevard (City of Inglewood)

Int. No. 38: Doty Avenue-Gate 4/Century Boulevard (City of Inglewood)

Int. No. 39: Yukon Avenue-Gate 5/Century Boulevard (City of Inglewood)

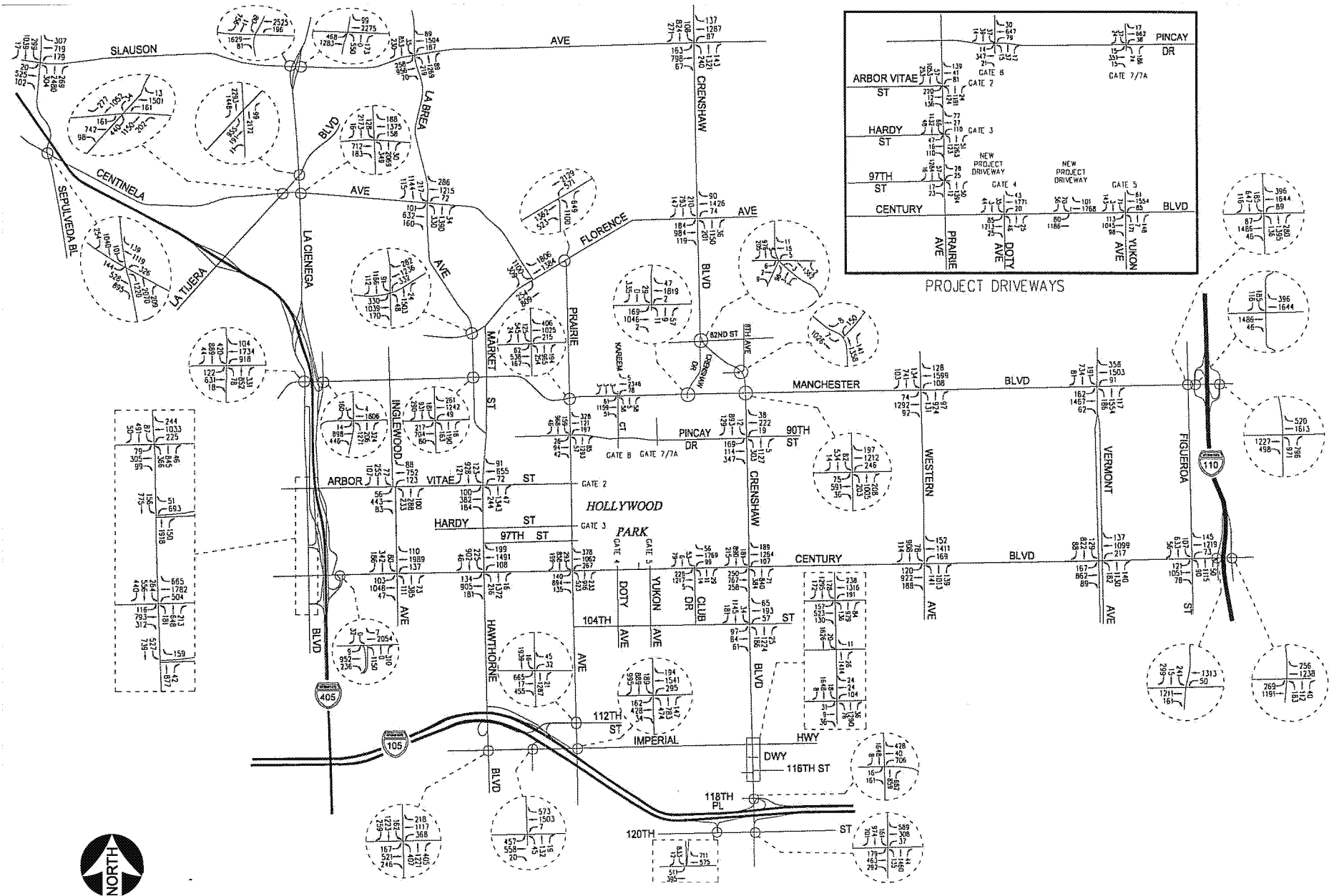
Int. No. 40: Club Drive/Century Boulevard (City of Inglewood)

Int. No. 42: Crenshaw Boulevard/Florence Avenue (City of Los Angeles)

Int. No. 46: Crenshaw Boulevard/Pincay Drive-90<sup>th</sup> Street (City of Inglewood)

Int. No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood)

Incremental, but not significant cumulative impacts are noted at the remaining 57 study intersections during the Saturday mid-day peak hour. The future cumulative (existing, ambient growth, project and Related Projects) traffic volumes at the study intersections during the Saturday mid-day peak hour are displayed in Figure IV.L-24.

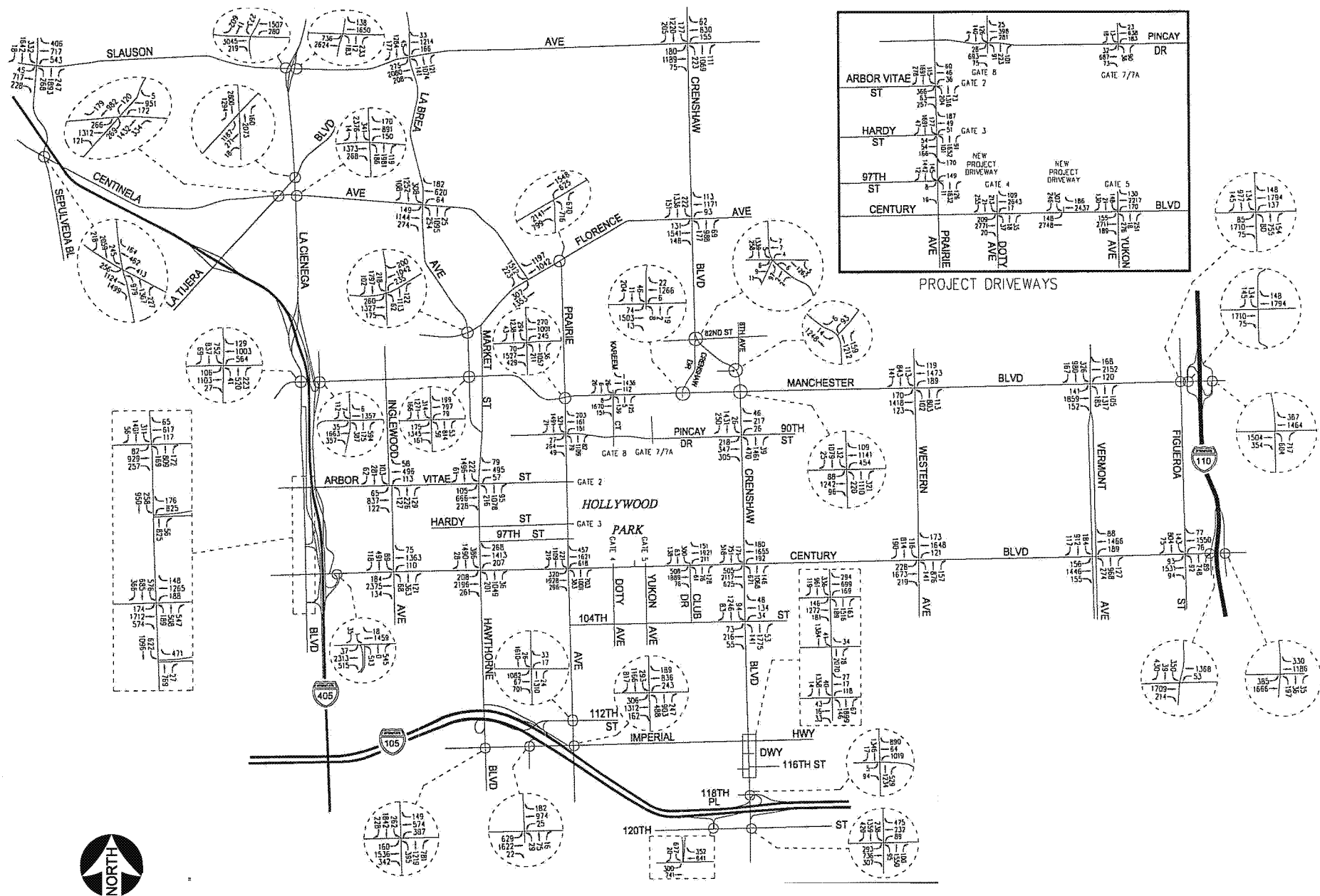


Source: Linscott, Law & Greenspan, August 1, 2008



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

Figure IV.L-22  
Future Cumulative Traffic Volumes  
Weekday AM Peak Hour

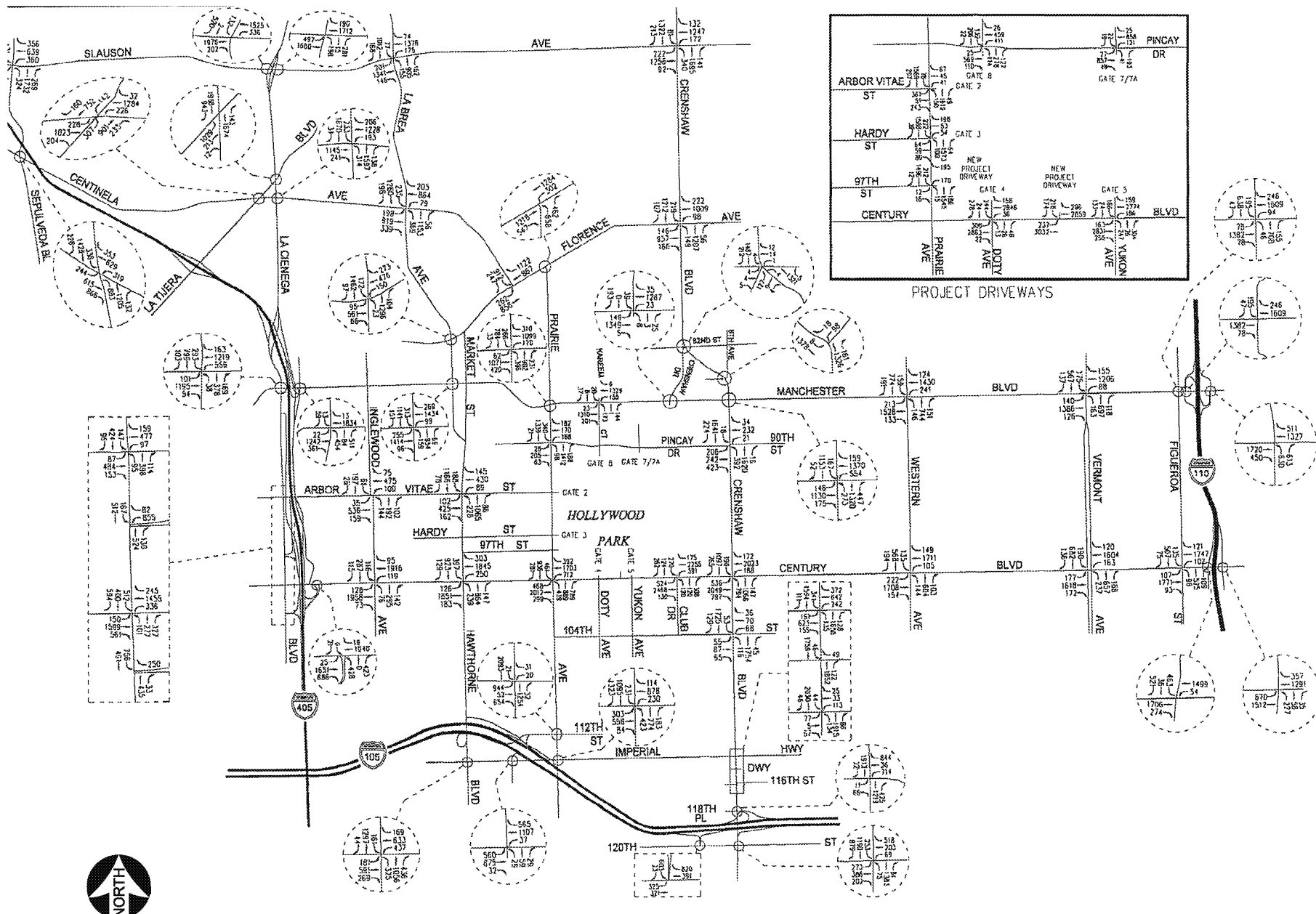


Source: Linscott, Law & Greenspan, August 1, 2008.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research

Figure IV.L-23  
Future Cumulative Traffic Volumes  
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, August 1, 2008.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
 Environmental Planning and Research

**Figure IV.L-24**  
 Future Cumulative Traffic Volumes  
 Saturday Mid-Day Peak Hour



## Cumulative Phasing Analysis

As discussed previously, the proposed project is planned to be constructed in three general phases, with build-out of the overall project anticipated by year 2014. The following sections summarize the results of additional traffic analyses prepared to identify the cumulative mitigation measures under each project development phase. This evaluation involved the preparation of supplemental intersection Level of Service analyses and the project's pro-rata percentage of cumulative improvement measures. It should be noted that the cumulative phasing analysis focused solely on the 27 study intersections that were forecast to be significantly impacted by the overall build-out of the proposed project and the related projects.

### *Phase I Cumulative Analysis*

As shown in the Project Traffic Study, application of the City of Inglewood's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative development of the Phase I project and the related projects are expected to create cumulative impacts at the following 22 study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour:

- Int. No. 1: Sepulveda Boulevard-Slauson Avenue
- Int. No. 2: Sepulveda Boulevard/Centinela Avenue
- Int. No. 3: La Cienega Boulevard (SB)/Slauson Avenue
- Int. No. 5: La Tijera Boulevard/Centinela Avenue
- Int. No. 7: La Cienega Boulevard/Centinela Avenue
- Int. No. 10: La Cienega Boulevard/Arbor Vitae Street
- Int. No. 15: Inglewood Avenue/Arbor Vitae Street
- Int. No. 16: Inglewood Avenue/Century Boulevard
- Int. No. 17: La Brea Avenue/Slauson Avenue
- Int. No. 20: La Brea Avenue/Manchester Boulevard
- Int. No. 23: Hawthorne Boulevard/Imperial Highway
- Int. No. 24: Centinela Avenue/Florence Avenue
- Int. No. 26: Prairie Avenue/Manchester Boulevard
- Int. No. 33: Prairie Avenue/Imperial Highway

- Int. No. 35: Crenshaw Drive-Briarwood Lane/Manchester Boulevard
- Int. No. 38: Doty Avenue-Gate 4/Century Boulevard
- Int. No. 39: Yukon Avenue-Gate 5/Century Boulevard
- Int. No. 40: Club Drive/Century Boulevard
- Int. No. 41: Crenshaw Boulevard/Slauson Avenue
- Int. No. 47: Crenshaw Boulevard/Century Boulevard
- Int. No. 55: Western Avenue/Century Boulevard
- Int. No. 56: Vermont Avenue/Manchester Avenue

The cumulative traffic mitigation measures recommended in Section 12.1 of the Project Traffic Study at these locations are anticipated to reduce the forecast cumulative impacts to less than significant levels, as shown in the Project Traffic Study. The project Phase I development will contribute its fair share to the cumulative mitigation measures. As summarized in the Project Traffic Study, the project Phase I development's fair share contribution toward the cumulative improvements ranges from no contribution to 10.2%.

### **Phases I & II Cumulative Analysis**

As shown in the Project Traffic Study, application of the City of Inglewood's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative development of the Phases I & II project and the related projects are expected to create cumulative impacts at the following 25 study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour:

- Int. No. 1: Sepulveda Boulevard-Slauson Avenue
- Int. No. 2: Sepulveda Boulevard/Centinela Avenue
- Int. No. 3: La Cienega Boulevard (SB)/Slauson Avenue
- Int. No. 5: La Tijera Boulevard/Centinela Avenue
- Int. No. 7: La Cienega Boulevard/Centinela Avenue
- Int. No. 10: La Cienega Boulevard/Arbor Vitae Street
- Int. No. 12: La Cienega Boulevard/Century Boulevard
- Int. No. 15: Inglewood Avenue/Arbor Vitae Street

- Int. No. 16: Inglewood Avenue/Century Boulevard
- Int. No. 17: La Brea Avenue/Slauson Avenue
- Int. No. 20: La Brea Avenue/Manchester Boulevard
- Int. No. 23: Hawthorne Boulevard/Imperial Highway
- Int. No. 24: Centinela Avenue/Florence Avenue
- Int. No. 26: Prairie Avenue/Manchester Boulevard
- Int. No. 30: Prairie Avenue/Century Boulevard
- Int. No. 33: Prairie Avenue/Imperial Highway
- Int. No. 35: Crenshaw Drive-Briarwood Lane/Manchester Boulevard
- Int. No. 38: Doty Avenue-Gate 4/Century Boulevard
- Int. No. 39: Yukon Avenue-Gate 5/Century Boulevard
- Int. No. 40: Club Drive/Century Boulevard
- Int. No. 41: Crenshaw Boulevard/Slauson Avenue
- Int. No. 46: Crenshaw Boulevard/Pincay Drive-90th Street
- Int. No. 47: Crenshaw Boulevard/Century Boulevard
- Int. No. 55: Western Avenue/Century Boulevard
- Int. No. 56: Vermont Avenue/Manchester Avenue

The cumulative traffic mitigation measures recommended in Section 12.1 of the Project Traffic Study at these locations are anticipated to reduce the forecast cumulative impacts to less than significant levels, as shown in the Project Traffic Study. The project Phases I & II development will contribute its fair share to the cumulative mitigation measures. As summarized in the Project Traffic Study, the project Phases I & II development's fair share contribution toward the cumulative improvements ranges from no contribution to 19.4%.

### **Phases I, II & III Cumulative Analysis**

The future cumulative traffic impact analysis for full build-out of the Project (Phase I, II and III) are included in the Project Traffic Study. As summarized in the Project Traffic Study, the build-out fair share

contribution towards the cumulative improvements ranges from no contribution to 22.6%.

## **PROJECT DESIGN FEATURES**

The following Project Design Features are incorporated into the Project Description and were used in the basis for formulating portions of the environmental analysis with respect to traffic and transportation impacts. As such, it is recommended that the lead agency incorporate the following Project Design Features as conditions of Project approval.

**PDF L-1. Intersection No. 28: Prairie Avenue/Arbor Vitae Street**

Widen and restripe the northbound Prairie Avenue approach to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, restripe the eastbound Arbor Vitae Street approach within the existing pavement width to provide one left-turn lane and one shared through/right-turn lane. Also, provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be developed as part of Phase II development.

**PDF L-2. Intersection No. 29: Prairie Avenue/Hardy Street**

Widen and restripe the northbound Prairie Avenue approach to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, widen and restripe the eastbound Hardy Street approach within the existing right-of-way to provide one left-turn lane and one shared through/right-turn lane. Also, provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

**PDF L-3. Intersection No. 30: Prairie Avenue/Century Boulevard**

Widen and restripe the westbound Century Boulevard approach along the north side to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, modify the traffic signal to provide a westbound right-turn overlapping phase to be operated concurrently with the southbound left-turn phase. This intersection will be improved as part of Phase I development.

**PDF L-4. Intersection No. 37: Carlton Drive/Pincay Drive**

Provide one shared left-turn/through/right-turn lane on the northbound approach to the Carlton Drive/Pincay Drive intersection. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase III development.

PDF L-5. Intersection No. 38: Doty Avenue/Century Boulevard

Restripe the northbound Doty Avenue approach within the existing pavement width to provide one left-turn lane and one shared through/right-turn lane. In addition, provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach. Also, widen and restripe the westbound Century Boulevard approach to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

PDF L-6. Intersection No. 39: Yukon Avenue/Century Boulevard

Restripe the northbound Yukon Avenue approach within the existing pavement width to provide one left-turn lane, one through lane, and one shared through/right-turn lane. In addition, provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach. Also, widen and restripe the westbound Century Boulevard approach to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane. Modify the traffic signal equipment accordingly to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

PDF L-7. Intersection No. 65: Proposed Signalized Driveway/Century Boulevard

Install a traffic signal at the proposed private driveway, to be located approximately 600 feet east of Doty Avenue, to accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. Provide one left-turn lane and one right-turn only lane on the southbound approach to the Century Boulevard intersection. In addition, widen and restripe the westbound Century Boulevard approach to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be three through lanes and one right-turn only lane. This intersection will be improved as part of Phase I development.

PDF L-8. Intersection No. 66: Prairie Avenue/97<sup>th</sup> Street

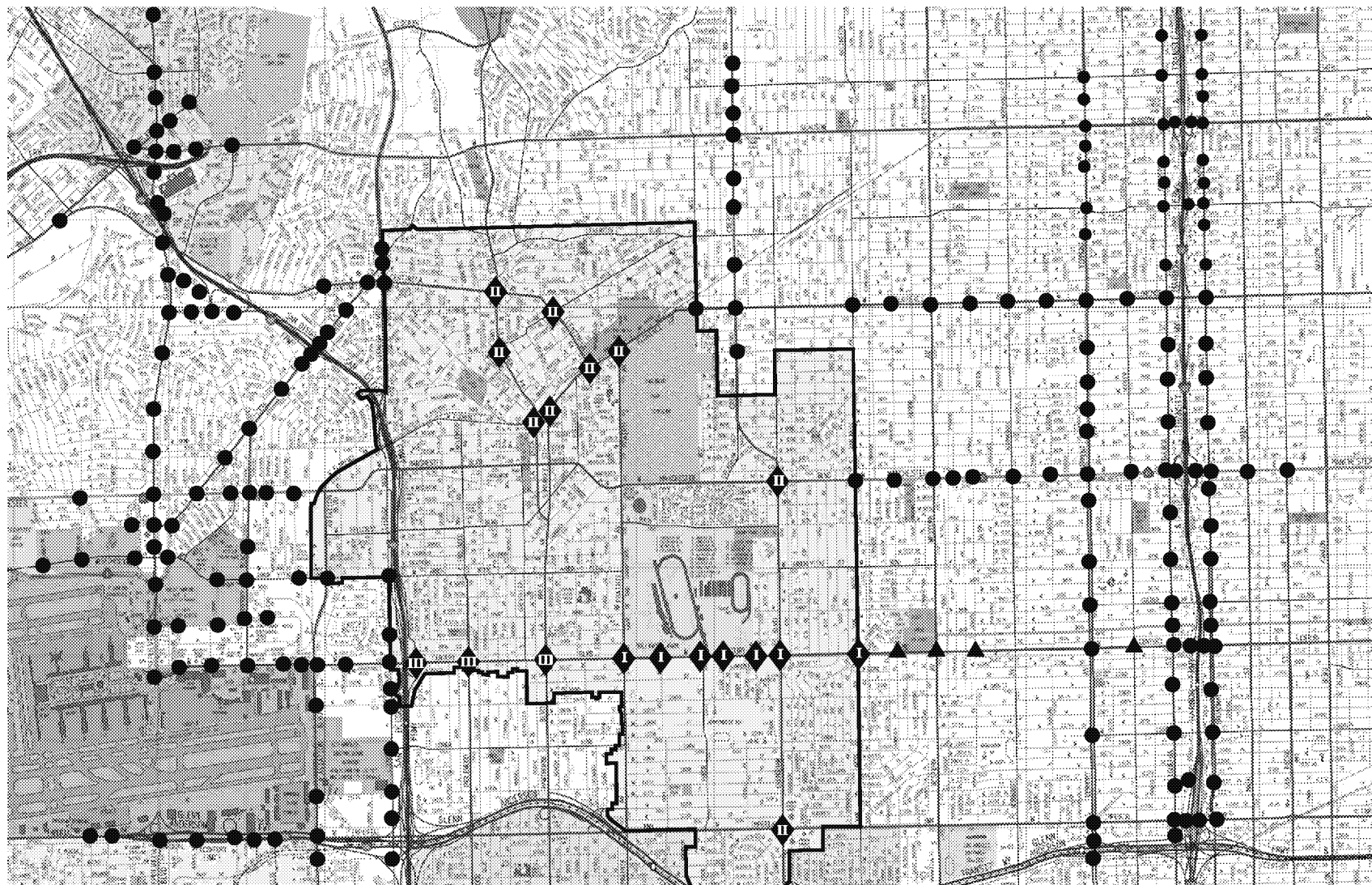
Widen and restripe the northbound Prairie Avenue approach to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, widen and restripe the eastbound 97<sup>th</sup> Street approach within the existing right-of-way to provide one left-turn lane and one shared through/right-turn lane. Also, provide one left-turn lane and one shared through/right-turn lane on the westbound approach. Install a traffic signal at this intersection to accommodate 97<sup>th</sup> Street and the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

## MITIGATION MEASURES







### Project Impact Mitigation Measures

Application of the City of Inglewood's threshold criteria to the "With Proposed Project" scenario indicates that six of the 66 study intersections are anticipated to be significantly impacted due to traffic generated by the Hollywood Park Redevelopment Project. Transportation mitigation measures typically consist of improvements such as traffic signal modifications and/or intersection restriping and roadway widening to accommodate additional travel lanes. The Project Applicant proposes as its primary mitigation strategy a funding contribution to continue development and enhancement of the City's Intelligent Transportation System (ITS). The ITS system will enhance the ability of the traffic signal controller to adjust traffic signal timing and intersections on a real-time basis and synchronize traffic signals along key roadways in response to changing traffic volume patterns. Traffic signal system enhancements such as the City of Inglewood ITS program have been shown to increase the effective intersection capacity by at least ten percent (10%), as before and after studies within other jurisdictions have demonstrated capacity enhancements ranging between 12 and 15 percent. ITS also gives immediate results over more time-consuming physical roadway improvements, which may involve physical right-of-way constraints, eminent domain for privately owned parcels, lengthy construction time, and in many cases surface parking may be displaced or lost due to roadway widening measures. Furthermore, the City of Inglewood is surrounded by the City of Los Angeles Automatic Traffic Surveillance and Control (ATSAC) system. If the City of Inglewood ITS improvements were linked to the ATSAC system, a fully integrated automated network would improve traffic conditions along major roadways traversing through Inglewood. For a discussion of alternative roadway improvements that were deemed infeasible or otherwise not desirable, see Appendix G-1 of this EIR.

- MM L-1. *Intersection No. 18: La Brea Avenue/Centinela Avenue (City of Inglewood).* The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-2. *Intersection No. 19: La Brea Avenue/Florence Avenue (City of Inglewood).* The Project Applicant shall provide the funding contribution to develop and enhance the City



**Legend**

- |                                                                                     |                                                   |                                                                                     |                                                |
|-------------------------------------------------------------------------------------|---------------------------------------------------|-------------------------------------------------------------------------------------|------------------------------------------------|
|  | <b>CITY OF INGLEWOOD BOUNDARY</b>                 |  | <b>PROPOSED PROJECT PHASE I ITS LOCATION</b>   |
|  | <b>LADOT ATSAC LOCATION</b>                       |  | <b>PROPOSED PROJECT PHASE II ITS LOCATION</b>  |
|  | <b>LADOT ATSAC LOCATION<br/>(TO BE COMPLETED)</b> |  | <b>PROPOSED PROJECT PHASE III ITS LOCATION</b> |

Source: Linscott, Law & Greenspan, Engineers, August 1, 2008.

of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).

MM L-3. ***Intersection No. 22: La Brea Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development (see Figure IV.L-25).

MM L-4. ***Intersection No. 25: Prairie Avenue/Florence Avenue (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).

MM L-5. ***Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).

MM L-6. ***Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).

In addition to the Project's six impacted intersections, the Project Applicant will provide full funding for a traffic signal synchronization network at an additional 13 intersections, for a total of 19 ITS improved intersections. The additional 13 intersections are listed below, along with the phase in which it will be implemented.

MM L-7. ***Intersection No. 24: Centinela Avenue/Florence Avenue (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).

MML-8. ***Intersection No. 14: I-405 Northbound Ramps/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development (see Figure IV.L-25).

MML-9. ***Intersection No. 16: Inglewood Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development (see Figure IV.L-25).



- MM L-10. ***Intersection No. 30: Prairie Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).
- MM L-11. ***Intersection No. 38: Doty Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).
- MM L-12. ***Intersection No. 39: Yukon Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).
- MM L-13. ***Intersection No. 40: Club Drive/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).
- MM L-14. ***Intersection No. 51: Crenshaw Boulevard/Imperial Highway (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-15. ***Non-Study Intersection: La Brea Avenue/Hyde Park Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-16. ***Non-Study Intersection: Market Street/Florence Avenue (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-17. ***Non-Study Intersection: Centinela Avenue/Hyde Park Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-18. ***Non-Study Intersection: 11th Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).

- MM L-19. ***Non-Study Intersection: Van Ness Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).

### **Cumulative Impact Mitigation Measures**

Cumulative development of the Proposed Project and the Related Projects are expected to create cumulative impacts at 27 study intersections during the weekday AM peak hour, PM peak hour, and/or the Saturday mid-day peak hour (14 of which are located in the City of Inglewood). It should be noted that approval of some of the cumulative mitigation measures associated with study intersections located outside of Inglewood is beyond the control of the City of Inglewood (the Lead Agency). The Proposed Project will contribute its fair-share to the cumulative mitigation measures, as indicated, for each mitigation measure identified below. The cumulative impact fair share measures shall be phased based upon the total amount of trips to be generated by a particular increment of development, at the time of site plan or other site specific approval.

- MM L-20. ***Intersection No. 1: Sepulveda Boulevard/Slauson Avenue (City of Culver City).*** To the extent that Culver City (1) adopts a transportation improvement or similar fee that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Culver City determines to approve the implementation of the following improvements, the Project Applicant shall contribute 4.3% of the estimated total estimated cost of implementing the following roadway improvements: (1) Provide a northbound right-turn only lane within the northbound approach lane at this intersection, and (2) Modify the eastbound approach on Slauson Avenue at Sepulveda Boulevard to provide one additional through lane. The resultant northbound approach lane configuration would provide two left-turn lanes, three through lanes, and one right-turn only lane. The resultant eastbound approach lane configuration would provide one left-turn lane, three through lanes, and one right-turn only lane. It should be noted that there are three existing departure lanes on Slauson Avenue east of Sepulveda Boulevard.

- MM L-21. ***Intersection No. 2: Sepulveda Boulevard/Centinela Avenue (City of Los Angeles).*** To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of the City of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute 0.1% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional northbound left-turn lane, (2) Modify the southbound approach on Sepulveda Boulevard at Centinela Avenue to provide one additional through lane, and (3) Contribute 0.1% of the total cost to install the Adaptive

Traffic Control System (ATCS) at this intersection. The resultant northbound approach lane configuration would provide three left-turn lanes, three through lanes, and one right-turn only lane. The resultant southbound approach lane configuration would provide two left-turn lanes, four through lanes, and one right-turn only lane. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures so that the measures may ultimately be infeasible.

- MM L-22. ***Intersection No. 3: La Cienega Boulevard (SB)/Slauson Avenue (County of Los Angeles).*** The Project Applicant shall contribute 5.3% of the total estimated cost to develop and enhance the traffic signal operations at this location.
- MM L-23. ***Intersection No. 5: La Tijera Boulevard/Centinela Avenue (City of Los Angeles).*** The Project Applicant shall contribute 5.1% of the total estimated cost to develop and enhance the traffic signal operations at this location.
- MM L-24. ***Intersection No. 7: La Cienega Boulevard/Centinela Avenue (City of Los Angeles).*** To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute 0.4% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional left-turn lane on both the northbound and southbound La Cienega Boulevard approaches, and (2) Contribute 0.4% of the total cost to install the ATCS at this location. The resultant northbound and southbound approach lane configurations would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane.
- MM L-25. ***Intersection No. 10: La Cienega Boulevard/Arbor Vitae Street (City of Inglewood).*** The Project Applicant shall contribute 8.5% of the total estimated cost to develop and enhance the City of Inglewood ITS program at this intersection.
- MM L-26. ***Intersection No. 12: La Cienega Boulevard/Century Boulevard (City of Los Angeles).*** The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.
- MM L-27. ***Intersection No. 15: Inglewood Avenue/Arbor Vitae Street (City of Inglewood).*** The Project Applicant shall contribute 18.8% of the total estimated cost to implement the following roadway improvements: (1) Restrict parking along the north side of Arbor Vitae Street during the weekday AM peak hour so as to allow the westbound approach curb lane to function as a shared through/right-turn lane through the intersection, and (2) Restrict parking along the south side of Arbor Vitae Street during the weekday PM peak

hour so as to allow the eastbound approach curb lane to function as a shared through/right-turn lane through the intersection. The resultant westbound approach lane configuration during the weekday AM peak hour would provide one left-turn lane, one through lane, and one shared through/right-turn lane. The resultant eastbound approach lane configuration during the weekday PM peak hour would provide one left-turn lane, one through lane, and one shared through/right-turn lane.

- MM L-28. ***Intersection No. 16: Inglewood Avenue/Century Boulevard (City of Inglewood).*** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-29. ***Intersection No. 17: La Brea Avenue/Slauson Avenue (County of Los Angeles).*** To the extent that the County of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles County determines to approve the implementation of the following improvements, the Project Applicant shall contribute 5.1% of the total estimated cost to implement the following roadway improvements: (1) Re-stripe the southbound La Brea Avenue approach at Slauson Avenue to provide a shared through/right-turn lane through the intersection, (2) Modify the existing traffic signal to remove the existing southbound overlapping right-turn signal phase, and (3) Contribute 5.1% of the total cost to develop and enhance the traffic signal operations at this location. The resultant southbound approach lane configuration would provide a left-turn lane, two through lanes, and one shared through/right-turn lane. It should be noted that there are three existing departure lanes on La Brea Avenue south of Slauson Avenue.
- MM L-30. ***Intersection No. 20: La Brea Avenue/Manchester Boulevard (City of Inglewood).*** The Project Applicant shall contribute 5.3% of the total estimated cost to implement the following roadway improvements: (1) Provide an additional northbound through lane, (2) Restrict parking along the north side of Manchester Boulevard adjacent to La Brea Avenue during the Saturday Mid-day peak hour and convert the westbound approach right-turn only lane into a shared through/right-turn lane through the intersection, and (3) Contribute 5.3% of the cost estimated to develop and enhance the City of Inglewood ITS program at this intersection. Some parking along the east side of La Brea Avenue will need to be restricted during these time periods and some widening may be required to accommodate this measure. The resultant northbound approach lane configuration would provide one left-turn lane, two through lanes, and one shared through/right-turn lane through the intersection. The resultant westbound approach lane configuration during the Saturday Mid-day peak hour would provide one left-turn lane, two through lanes, and one shared through/right-turn lane.

- MM L-31. ***Intersection No. 23: Hawthorne Boulevard/Imperial Highway (City of Hawthorne)*** To the extent that the City of Hawthorne (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Hawthorne determines to approve the implementation of the following improvements, the Project Applicant shall contribute 7.2% of the total estimated cost to implement the following roadway improvements: (1) Provide an additional northbound right-turn only lane; (2) Modify the southbound approach to provide one additional through lane; (3) Modify the westbound approach to provide an additional westbound left-turn lane; and (4) Contribute 7.2% of the total estimated cost to develop and enhance the traffic signal operations at this location. The resultant northbound approach lane configuration would provide two left-turn lanes, three through lanes, and two right-turn only lanes. The resultant southbound approach lane configuration would provide one left-turn lane, three through lanes, and one shared through/right-turn lane. The resultant westbound approach lane configuration would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures so that the measures may ultimately be infeasible.
- MM L-32. ***Intersection No. 24: Centinela Avenue/Florence Avenue (City of Inglewood)***. No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection to implement the following roadway improvements: (1) Convert the southbound Centinela Avenue approach right-turn only lane at Florence Avenue to provide a shared left-turn/right-turn lane, and (2) develop and enhance the City of Inglewood ITS program at this intersection. The resultant southbound approach lane configuration would provide two left-turn lanes and one shared left-turn/right-turn lane.
- MM L-33. ***Intersection No. 26: Prairie Avenue/Manchester Boulevard (City of Inglewood)***. The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.
- MM L-34. ***Intersection No. 30: Prairie Avenue/Century Boulevard (City of Inglewood)***. No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-35. ***Intersection No. 33: Prairie Avenue/Imperial Highway (City of Hawthorne)***. To the extent the City of Hawthorne adopts a city-wide signal synchronization program, the Project Applicant shall contribute 17.3% of the total estimated cost to develop and

enhance the ITS program (or a similar traffic signal synchronization system) at this intersection.

- MM L-36. ***Intersection No. 35: Crenshaw Drive-Briarwood Lane/Manchester Boulevard (City of Inglewood).*** The Project Applicant shall contribute 22.6% of the total estimated cost to develop and enhance the City of Inglewood ITS program at this intersection.
- MM L-37. ***Intersection No. 38: Doty Avenue-Gate 4/Century Boulevard (City of Inglewood).*** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-38. ***Intersection No. 39: Yukon Avenue-Gate 5/Century Boulevard (City of Inglewood).*** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-39. ***Intersection No. 40: Club Drive/Century Boulevard (City of Inglewood).*** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-40. ***Intersection No. 41: Crenshaw Boulevard/Slauson Avenue (City of Los Angeles).*** The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.
- MM L-41. ***Intersection No. 42: Crenshaw Boulevard/Florence Avenue (City of Los Angeles).*** The Project Applicant shall contribute 2.4% of the funding towards the installation of the ATSAC at this intersection (as this intersection is not currently operated under the City's ATSAC system).
- MM L-42. ***Intersection No. 46: Crenshaw Boulevard/Pincay Drive-90th Street (City of Inglewood).*** The Project Applicant shall contribute 18.4% of the total estimated cost to implement the following roadway improvements: (1) Restrict parking along the west side of Crenshaw Boulevard north of Pincay Drive-90<sup>th</sup> Street during the Saturday Mid-day peak hour to allow the southbound curb lane to function as a shared through/right-turn lane; and (2) Contribute 18.4% to develop and enhance the City of Inglewood ITS program at this intersection.
- MM L-43. ***Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).*** The Project Applicant shall contribute 2.7% of the total estimated cost to implement the following roadway improvements: (1) Widen the northbound Crenshaw Boulevard

approach to provide two left-turn lanes, two through lanes, and one shared through/right-turn lane; (2) Widen the southbound Crenshaw Boulevard approach to provide one left-turn lane, three through lanes, and two right-turn only lanes; (3) Widen the eastbound Century Boulevard approach to provide two left-turn lanes, three through lanes, and one right-turn only lane; (4) Widen the westbound Century Boulevard approach to provide two left-turn lanes, three through lanes, and one shared through/right-turn lane; and (5) Modify the traffic signal to provide southbound and eastbound right-turn overlapping phases to be operated concurrently during the eastbound and northbound left-turn phases, respectively. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures, and/or other factors such as impacts on parking or adjacent businesses, may cause the lead agency to ultimately conclude that these proposed measures are infeasible.

- MM L-44. *Intersection No. 48: Crenshaw Boulevard/Imperial Highway (City of Inglewood)*. No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-45. *Intersection No. 55: Western Avenue/Century Boulevard (City of Los Angeles)*. The Project Applicant shall contribute 9.2% of the funding towards the installation of the ATSAC at this intersection (as this intersection is not currently operated under the City of Los Angeles' ATSAC system).
- MM L-46. *Intersection No. 56: Vermont Avenue/Manchester Avenue (City of Los Angeles)*. To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute 6.9% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional left-turn lane on the southbound Vermont Avenue approach at Manchester Avenue; and (2) Contribute 6.9% of the total cost to install the ATSAC/ATCS at the Vermont Avenue/Manchester Avenue intersection (as this intersection is not currently operated under the City of Los Angeles' ATSAC system). The resultant southbound approach lane configuration would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane.

## LEVEL OF IMPACT AFTER MITIGATION

### Project Impacts

The Proposed Project will result in significant traffic impacts at six of the 66 study intersections during the weekday AM peak hour, PM peak hour and/or Saturday mid-day peak hour. The recommended

mitigation measures for the impacted intersections include funding contributions towards developing and enhancing the ITS program (i.e., a traffic signal upgrade) at these locations. Traffic signal enhancements such as the City of Inglewood ITS program have been demonstrated to increase the effective intersection capacity by at least ten percent (10%). The project applicant will fund the installation of the traffic signal improvements at the affected intersections to mitigate the project's impact at these locations. Implementation of the mitigation measures identified above is expected to reduce project impacts at the six intersections to less than significant levels as detailed below:

- MM L-1. ***Intersection No. 18: La Brea Avenue/Centinela Avenue (City of Inglewood).*** The proposed mitigation for this intersection is expected to improve the v/c ratio from 1.004 (LOS F) to 0.904 (LOS E) during the weekday AM peak hour. Thus, the weekday AM peak hour impact at this intersection is expected to be mitigated to a less-than-significant level.
- MM L-2. ***Intersection No. 19: La Brea Avenue/Florence Avenue (City of Inglewood).*** The proposed mitigation is expected to improve the v/c ratio from 1.236 (LOS F) to 1.136 (LOS F) during the weekday AM peak hour and from 1.192 (LOS F) to 1.092 (LOS F) during the weekday PM peak hour. Thus, the weekday AM and PM peak hour impact at this intersection is expected to be mitigated to a less-than-significant level.
- MM L-3. ***Intersection No. 22: La Brea Avenue/Century Boulevard (City of Inglewood).*** The proposed mitigation is expected to improve the v/c ratio from 1.001 (LOS F) to 0.901 (LOS E) during the weekday PM peak hour. Thus, the weekday PM peak hour impact at this intersection is expected to be mitigated to a less than significant level.
- MM L-4. ***Intersection No. 25: Prairie Avenue/Florence Avenue (City of Inglewood).*** The proposed mitigation is expected to improve the v/c ratio from 1.056 (LOS F) to 0.956 (LOS E) during the weekday AM peak hour and from 1.045 (LOS F) to 0.945 (LOS E) during the weekday PM peak hour. Thus, the weekday AM and PM peak hour impact at this intersection is expected to be mitigated to a less than significant level.
- MM L-5. ***Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard (City of Inglewood).*** The proposed mitigation is expected to improve the v/c ratio from 1.015 (LOS F) to 0.915 (LOS E) during the weekday PM peak hour and from 1.046 (LOS F) to 0.946 (LOS E) during the Saturday mid-day peak hour. Thus, the weekday PM and Saturday mid-day peak hour impact at this intersection is expected to be mitigated to a less than significant level.
- MM L-6. ***Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).*** The proposed mitigation is expected to improve the v/c ratio from 1.155 (LOS F) to 1.055 (LOS F) during the Saturday mid-day peak hour. Thus, the Saturday mid-day peak hour impact at this intersection is expected to be mitigated to a less than significant level.



One of the impacted intersections is also part of the CMP intersection monitoring program. The above mitigation measures will reduce the Proposed Project's impact at this intersection to less than significant levels based on CMP impact criteria.

### **Cumulative Impacts**

As summarized in the Future Cumulative Conditions section of the Traffic Study, application of the City's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative development of the Proposed Project and the Related Projects are expected to create significant cumulative impacts at 27 study intersections during the weekday AM peak hour, PM peak hour, and/or the Saturday mid-day peak hour (14 of which are located in the City of Inglewood).

The Proposed Project's pro-rata or fair-share contribution to fund improvements at the following three study intersections was calculated at 0.0%:

- Int. No. 12: La Cienega Boulevard/Century Boulevard (City of Los Angeles);
- Int. No. 26: Prairie Avenue/Manchester Boulevard (City of Inglewood);
- Int. No. 41: Crenshaw Boulevard/Slauson Avenue (City of Los Angeles); and

Accordingly, the Proposed Project's cumulative impact at these intersections is not cumulatively considerable and thus less than significant. For the remaining intersections, and except as discussed in further detail below, the Proposed Project's fair-share contribution to fund mitigation measures, which are within the responsibility and jurisdiction of another public agency can and should be implemented by such other public agency, would mitigate the Proposed Project's cumulative impacts to a level that is less than cumulatively considerable. At least three of the proposed mitigation measures, however, may involve significant roadway widening and/or right-of-way acquisition or create economic or other impacts to adjacent uses such that they are ultimately determined to be infeasible by the responsible jurisdiction. Namely these mitigation measures and intersections include the following:

- (L-8) Int. No. 2: Sepulveda Boulevard/Centinela Avenue (City of Los Angeles);
- (L-18) Int. No. 23: Hawthorne Boulevard/Imperial Highway (City of Hawthorne); and
- (L-30) Int. No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).

For these intersections, the cumulative impacts would be considered significant and unavoidable if the recommended mitigation measures are not fully implemented by the respective jurisdiction.

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## IV. ENVIRONMENTAL IMPACT ANALYSIS

### M. PARKING

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#### INTRODUCTION

This Section provides an assessment of the City of Inglewood's Municipal Code parking requirements and the anticipated parking demand for the proposed Hollywood Park Redevelopment Project. The following discussion summarizes, in part, the findings and conclusions from the Shared Parking Analysis for the Hollywood Park Project, prepared by Walker Parking Consultants (September 25, 2007) which addresses the parking demand methodology proposed to be used in the Mixed-Use zone of the Proposed Project. This Section also includes a discussion of the parking requirements for the residential neighborhoods of the Proposed Project as provided in the Hollywood Park Specific Plan. The Shared Parking Analysis is included in its entirety into Appendix G-2, of this Draft EIR.

#### ENVIRONMENTAL SETTING

##### City of Inglewood Parking Requirements

Inglewood Municipal Code Article 19 – Parking Regulations sets forth current parking supply requirements for the City of Inglewood. In general, parking requirements developed by cities consider each land use to stand alone, without consideration for the possibility of sharing parking with surrounding land uses. The City of Inglewood's off-street parking regulations for the applicable residential and commercial land uses that could be included within the proposed Hollywood Park Redevelopment Project are provided below:

##### *Residential Parking Requirements*

Pursuant to Section 12-43 of the Inglewood Municipal Code, the number of off-street automobile parking spaces provided for each of the following uses shall be not less than the following requirements:

- One or Two Dwelling Units on One Lot. Two fully enclosed parking spaces for each unit.
- Three or More Dwelling Units on One Lot. Two fully enclosed parking spaces for each unit. Any combination of rooms, so arranged that they can be easily converted into separate living quarters, shall be counted as an additional dwelling unit.
- Visitor Parking. For all multiple-unit residential facilities having six or more units, one additional parking space for visitors shall be provided on-site per every three units.

### *Commercial Parking Requirements*

Off-street parking requirements for commercial land uses are established in Section 12-44 of the Inglewood Municipal Code. The following list identifies the aggregate amount of off-street parking spaces provided in connection with each of the following commercial uses that could potentially be developed within the proposed Hollywood Park Redevelopment Project:

- General Business, Retail or Wholesale. For facilities not larger than eighteen thousand square feet in floor area: one parking space for each three hundred square feet of gross floor area. For facilities larger than eighteen thousand square feet in floor area: sixty parking spaces, plus one parking space for each additional four hundred square feet of gross floor area in excess of eighteen thousand square feet of floor area.
- Offices, Business and Professional, Other than Medical and Dental. One space for each three hundred square feet of gross floor area.
- Bakeries, Confectioneries, Take-out Restaurants (where food is not consumed on the premises). One parking space for each three hundred square feet of gross floor area.
- Banks, Savings-and-loans, or Check-cashing Stores. One space for each one hundred fifty square feet of gross floor area.
- Health Clubs and Studios for Music, Dance, Martial Arts and Similar Activities. One parking space for each one hundred fifty square feet of gross floor area.
- Hotels or Motels. For facilities having more than one hundred bedrooms: one hundred two parking spaces, plus one parking space for each additional two bedrooms or any other room that can be used for sleeping purposes. Restaurant and meeting facilities shall be provided with additional parking spaces as required for each respective use.
- Markets: Food and Liquor Stores. One space for each one hundred fifty square feet of gross floor area.
- Restaurants, Bars and Cafes. One parking space for each one hundred fifty square feet of gross floor area.
- Service Shops (printing, cleaning, repair and the like). One parking space for each three hundred square feet of gross floor area.
- Shopping Centers (commercial multiple tenant facilities where parking is not determined by the respective requirements of each individual tenant). For centers larger than

fourteen thousand square feet in floor area: sixty parking spaces, plus one additional parking space for each additional four hundred square feet of gross floor area in excess of fourteen thousand square feet of floor area.

- Theaters. One parking space for each five fixed seats or each thirty-five square feet of floor area (exclusive of halls, stairs, lobby, theater offices or restrooms).
- Card Clubs. One parking space for each fifty square feet of gross floor area, excluding kitchens, for facilities not exceeding twenty-five thousand square feet in area; and one parking space for each seventy-five square feet of gross floor area for any floor area in excess of twenty-five thousand square feet.

## ENVIRONMENTAL IMPACTS

The parking requirements for the Mixed-Use zone of the Project (including guest/visitor parking required for residential units that could be built in the Mixed-Use zone) are proposed to utilize a shared parking methodology. The residential zone parking for the Project will be separate from the Mixed-Use zone and will not use a shared parking methodology. Rather, the residential parking provided will be similar to the requirements under the Inglewood Municipal Code, with some modifications.

### Shared Parking Methodology

Off-street parking requirements found in many municipal codes, including the City of Inglewood, are developed for stand alone residential or commercial uses without consideration for the possibility of shared parking with surrounding land uses. Shared parking is the use of a parking space to serve two or more individual land uses without conflict or encroachment. The ability to share parking spaces is the result of two conditions:

1. Variations in the accumulation of vehicles by hour, by day, or by season at the individual land uses, and
2. Relationships among the land uses that result in visiting multiple land uses on the same auto trip.

The key goal of a shared parking analysis is to find the balance between providing adequate parking to support a development from a commercial standpoint while minimizing the negative aspects of excessive land area or resources being devoted to parking.

One of the most popular real estate trends is known as “place making,” the development of town centers and urban villages with mixed uses in pedestrian-friendly settings. Another significant trend today is locating development consistent with established transit corridors and bus lines. With housing located

within walking distance, or a short bus ride from light-rail transit, some trips and, in turn, some parking spaces can be eliminated. These trends reduce the amount of required parking.

The Urban Land Institute (“ULI”) and the Institute of Transportation Engineers (“ITE”) have released publications that list parking ratios for many types and subtypes of land uses. The Urban Land Institute first published Shared Parking in 1983. This publication has been used ever since to explain the concept of shared parking and to create models that forecast peak parking conditions for mixed-use developments, and/or urban settings. Walker Parking Consultants contributed to that original publication and also led the team that researched and wrote Shared Parking, 2<sup>nd</sup> Edition, published in 2005. ULI also provides case studies within Chapter 5 of the Shared Parking publication. These case studies perform a shared parking analysis on existing sites throughout the United States to support the theory of shared parking and the methodology developed by ULI to forecast future parking demands in a shared parking environment and they validate the use of shared parking to reduce otherwise applicable parking standards. The sites in the study include: the Puente Hills Mall, Fashion Island (Newport Beach), Veteran Plaza (Tampa, FL), Long Beach Towne Center, Covina Town Square, Burbank Empire, Westfield Promenade (Woodland Hills), Ahwatukee Foothills Towne Center (Phoenix, AZ), Irvine Spectrum, Reston Town Center (Reston, VA), Easton Town Center (Columbus, OH), Block at Orange, and the Village Glen Plaza (Westlake Village, CA). The specific shared parking methodology that was utilized to estimate the Proposed Project’s peak parking demand is discussed in further detail under Project Impacts subheading below.

### **Thresholds of Significance**

A project would normally have a significant impact on parking if the project provides less parking than required by the City’s development standards, or less parking than needed as determined through an analysis of demand from the project. Based on this guidance, the Proposed Project would result in a significant impact on parking if the number of parking spaces required to accommodate Project activities exceeds the number of parking spaces provided.

### **Project Impacts**

#### *Construction*

There would be no adverse impacts to existing street parking bordering the Project Site during construction. Due to the large size of the Project Site, construction workers will park in designated areas on the Project Site. During the grading and excavation phase of the Proposed Project, while Casino operations are still active, temporary parking areas will be created adjacent to the Casino for its patrons. Once grading/excavation work is complete adjacent to the Casino site, permanent parking areas will be designated during the construction phase of the Proposed Project. Adequate parking spaces will be maintained throughout grading/excavation and construction, therefore, impacts due to construction will be less than significant.

## *Operation*

### *Mixed-Use Zone Parking Requirement*

Parking for the commercial, entertainment, hotel and retail land uses will be provided with a combination of surface parking lots, structured parking lots and on-street parking spaces within the designated mixed-use land use plan area (the “Mixed-Use zone”) pursuant to the requirements and standards established in the Hollywood Park Specific Plan. Parking in the Mixed-Use zone will be provided on a shared basis, based upon the mix of uses and estimated parking demands. The details of the shared parking methodology are discussed later in this section.

With respect to the structured parking lots<sup>1</sup> to meet the Proposed Project’s demand, as shown on the Conceptual Circulation Plan in Figure II-8, Parking Structure 1 (“P1”) may contain up to approximately 2,199 stalls. Parking Structure 2 (“P2”) may contain up to approximately 1,121 stalls. The Casino Garage (“P3”) may contain up to approximately 2,005 stalls. Parking Structure 4 (“P4”) may contain up to approximately 1,883 spaces. Parking Structure 5 (“P5”) may contain up to approximately 570 parking stalls. In total, the Mixed-Use zone could contain parking structures and lots that could provide up to 7,778 parking spaces. However, it is anticipated that less parking will actually be demanded by the commercial, entertainment, hotel and retail land uses. The ultimate number of parking spaces developed will depend upon the land uses built and will be determined at the time of Plot Plan Review as provided in the Hollywood Park Specific Plan. This parking is separate and independent of the residential parking for residential units outside the Mixed-Use zone.

Each of the parking garage structures will be developed as open-air parking structures with 42”-high spandrel walls to block light trespass from vehicle headlights. Parking Structure sizes may be increased as much as twenty percent to reflect actual parking demand adjacent to the location of the structure.

### *Residential Parking Requirement*

Residential parking (including guest parking) will be located within the residential land use areas, and in the Mixed-Use Zone to the extent residential units are located there.

Pursuant to the Hollywood Park Specific Plan, the minimum number of off-street parking spaces required for resident parking in the residential zone are: (1) two spaces for the Single-Family Housing Type, (2)

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<sup>1</sup> Individual parking structures will be constructed on an as-need basis to meet the shared parking demands of the proposed mixed-use development. It is anticipated that the actual parking demand identified herein may vary by up to 20% at different stages of buildout based on the shared parking demand analysis model to be established in the Specific Plan. Consequently, the size of each individual structure may vary to reflect parking demand. For purposes of a worst-case air quality and noise analysis, this Draft EIR assumes each structure could be as large and as tall as possible.

1.5 spaces for studio and one-bedroom units for Townhome and Wrap/Podium Housing Types, and (3) two spaces for units with 2 or more bedrooms for the Townhome and Wrap/Podium Housing Types. With respect to guest/visitor parking within the residential zone, the Hollywood Park Specific Plan provides one guest/visitor space for three dwelling units, except that single-family homes on 3,500 sf lots shall have one guest/visitor spaces per dwelling unit. These spaces may be located within a parking structure, parking lot or on-street.

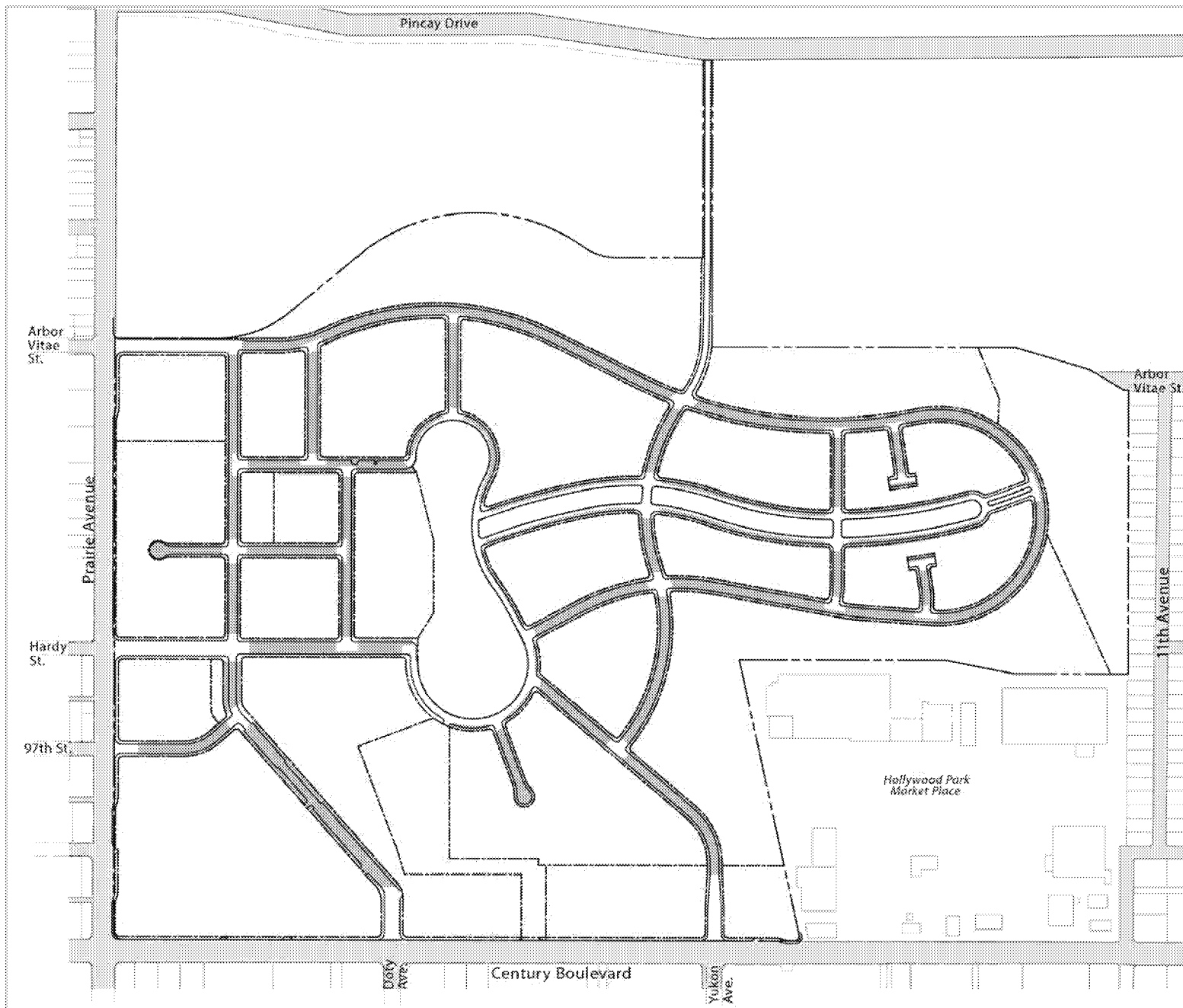
Pursuant to the Hollywood Park Specific Plan, studio and 1-bedroom units in the Mixed-Use zone shall have 1.5 spaces per unit, and units with 2 or more bedrooms shall have 2 spaces per unit. Residential parking for each unit within the Mixed-Use zone would be cordoned off from commercial parking areas to provide controlled access for residents for security purposes. The minimum number of guest/visitor spaces for residential units in the Mixed-Use zone will be determined by the shared parking analysis.

Parking for residential dwelling units may utilize on-street or tandem parking, and guest/visitor parking may utilize on-street parking, although no street parking will be provided on major arterial streets (Century Boulevard and Prairie Avenue) adjacent to the Project Site. However, some new streets created within the Proposed Project can accommodate on-street parking. Figure IV.M-1, Permitted Street Parking, identifies internal roadways located within the Proposed Project that can accommodate on-street parking. The specific location and number of on-street parking spaces would be dependent upon final design and approval of subdivision maps where location of driveways, fire hydrants and other infrastructure details are taken into consideration. Furthermore, convenient short-term street parking would be made available adjacent to the Proposed Project's retail and community serving uses.

Depending upon the actual bedroom counts that are developed in the residential dwelling units, it is estimated that the Project Site could contain up to approximately 7,700 parking spaces in the residentially-zoned areas of the Project Site to accommodate the parking demand generated by residents on the Project Site. This includes up to approximately 6,000 required resident parking spaces (typically in garages), 700 on-site parking spaces, and 1,000 on-street parking spaces. These parking spaces are created in the residentially zoned areas of the Project Site and are in addition to the number of spaces created for the retail, commercial, entertainment, casino, residential, and hotel land uses as described above in "Mixed-Use Zone Parking Requirements." Again, it should be noted that the precise number of resident and guest spaces for the residential units and the location of these spaces will be determined at the time of Plot Plan Review per the requirements of the Development Standards in the Hollywood Park Specific Plan. The Specific Plan's parking standards are designed to meet the parking demand generated by the housing product types proposed for the Project, which tend to generate a smaller number of residents due to the size of the units and the bedroom counts. As a result, the project's parking demands for the residential land uses would be met and impacts would be less than significant.

#### *Civic Zone Parking Requirement*

The precise number of parking for the 4-acre civic site will be determined at the time of Plot Plan Review and will depend upon the ultimate use selected for the site.



Source: Hollywood Park Specific Plan, William Hezmalhalch Architects, July 1, 2008.



**CHRISTOPHER A. JOSEPH & ASSOCIATES**  
Environmental Planning and Research



Figure IV.M-1  
Permitted Street Parking



*City of Inglewood Municipal Code*

The City of Inglewood does not have any parking requirements that apply to large mixed-use communities such as the proposed Hollywood Park Project. Because the Proposed Project involves a town center or urban village type development with mixed uses and pedestrian-friendly walkability standards, the application of the City's parking code requirements for the proposed mixed-use retail plan area would result in an oversupply of parking. Nevertheless the City of Inglewood's parking requirements for the stand-alone land uses that are proposed as part of the Hollywood Park Redevelopment project are provided in Table IV.M-1, below.

**Table IV.M-1  
City of Inglewood Parking Requirements**

<b>Land Use</b>	<b>Size (sq. ft./units)</b>	<b>Parking Requirements</b>	<b>Minimum Requirement</b>
<b>Residential <sup>a</sup></b>			
Dwelling Units	2,995 DU	2/DwellingUnit	5,990
Guest <sup>b</sup>	2,995 DU	1/3 Units	998
<i>Subtotal Residential</i>			<b>6,988</b>
<b>Mixed-Use Program</b>			
Retail	468,400	60+ 1/400 SF GFA in excess of 14,000 GFA	1, 231
Restaurant (Sit Down) <sup>c</sup>	49,100	1/150 SF GFA	327
Restaurant (Fast Food) <sup>c</sup>	42,500	1/300 SF GFA	142
Cinema	60,000 3,000 seats	1/5 Seats or 1/35 SF GFA in theaters	600
Casino	120,000	1/75 SF GFA	1,600
Office	75,000	1/300 SF GFA	250
HOA Facility	10,000	1/5 Seats or 1/35 SF GFA in seating area	286
Hotel (rooms)	210,000 (300 rooms)	102 for first 100 rooms plus 1 per 2 rooms over 100	202
Hotel (Meeting Space)	20,000	1/5 Seats or 1/35 SF GFA in seating area	571
<i>Subtotal Mixed-Use</i>			<b>5,209</b>
<i>Notes:</i>			
<i><sup>a</sup> Includes the parking requirements for any multiple family residential units that may be located within the mixed-use plan area.</i>			
<i><sup>b</sup> Assumes that all units are multiple family.</i>			
<i><sup>c</sup> Assumes that all units are multiple family.</i>			
<i>Source: City of Inglewood Municipal Code, WMS, 2007, Walker Parking, 2007.</i>			

Based on the code requirements for the residential land uses, it is roughly estimated approximately 6,988 parking spaces will be required to serve the residential land uses, including residential guest parking requirements. The Specific Plan requirements would be comparable, but would also permit the use of

tandem and on-street parking for some required spaces. The actual number of residential parking spaces will be determined on the number and type of dwelling units developed and the actual bedroom counts for the units developed. Resident and guest parking will be provided pursuant to the development standards of the proposed Specific Plan.

As shown in Table IV.M-1, the application of the code required parking standards for the mixed-use portion of the Proposed Project would yield a requirement of approximately 5,209 parking spaces. This estimate is based on a rough approximation of the retail shopping center and retail characteristics provided by the Project Applicant as a sample development scenario. It should be noted, however, that the actual size and characteristics of the proposed retail plan is anticipated to vary depending on market forces and the procurement of individual tenant occupancies. Therefore, the parking requirements identified in Table IV.M-1 are provided for general comparative purposes.

### ***Shared Parking Demand***

Based on a review of several case studies for mixed-use projects that are of a similar scale and characteristics to the Hollywood Park Project, the code required parking calculation presented above would result in an overdevelopment of the actual parking supply for the Proposed Project. For this reason, as part of the Plot Plan review for the Project, the Project Applicant will provide a shared parking analysis for the Proposed Project based upon the actual quantity and type of land uses to be developed. A preliminary shared parking analysis for the Proposed Project was prepared utilizing the most up-to-date information from the second edition of *Shared Parking*. Data specific to the City of Inglewood and the location Hollywood Park have been entered into the model, and site and market specific variations taken into consideration to arrive at the number of parking spaces required to serve the development. The shared parking summary provided in this section is an example of a prototypical program for the Mixed-Use zone. Actual program information, including types of land uses and quantity of land uses, would be included as part of the Plot Plan for the Mixed-Use zone once the exact nature of the types of tenants is known. The land uses and quantities contained in the tables below are, therefore, not the precise program. However, the methodology used to derive the parking demand for this “sample program” would be similar to the methodology used for the shared parking demand analysis that will be submitted as part of the Plot Plan package.

#### **Step 1 – Project Data**

The preliminary analysis was based on the quantity of square footages for the retail, restaurant, quick-serve restaurant, office and meeting space, cinema seat count, casino historic data, and the guest parking for residential units (if applicable). The shared analysis does not consider the parking supply set aside for Hollywood Park single-family, condominium and townhome residents, located in the residential land use zone, or the parking demand that they generate.

Other project data that has been considered includes:

- The site is currently along two major arterials that offer bus service.
- Modal split for employees ranges from 80% to 90% based on mode of transportation to work data for Inglewood paired with professional judgment for each land use type.
- The overall redevelopment will include roughly 3,000 residential units providing a large captive demand for the retail, residential, grocery, and cinema on site.
- The parking supply for the mixed-use residential units will be fenced-off through the use of access control equipment and will be reserved on a space by space basis.
- Valet service may be provided in locations near the retail/restaurant core, and the entrance of the Casino.
- The project applicant intends to provide free parking initially, but has set up curb cuts, etc. for the future placement of access control equipment and cashiers.

#### Step 2 – Select Parking Ratios

The parking ratios that project the peak parking demand for Hollywood Park were derived from ULI. The ULI ratios are based on occupancy counts from stand-alone land uses throughout the U.S. (updated in 2005). The ULI ratios also draw a distinction between employees (long-term parkers) and visitors or patrons (short-term parkers). Most land uses also generate different parking demands on weekends than weekdays, so ULI has identified different parking demand ratios for each.

#### Step 3 – Select Factors & Analyze Patterns

For both weekdays and weekend days ULI also provides adjustment factors for each hour of the day. These factors are based on 100% being the peak parking required by that land use. Any land use may reach 100% at more than one point during the day. The shared parking methodology works when the square footages for all land uses are combined with the parking ratios and these hourly factors. Any given land use may generate a large amount of parking at its peak hour while another generates at only 20% during that time.

#### Step 4 – Critical Needs Periods

The critical needs periods are driven in general from the largest quantity of land use or the largest parking requirement before any reductions are made. In that case the model adjusts to the retail or casino activity at the site. The parking ratio was developed through study of the existing casino. Casino activity peaks at 2:00 p.m. based on the Off-Track Betting function of the site, it then drops off for several hours until the Card Club picks up. Retail activity peaks from 2:00 p.m. to 3:00 p.m. on the weekends, tying in with the casino peak period. Although restaurant parking demand peaks in the evening, the peaks for casino and

retail pull the overall demand away from the evening (dinner) restaurant peak. Based on the ULI model the peak hour parking occurs at 2:00 p.m. on a weekend in late December. Parking will again be impacted at 6:00 p.m. on weekends when the cinema picks up and retail and restaurant are still generating significant activity.

#### Step 5 – Modal Split Adjustment

Modal split is the adjustment that accounts for modes of transportation that a user group would likely use other than single-occupant vehicles such as rail, bus, carpooling, walking etc. Data for the City of Inglewood was found on the U.S. Census website. Data from 2000 indicated that roughly 80% of workers drove alone, and roughly 10% carpoled. These are the only two modes of transportation that would generate parking on-site. Because a carpool consists of at least two persons, that land use demand only generates half as many vehicles, or 5%. When combined we find a modal split of 85% of employees arriving by cars. This split is reasonable because of site and market specific considerations including proximity to transit, transit ridership statistics, and proximity to a large number of residential units.

#### Step 6 – Noncaptive Adjustment

A non-captive adjustment accounts for a parking reduction for users of the site already parked and accounted for by one land use utilizing another land use on-site. For Hollywood Park, employees of the office building may choose to take lunch in one of the restaurants on-site, thus generating no additional parking demand. Alternatively a resident of Hollywood Park may be employed by one of the businesses on the site. These adjustments are specific to the site. This factor is applied in a judicious manner so not to create a parking shortfall. Recognizing that any development without adequate parking may not generate business to its potential, the non-captive reduction was lessened to assure adequate parking.

#### Step 7 – Required Parking

Using the information supplied, information gathered, and appropriate adjustments for this development and the surrounding area, Walker calculated the shared peak parking demand. Tables IV.M-2 and IV.M-3 show the weekday and weekend shared peak parking demand for all user groups and land uses on site other than condominium and townhome residents. Based on the findings in Table IV.M-2 and Table IV.M-3, the Proposed Project would need to supply 4,922± parking spaces (weekend peak) in the shared lot/garage, and an additional 404 controlled parking spaces for the condominiums and townhomes in the mixed use plan area. Under the program data supplied and the parking management scenario provided by the Project Applicant, Walker found that a total of 5,326± parking spaces would be needed to sufficiently supply parking at the peak period.

**Table IV.M-2  
Shared Parking Demand – Overall Peak Weekday  
Sample Program Tenant Mix**

<b>Hollywood Park Land Use/User Group</b>	<b>Quantity</b>	<b>Weekdays Base Ratio/Unit</b>	<b>Month Adj. Late Dec.</b>	<b>Pk Hr Adj. 2:00 P.M.</b>	<b>Non Captive Daytime</b>	<b>Drive Ratio Daytime</b>	<b>Late Dec. 2:00 P.M.</b>
Community Shopping Ctr	339,380	2.90 / ksf GLA	80%	100%	95%	90%	673
Employee		0.70	90%	100%	97%	80%	166
Fine /Casual Dining	49,100	15.25 / ksf GLA	95%	65%	97%	95%	426
Employee		2.75	100%	90%	97%	85%	100
Quick Serve Restaurant	42,500	12.75 / ksf GLA	95%	90%	50%	90%	209
Employee		2.25	100%	95%	95%	80%	69
Cineplex	3,000	0.19 / seat	100%	75%	95%	90%	366
Employee		0.01	100%	60%	100%	80%	14
Hotel	300	0.90 / room	100%	70%	100%	100%	189
Hotel Meeting/Banquet	20,000	30.0 / ksf GLA	100%	65%	60%	75%	176
Employee	300	0.25 / room	100%	100%	100%	80%	60
Community Room <sup>a</sup>	5,000	30.00 GLA	100%	65%	60%	75%	44
Residential Guest	202	0.15 / unit	100%	20%	100%	97%	6
Office (25k to 100k sq.ft.)	75,000	0.30 / ksf GFA	80%	100%	100%	100%	18
Employee		3.27	80%	100%	95%	95%	177
Grocery	53,200	4.00 GLA	100%	95%	85%	90%	155
Employee		0.70	100%	100%	95%	80%	28
Casino	120,000	10.94 GLA	100%	79%	100%	100%	1035
Employee		2.79	100%	93%	100%	85%	264
Market Square	75,820	3.20 GLA	100%	100%	100%	85%	207
Employee		0.80	100%	100%	100%	80%	49
<b>Subtotal Customer/Guest Spaces</b>							<b>3,315</b>
<b>Subtotal Employee/Resident Spaces</b>							<b>867</b>
<b>Total Parking Spaces</b>							<b>4,182</b>
<b>Percent Reduction</b>							<b>40%</b>

*Note: The sample program above assumes a maximum of 202 residential units in the Mixed Use Zone area, typically over the retail uses. As such, these units would generate parking demand in addition to this total of 4,182. If all of the 202 units were two bedroom units, an additional demand of 404 spaces (202 X 2 spaces per unit) would be required, bringing the total spaces to 4,586 (4,182+404).*

<sup>a</sup> *For purposes of the Shared parking demand analysis Walker Consultants assumed 5,000 square feet of the HOA Community Room would be occupied floor area.*

*Source: Walker Parking Consultants, 2007.*

**Table IV.M-3  
Shared Parking Demand – Overall Peak Weekend  
Sample Program Tenant Mix**

Hollywood Park Land Use/User Group	Quantity	Weekends Base Ratio/Unit	Month Adj. Late Dec.	Pk Hr Adj. 6:00 P.M.	Non Captive Evening	Drive Ratio Evening	Late Dec. 6:00 P.M.
Community Shopping Ctr	339,380	3.20 / ksf GLA	80%	80%	95%	90%	594
Employee		0.80	90%	85%	97%	80%	161
Fine /Casual Dining	49,100	17.00 / ksf GLA	95%	90%	95%	95%	644
Employee		3.00	100%	100%	97%	85%	121
Quick Serve Restaurant	42,500	12.00 / ksf GLA	95%	85%	50%	90%	185
Employee		2.00	100%	90%	95%	80%	58
Cineplex	3,000	0.26 / seat	100%	70%	95%	95%	493
Employee		0.01	100%	100%	100%	80%	24
Hotel	300	1.00 / room	100%	85%	100%	100%	255
Hotel Meeting/Banquet	20,000	30.0 / ksf GLA	100%	100%	70%	75%	315
Employee	300	0.18 / room	100%	60%	100%	80%	26
Community Room <sup>a</sup>	5,000	30.00 GLA	100%	100%	70%	75%	79
Residential Guest	202	0.15 / unit	100%	60%	100%	100%	18
Office (25k to 100k sq. ft.)	75,000	0.03 / ksf GFA	80%	5%	100%	100%	0
Employee		3.33	80%	5%	95%	95%	1
Grocery	53,200	4.30 GLA	100%	80%	85%	90%	140
Employee		0.80	100%	85%	95%	80%	28
Casino	120,000	12.03 GLA	100%	89%	100%	100%	1,279
Employee		2.71	100%	87%	100%	90%	255
Market Square	75,820	3.60 GLA	100%	80%	100%	90%	197
Employee		0.90	100%	85%	100%	85%	49
<b>Subtotal Customer/Guest Spaces</b>							<b>4,199</b>
<b>Subtotal Employee/Resident Spaces</b>							<b><u>723</u></b>
<b>Total Parking Spaces</b>							<b>4,922</b>
<b>Percent Reduction</b>							<b>32%</b>
<p><i>Note: The sample program above assumes a maximum of 202 residential units in the Mixed Use Zone area, typically over the retail uses. As such, these units would generate parking demand in addition to this total of 4,182. If all of the 202 units were two bedroom units, an additional demand of 404 spaces (202 X 2 spaces per unit) would be required, bringing the total spaces to 5,326 (4,922+404).</i></p> <p><sup>a</sup> For purposes of the Shared parking demand analysis Walker Consultants assumed 5,000 square feet of the HOA Community Room would be occupied floor area.</p> <p>Source: Walker Parking Consultants, 2007.</p>							

Step 8 – Critical Needs / Management Concerns

Currently the critical needs period is based on weekend, daytime demand generated by the casino and retail on site. Two potential tenants may have a concern about how sharing parking with other land uses

will affect the parking available for their patrons. These two uses are cinema and grocery. Based on modal split and non-captive adjustments Walker found a peak parking demand for the cinema of 691 and for the grocery store of 208.<sup>2</sup> The proximate supply proposed for both of these land uses will be more than adequate to accommodate their parking demand at their peak periods.

Walker was asked to provide the Project Applicant with additional information concerning how the peak hour found through our analysis compares to other time periods throughout the day and year. Data utilized for this analysis can be found in Appendix B to the Shared Parking Study contained in Appendix G-2 to this EIR. The overall shared parking could be reduced by roughly 100 spaces while only causing a projected shortfall in December and late December, and for only 2:00 p.m., 6:00 p.m. and 7:00 p.m. This shortfall could possibly be alleviated through the use of stacking vehicles utilizing valet parking. There is also the possibility that over time visitors to the site will begin to adjust to the site and utilize the available transit without affecting the vitality of the development.

Based on the sample program provided, the shared parking analysis projects a total demand of 5,326± parking spaces to sufficiently supply parking in the Mixed-Use zone at the peak period.

As part of the Plot Plan Review Process, an analysis of driveways in the Mixed-Use zone would be provided to ensure that adequate vehicle queuing area would be provided to accommodate the anticipated demand. Additionally, vehicle queuing within the City's right-of-way is not anticipated to occur during peak hours due to the design of the Project's Circulation Plan. Therefore, impacts due to vehicle queuing would be less than significant.

Through the parking requirements to be established in the Specific Plan, the Proposed Project would provide adequate parking in accordance with the actual parking demands during each phase of development and occupancy. The Proposed Project may include up to 7,778 structured parking spaces in Parking Structures 1 through 5 for the Mixed-Use zone, while the residential parking on the residential land uses would be parked according to the standards in the Hollywood Park Specific Plan and could include up to 7,700 spaces depending on final bedroom counts of the residential units developed. Application of both mixed-use and residential parking standards for the Proposed Project would meet the parking demand generated by the Project. As a result, all of the project's parking demands would be met within the Project Site, and as such, impacts to parking would be less than significant.

### **Land Use Equivalency Program Impacts**

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

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<sup>2</sup> The peak periods for all months and from 6:00 a.m. to 12:00 a.m. for the peak month are provided in Appendix B to the Walker Parking Study. The Walker Parking Demand Analysis is provided in Appendix G-2 to this Draft EIR.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's street configurations, or related use of subterranean parking. Street parking would be provided in a manner similar to that of the Proposed Project. As with the Proposed Project, the Equivalency Program would provide residential and mixed-use parking at the same standards. For any additional retail, office/commercial and hotel area, the Project Applicant would submit a shared parking study at the time of Plot Plan Review to generate the parking demand for the Project. For the additional residential units, the Project Applicant would apply the parking standards in the Hollywood Park Specific Plan to generate the residential (and guest) parking demands for the Project. The Plot Plan would indicate how the Project has met this parking demand and would be reviewed and approved for efficacy. As with the Proposed Project, compliance with the Hollywood Park Specific Plan and Shared Parking Study will ensure that there is sufficient parking to meet the demand.

All Project Design Features and/or recommended mitigation measure to minimize parking impacts under the Proposed Project would be implemented under the Equivalency Program. Consequently, as with the Proposed Project, with implementation of applicable mitigation measures, parking impacts attributable to the Equivalency Program would be less than significant.

## **CUMULATIVE IMPACTS**

It is anticipated that development of the related projects would occur in conformance with the applicable regulations, and other projects would not utilize the same parking facilities as the Proposed Project. The Proposed Project's parking demand would be met on site. Four related projects are within close enough proximity to the Project Site that they could potentially increase the cumulative demand for parking within the immediate parking area. These projects include (1) the Forum Site (Related Project I-17), a 250,000 square foot retail center with 1,000 dwelling units; (2) the Homestrech at Hollywood Park (Related Project I-19), a 796,970 square foot retail center; (3) the Prairie Promenade (Related Project I-5), a 97,490 square foot retail center; and (4) the Inglewood Promenade (Related Project I-1), a 1,792,472 square foot retail center. Similar to the Proposed Project, each of these projects are expected to provide sufficient parking space to meet the demand for parking, such that spill-over or unplanned shared parking practices would not occur. Cumulative parking impacts would therefore be less than significant.

Impacts pertaining to queuing are site-specific impacts. Thus, impacts associated with access and queuing would not contribute to a cumulative impact.

## **PROJECT DESIGN FEATURES**

PDF M-1. The Proposed Project shall be developed in conformance with the Parking Standards in the Hollywood Park Specific Plan to meet the parking demand of the Proposed Project.



## **MITIGATION MEASURES**

- MM M-1. At the time of Plot Plan review, the Project Applicant shall provide a Shared Parking Study with the parking requirements for the Mixed-Use zone on the Project Site and the plan will show where the parking spaces are provided on the site in the Mixed-Use zone.

## **LEVEL OF SIGNIFICANCE AFTER MITIGATION**

The project's parking impact would be less than significant after mitigation.

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## V. GENERAL IMPACT CATEGORIES

### A. SUMMARY OF UNAVOIDABLE IMPACTS

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

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

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## V. GENERAL IMPACT CATEGORIES

### B. GROWTH INDUCING IMPACTS

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

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

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

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

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

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

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

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

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

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

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## V. GENERAL IMPACT CATEGORIES

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

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

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

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

#### **AGRICULTURAL RESOURCES**

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

#### **BIOLOGICAL RESOURCES**

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

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

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

## **MINERAL RESOURCES**

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

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

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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

### A. INTRODUCTION

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#### INTRODUCTION

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

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

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

#### ALTERNATIVES REJECTED AS BEING INFEASIBLE

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

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



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

## **PROJECT OBJECTIVES**

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

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

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

## OVERVIEW OF SELECTED ALTERNATIVES

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

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

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

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

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

### **Analytical Assumptions and Methodology**

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

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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

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

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

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

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

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

#### **Aesthetics**

##### *Views and Urban Design*

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

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

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

#### *Light and Glare*

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

#### *Shade and Shadow*

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

### **Air Quality**

#### *Construction*

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

#### *Operation*

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

threshold for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub> and PM<sub>10</sub> emissions. As shown in Section IV.B, Air Quality, the existing uses currently generate 153 lbs/day of VOC, 105 lbs/day of NO<sub>x</sub>, 1,962 lbs/day of CO, 60 lbs/day of PM<sub>2.5</sub> and 309 lbs/day of PM<sub>10</sub>. Comparatively, these emissions represent between 31% and 67% of the emissions estimated to be generated by the Proposed Project. Even though the No Project Alternative produces fewer operational emissions than the Proposed Project, if the No Project Alternative is compared to the thresholds of significance, it would exceed the SCAQMD thresholds. Therefore, although no new impact would occur, the No Project Alternative would result in significant and unavoidable operational air quality impacts on a stand-alone basis.

### **Geology and Soils**

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

### **Hazardous Materials and Risk of Upset**

#### *Construction*

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

#### *Operation*

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

## **Cultural Resources**

### *Cultural Resources Records Search*

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

### *Historical Resources*

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

## **Hydrology/Water Quality**

### *Construction*

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

### *Operational*

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



## Noise

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

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

## Population, Housing, and Employment

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

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

## **Land Use and Planning**

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

## **Public Utilities**

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

### *Water*

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

### *Wastewater*

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

### *Energy*

#### Electricity

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

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

### Natural Gas

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

### *Solid Waste*

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

### **Public Services**

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

### *Police Protection*

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

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

#### *Fire Protection*

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

#### *Schools*

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

#### *Parks and Recreation*

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

### *Libraries*

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

### **Traffic and Transportation**

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

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

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

### **Parking**

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

## Conclusion

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

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

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

<b>Project Objectives</b>	<b>Assessment of the Alternative to Meet Objectives</b>
1. To contribute to the revitalization of the City of Inglewood by providing an example of "smart-growth" infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space.	The No Project Alternative would not meet this objective as it would not result in any redevelopment on the Project Site.
2. To provide an economically viable project that promotes the City's economic well-being by significantly increasing property and sales tax revenues and providing high-quality retail uses and the opportunity for transient occupancy tax.	The No Project Alternative would involve the retention of the existing Hollywood Park Racetrack and Casino which contributes to the City's sales tax and OTB revenue. While the No Project Alternative may prove economically viable for the near future, racetrack revenues and attendance have been declining over time and the racing industry may or may not support the continued operation of the Hollywood Park Racetrack in the long-term.
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.	The No Project Alternative would be consistent with this project objective, as the Casino and Gambling facility would continue to operate.
4. To provide land for a civic/public use.	The No Project Alternative would not meet this objective in the same manner as the project. The existing Hollywood Park Racetrack and Casino are however a regional recreational land use that is enjoyed by the public.
5. To create exciting community park and open space areas, that exceed the City's existing General Plan goals of one acre per 1,000 residents, in	The No Project Alternative would not create any new community park and open space areas. Therefore this

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

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**VI. ALTERNATIVES TO THE PROPOSED PROJECT**  
**B.2 NO PROJECT ALTERNATIVE - REASONABLY FORESEEABLE**  
**FUTURE DEVELOPMENT (FOOTBALL STADIUM/CASINO)**  
**ALTERNATIVE**

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This Alternative evaluates a theoretical scenario in which the Proposed Project does not go forward, but an alternative project consistent with the underlying zoning regulations is developed. The development of an athletic stadium is considered a reasonably foreseeable development because (1) it is consistent with the current zoning designation, and (2) it represents a development proposal that was previously proposed and analyzed in an EIR in 1995. For purposes of this analysis, the following project defining features and environmental impact analysis (though modified to reflect current conditions), are generally adapted from the Hollywood Park Athletic Stadium EIR (SCH#95-051042), dated September 6, 1995.

The Athletic Stadium Alternative would add a state-of-the-art venue for professional football to the City of Inglewood. This Alternative would include the construction and operation of an athletic Stadium for professional and collegiate football, professional soccer, and other special events. Under the Stadium Alternative, the Racetrack would be demolished, but the Casino would be retained on the Project Site.

Stadium Operations

The operating hours of the Stadium would vary depending on the schedules of the different teams using the facility and the time of year. Typically, events at the Stadium would take place during a portion of the day, such as the afternoon or evening. It is estimated that the facility would be in use for events approximately 55 days per year. Major events that would take place at the Stadium include professional and collegiate football. These events would take place on Saturdays for college games and primarily on Sundays for professional games (See Table VI.B.2-1: Stadium Event Profile).

To provide for television broadcast to the east coast, weekend games would ordinarily begin at 1:00 p.m. Additionally, the Stadium could host a limited number of Monday Night Football games or Saturday/Thursday night games during a given year. Such games would ordinarily begin at 6:00 p.m. Other events that could take place at the Stadium include professional soccer matches, concerts, motocross events, and trade shows.

The Stadium is estimated to require approximately 2,600 employees during typical major events (i.e. 65,000 spectators), with fewer employees required for smaller events (average attendance 25,000), depending upon the event. During the balance of the year, the number of employees would be a limited staff of approximately 20 maintenance personnel.



**Table VI.B.2-1  
Stadium Event Profile**

<b>Event</b>	<b>Events per Year</b>	<b>Sold Out Events<sup>1</sup></b>	<b>Attendance</b>
NFL Football Regular Season <sup>2</sup>	16 Total (14 Sunday games, 2 Monday/Thursday games)	5	50,000 - 60,000
NFL Football Preseason	4	0	40,000 - 50,000
College Football <sup>3</sup>	6 Saturday games	1	50,000 - 60,000
Major League Soccer (MLS)	14 regular season games. 1 playoff game. Most games on Sundays, some on weekdays	6	18,000 - 25,000
Soccer Exhibitions	9	3	40,000 - 60,000
Other events (motocross, concerts, etc.)	5 events per year (weekday or weekend)	2	25,000
<b>Totals</b>			
Events per Year	55 events		
Total Annual Attendance	2,580,500 spectators		
Average Daily Attendance	46,900 spectators		
Employees	20 permanent maintenance personnel. 2,600 temporary employees for major events includes concessions, parking, crowd control, retail, safety and security. Fewer employees would be required for other events, depending on the characteristics of the event.		
<sup>1</sup> Sold out event assumes 65,000 for NFL games, CFA games, and other events; and 25,000 for MLS games. <sup>2</sup> Interest has been expressed in locating two professional teams at Hollywood Park. Accordingly, this EIR assumes use of the Stadium by two professional teams. Additionally the potential exists for Super Bowls to be played at this stadium. Super Bowls have not been included in the typical attendance calculations as they would be an infrequent, specialized event. <sup>3</sup> Potentially (depending on the teams playing at the proposed Stadium), every other year one of the collegiate games could be a 82,000 spectator event. This potential event has been included in the calculations for annual attendance and average daily attendance in order to provide a maximum number. Source: Hollywood Park Athletic Stadium EIR, 1995.			

### Façade, Lighting, and Site Design

The Stadium would be constructed of reinforced concrete, and steel with a glass and metal finish. The height of the proposed stadium as contemplated in the 1995 EIR was 125 feet above grade. Playing field lighting would consist of 600-700 metal halide fixtures mounted on four lighting racks. These racks would be mounted on the interior edge of the masts of the Stadium. Security lighting would illuminate the façade, parking areas, and any on-site roadways. Parking lot and exterior building lights would be directed downward and toward the interior of the site to reduce the impacts of glare on adjacent uses. A consistent signage style and format would be developed for the Stadium. Visually offensive equipment (HVAC units, dumpsters, etc.) would be screened from view from public streets per the City of Inglewood design controls.

## Aesthetics

### *Views and Urban Design*

Impacts on views and urban design under the Proposed Project would be less than significant after mitigation. Under this Alternative, the Project Site would be redeveloped in the area currently containing the Racetrack. The Racetrack would be demolished and the stadium would be constructed in approximately the same location. The stadium structure would be approximately 125 feet above grade and thus would be visually prominent to the surrounding neighborhood. The stadium structure would however be compatible with the existing environment, as it would be located within proximity to and within sight of the Forum and the Casino, and it would not be a substantial increase in building height as compared to the existing Hollywood Park Racetrack grandstands. Although this Alternative would alter the views of and from the Project Site, the resulting views and urban design would provide several visual improvements. Under this Alternative, the overall visual character of this site would be improved as compared to the property's current condition. Impacts to views and urban design under this Alternative would be less than significant.

### *Light and Glare*

Impacts on light and glare under the Proposed Project would be less than significant after mitigation. This Alternative would generate new sources of light and glare in the form of street lighting, signage illumination and structural light illumination within and on top of the stadium. Stadium lighting would consist of 600-700 metal halide fixtures mounted on four lighting racks. These racks would be mounted on the interior edge of the masts of the Stadium. In comparison to the Proposed Project, which would reduce the extent of evening lighting and illumination from pole mounted lights in the parking areas and event lighting (created by evening events at the racetrack), this Alternative would have increased light and glare impacts during evening stadium events, resulting in a potentially significant and unavoidable impact.

### *Shade and Shadow*

The Proposed Project would result in a less than significant impact with respect to shade/shadow. This Alternative would be developed with a stadium structure at a height of 125 feet above grade. Due to the proposed location of the stadium footprint in central area of the Project Site, the stadium's shadow would potentially impact the areas to the west across Prairie and to the north, on the existing Project Site, and to the east. During the summer solstice, the longest shadows would be cast at a distance of approximately 171 feet between 9:00 a.m. and 5:00 p.m., with the longest shadows occurring during the early morning hours to the west and during the late afternoon to the east. Shadows during midday would be significantly shorter and oriented to the north. During the summer solstice, morning shadows would not be cast upon the residential and commercial properties along the west side of Prairie Avenue, and would not shade these uses for more than 4 consecutive hours during the summer months. During the winter solstice, the maximum shadow length from a 125 foot structure would be approximately 402 feet between

9:00 a.m. and 3:00 p.m., with the longest shadows occurring during the morning hours to the west and during the afternoon hours to the east. Shadows during midday would be significantly shorter and oriented to the north (approximately 196 feet north at 12:00 p.m.). Winter shadows would not impact the residential properties west of the commercial properties along Prairie Avenue for more than 3 consecutive hours. Afternoon shadows would be cast upon the Hollywood Park property and thus would not affect any sensitive receptors. Therefore, like the Proposed Project, this Alternative would result in less than significant shade and shadow impacts.

## **Air Quality**

### *Construction*

The Proposed Project would result in significant and unavoidable construction impacts with respect to air quality. The daily construction intensity (e.g., construction equipment hours) for the Hollywood Park Athletic Stadium Alternative would be similar to the daily construction intensity assumed for the Proposed Project since the racetrack would also be demolished under this Alternative and a new structure built. Accordingly, the Hollywood Park Stadium Alternative daily regional construction emissions of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> would be similar to the emissions presented for the proposed project and would result in a significant and unavoidable air quality impact.

### *Operational*

The Hollywood Park Athletic Stadium Alternative would generate more mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 170 ppd for VOC, 267 ppd for NO<sub>x</sub>, 1,979 ppd for CO, three ppd for SO<sub>x</sub>, 88 ppd for PM<sub>2.5</sub>, and 452 ppd for PM<sub>10</sub>. Weekend emissions would be approximately 206 ppd for VOC, 323 ppd for NO<sub>x</sub>, 2,397 ppd for CO, three ppd for SO<sub>x</sub>, 107 ppd for PM<sub>2.5</sub>, and 548 ppd for PM<sub>10</sub>. Regional operational emissions would exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, the Hollywood Park Athletic Stadium Alternative regional operational emissions would result in a significant and unavoidable impact.

Mobile source emissions associated with the Hollywood Park Athletic Stadium Alternative would potentially increase localized CO emissions. Project-related one- and eight-hour CO concentrations were 3.2 and 2.2 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Increased traffic associated with the Hollywood Park Athletic Stadium Alternative would not substantially change the CO concentrations estimated for the Proposed Project. As such, the Hollywood Park Athletic Stadium Alternative would result in a less than significant localized CO impact.

The Hollywood Park Athletic Stadium Alternative would be consistent with the current General Plan land use designation utilized to calculate the emissions budget in the most recent AQMP. As such, the Hollywood Park Athletic Stadium Alternative would be compatible with the AQMP. The Hollywood Park Athletic Stadium Alternative would generate more GHG emissions than estimated for the Proposed Project

on a daily basis. However, the Hollywood Park Athletic Stadium Alternative would generate less annual GHG emissions than the Proposed Project as the athletic stadium would not be used on a daily basis. Overall, like the Proposed Project, the Hollywood Park Athletic Stadium Alternative would result in a less than significant global warming impact.

Overall, Hollywood Park Athletic Stadium Alternative emissions would be greater than Proposed Project emissions, but would result in similar significant and unavoidable air quality impact conclusions for operations. However, unlike the Proposed Project, the Hollywood Park Athletic Stadium Alternative would be consistent with the SCAQMD AQMP.

### **Geology and Soils**

Impacts on geology and soils under the Proposed Project would be less than significant after mitigation. This Alternative would involve the development of a stadium located in the central area of the Project Site. With regard to geological and associated seismic risks, this Alternative would propose a structure to be located outside of the delineated Restricted Use Zone (RUZ) of the Potrero fault zone. As delineated on the 1984 Alquist Priolo Special Studies Zone Map, there are no active faults beneath the area that would be developed with the stadium. The geotechnical recommendations associated with site preparation, earthwork and foundations that are identified in the 1995 Hollywood Park Stadium EIR and the EIR for the Proposed Project would carry over to this Alternative, with site specific geotechnical engineering considerations for the construction of a stadium structure. Therefore, the geology and soils impacts under this Alternative would be less than significant after mitigation.

### **Hazardous Materials and Risk of Upset**

#### *Construction*

Construction impacts on hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, this Alternative would result in the demolition of existing uses except for the Casino, and would generate potentially significant impacts associated with potential exposure to asbestos containing materials (ACMs) and lead based paint (LBP) during construction. Construction of this Alternative would also involve site clearing and construction activities within the parking lot areas on the Project Site. Therefore, this Alternative would have a less than significant impact with respect to hazardous materials during construction.

#### *Operation*

Operational impacts with respect to hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Under this Alternative, the stadium uses would not require or generate substantial hazardous materials. Operations would involve the use and storage of pesticides, fertilizer, cleaning solvents, and similar potentially hazardous materials used during the maintenance and operation of a stadium facility, but such use would be similar to the existing uses associated with the

racetrack operations. Therefore, this Alternative would have a less than significant impact after with mitigation with respect to hazardous materials during operation.

## **Cultural Resources**

### *Archeological Resources*

A cultural resources records search was conducted for the Hollywood Park Redevelopment Project Property by the South Central Coastal Information Center, California Historical Resources Information System in July 2007. Based on a review of all recorded archaeological sites within a ½-mile radius of the Project Site and cultural resource reports on file, database records for all California Points of Historical Interest, California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places, and the California Historical Resources Inventory listings, no significant cultural resources are known to be located on the Project Site. Therefore, neither the Project nor the Stadium Alternative would result in any impacts to known cultural resources. Nevertheless, mitigation measures are proposed to reduce the impacts to less than significant levels for unknown cultural resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.

### *Historic Resources*

The Proposed Project would not result in any impacts to significant historic resources. Similar to the Proposed Project, this Alternative would involve the demolition of existing structures on the Project Site except for the Casino. Through a comprehensive historic resource analysis which included a field investigation of the Project Site and surrounding area, review of building permit records, maps, books and photographs, it was determined, by an evaluation of criteria used by the California Register of Historical Resources and the National Register of Historic Places, that none of the existing buildings located on the Project Site are considered significant cultural resources pursuant to CEQA. As such, this Alternative would result in a less than significant impact to historic resources.

## **Hydrology/Water Quality**

### *Construction*

Construction-related impacts on water quality under the Proposed Project would be less than significant after mitigation. Under the Stadium Alternative, water quality impacts would be slightly reduced, but similar to the Proposed Project. This Alternative would result in the demolition of existing uses except for the Casino and it would involve the redevelopment of the remainder of the Project Site to accommodate a stadium and parking for the site. Therefore, this Alternative would result in similar amounts of disturbed site area as compared to the Proposed Project. Accordingly, the construction activities would generate a similar potential to impair the surface water flows during storm events as compared to the Proposed Project. However, the implementation of prescribed best management practices and compliance with the RWQCB regulations would reduce potentially significant water quality

impacts to less than significant levels. Therefore, this Alternative would result in less than significant impacts after mitigation.

#### *Operational*

Operational impacts to water quality under the Proposed Project would be less than significant after mitigation. Under the Stadium Alternative, the amount of impervious surface area would be slightly decreased as compared to the existing site conditions, as the area to be developed is entirely paved with a surface parking lot. The existing parking areas would be redeveloped with a stadium and the surrounding areas, which are currently impervious, would be landscaped to improve visual aspects and the site's stormwater flows. Therefore, the Stadium Alternative would result in reduced flows as compared to existing conditions, but operational flows would be roughly the same as compared to the Proposed Project. Similar to the Proposed Project, it is anticipated that development of the site would be designed in a manner that retains and controls storm water flows in a manner that would not significantly impact the existing storm water infrastructure. Accordingly, this Alternative would result less than significant water quality impacts after mitigation.

#### **Noise**

##### *Construction*

Construction activity associated with the Stadium Alternative would result in similar noise levels as discussed for the Proposed Project. Construction-related noise exposure would also be expected to be similar in duration due to a similar amount of required construction activity. Construction noise levels would be generally the same for the residential land uses closest to the stadium site (i.e., the residential uses west of Prairie Avenue, the Renaissance development, Darby Park, and the residential neighborhoods east of the training track). Therefore, even with implementation of comparable mitigation measures prescribed for the Proposed Project, mitigated construction noise levels for this Alternative would also likely exceed the five dBA significance threshold at the sensitive receptors near the Project Site. As such, construction activity would result in a significant and unavoidable short-term construction noise impact. It is anticipated however that construction activity associated with the alternative would comply with the standards established in the Noise Ordinance. Nevertheless, like the Proposed Project, construction noise impacts associated with the Stadium Alternative would be considered significant and unavoidable after mitigation.

##### *Operational*

On event days, the Stadium Alternative would result in more daily vehicle trips than the Proposed Project and, as such, would result in higher mobile noise levels. On non-event days, operational noise impacts would be reduced as compared to the Proposed Project. Mobile noise associated with the Stadium Alternative may result in noise level increases greater than three decibels within the "normally unacceptable" or "clearly unacceptable" category (see Section IV.G. Noise). However, such noise impacts would only occur immediately prior to and after events, which would occur on 55 days per year. Likewise,

stationary noise sources associated with the Stadium Alternative would be louder than the Proposed Project, but would be limited to 55 days per year. Stationary noise under this Alternative would be expected to be substantially similar to the existing noise levels associated with live race events currently existing at Hollywood Park. Overall, noise associated with this Alternative would be similar to noise levels that are currently occurring under the existing operations, but would be increased as compared to the Proposed Project. Because the Stadium Alternative may result in noise level increases greater than three decibels within the “normally unacceptable” or “clearly unacceptable”, impacts would be considered significant and unavoidable, which would result in a significant impact not created by the Proposed Project.

### **Population, Housing, and Employment**

Impacts on population, housing and employment under the Proposed Project would be significant and unavoidable due to a technical inconsistency with regional housing and population growth forecasts.

#### *Construction Impacts*

The Proposed Project would generate approximately 17,105 construction-related jobs over the 10-year buildout and stabilization horizon of the Proposed Project. As this Alternative would require a similar amount of demolition and construction work as the Proposed Project, it is estimated that employment opportunities associated with construction of this Alternative would be similar as compared to the Proposed Project. The number of temporary construction jobs would be considered a beneficial impact under this Alternative, and similar to the Proposed Project, indirect impacts upon regional population, housing and employment conditions would be less than significant under this Alternative.

#### *Operational Impacts of the Alternative*

##### *Employment Displacement Impacts*

Similar to the Proposed Project, this Alternative would eliminate horse racing at the Hollywood Park Racetrack and would generate employment displacement with respect to the horse racing industry. However, as discussed below in more detail, this Alternative would generate new types of job opportunities required to operate an athletic stadium. Therefore, operational employment displacement impacts for this Alternative would be less than significant.

##### *Employment Generation Impacts*

##### Indirect Employment Growth

Employment opportunities typically associated with stadium venues would not likely result in substantial permanent population growth or associated housing demands. Indirect impacts to population and housing demographics generated by this Alternative would be considered less than significant, and would be essentially equivalent to the less than significant impact generated by the Proposed Project.

### Direct Employment Growth

The Stadium Alternative would generate approximately 20 permanent full-time new jobs, 2,600 temporary event related new jobs, and no housing units.<sup>1</sup> This Alternative would result in a decrease of permanent full-time jobs. As compared to the Proposed Project, which would generate approximately 517 net new jobs, the level of full-time employment generated by this Alternative would be significantly reduced. Nevertheless, as this Alternative would still generate substantial temporary and event-related jobs, employment impacts would be considered less than significant.

### *Population/Housing Impacts*

This Alternative would involve the construction of no new dwelling units and, as such, would not generate any population growth. As compared to the Proposed Project, which would create approximately 2,995 new residential dwelling units, resulting in approximately 8,985 new permanent residents, this Alternative would not generate housing and population growth.

Although this Alternative avoids the Proposed Project's significant and unavoidable impact due to a technical inconsistency with regional housing and population growth forecasts, the Alternative is less beneficial with respect to population and housing because it does not further the SCAG's goals outlined in the Compass Growth Vision Strategy to encourage better relationships between housing, transportation and employment. Likewise, this Alternative does not support the SBCCOG's South Bay Strategy of supporting incentives for well-planned mixed-use development and affordable housing, nor does it aid in creating new market rate and affordable dwelling units needed in Inglewood as determined by the RHNA. Since no dwelling units are created under this Alternative, unlike the Proposed Project, it does not help to bring balance to the job-to-housing ratio in the surrounding job-rich South Bay and Westside job markets. Additionally, this Alternative does not support the Housing Element's goal of providing a significant amount of additional home ownership opportunities within the City so as to promote a balanced ratio of renter-occupied versus owner occupied housing opportunities within the City. Since the Stadium Alternative is inconsistent with the SCAG, SBCCOG and City policies, plans and goals of creating housing closer to jobs and providing additional home ownership opportunities within Inglewood, the Alternative's impacts to population and housing would be significant and unavoidable.

### **Land Use and Planning**

A Stadium Alternative would be consistent with the existing Commercial-Recreation designations of the current Zoning district, General Plan designations, and Redevelopment Plan Land Use designations. Unlike the Proposed Project, this Alternative would not require any discretionary requests involving a zone change, a General Plan Amendment and adoption of a Specific Plan. Therefore, impacts from consistency with land use plans would be less than significant. However, constructing a football stadium

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<sup>1</sup> *Hollywood Park Athletic Stadium EIR, SCH#95-051042, City of Inglewood, September 6, 1995.*



on the Project Site would create potential use conflicts with the existing land uses in the surrounding areas. The surrounding area is comprised of a mix of low-to medium-density residential, commercial, motel, and office uses. The placement of a stadium directly adjacent to these land uses could create conflicts caused by the concentration of traffic and noise when events are being hosted at the stadium. This would result in a significant and unavoidable impact.

### Public Utilities

With the exception of operational solid waste, impacts on public utilities under the Proposed Project would be considered less than significant.

#### Water

The Stadium Alternative is estimated to utilize approximately 3,000 gallons per minute (gpm) of water during peak demand, or approximately 469,180 gallons per event. With an estimated 55 events per year, this Alternative would increase water demands by 79 acre feet per year for the stadium. With the continued operation of the casino, it is estimated this Alternative would utilize 661,780 gpd on event days. As shown in Table VI.B.2-2, below, this Alternative would consume 65 AF/yr less than current demands.

**Table VI.B.2-2  
Estimated Water Consumption by the Stadium Alternative**

Land Use	Unit/Quantity	Water Use (gal/day/unit)	Total (gal/day)	Total (AF/year)
<i>Existing</i>				
Existing Uses <sup>a</sup>	--	--	--	360
<i>Stadium Alternative</i>				
Stadium	55 events per year 46,918 persons per event	10 gal/person/event	469,180	79
Casino	321,000 sf	0.6 gal/sf/day <sup>b</sup>	192,600	216
<b>Total Alternative Water Demand</b>			<b>661,780</b>	<b>295</b>
<b>Total Net Water Demand</b>			<b>340,641</b>	<b>(65)</b>
<i>Notes:</i>				
<i>du: Dwelling units</i>				
<i>sf: Square feet</i>				
<i>AFY: Acre feet per year.</i>				
<sup>a</sup> <i>Hall and Foreman, EIR Technical Appendix - Public Utilities Report, May 2008.</i>				
<sup>b</sup> <i>Hollywood Park Project, Utilities and Infrastructure Technical Report, Hall &amp; Foreman, August 29, 2008.</i>				
<i>Source: Hollywood Park Athletic Stadium EIR, SCH#95-051042, City of Inglewood, September 6, 1995; and, Christopher A. Joseph &amp; Associates, July 2008.</i>				

As discussed in Section IV.J.1. Water, the 2005 Urban Water Management Plan accounted for some level of redevelopment on the Hollywood Park project site. Since the Stadium Alternative's water demand is less than existing conditions, all of the water demanded by the Stadium Alternative has already been accounted for in the 2005 UWMP.

Similar to the Proposed Project, Ordinance No. 170,978 would apply to this Alternative, resulting in increased water conservation measures although no mitigation measures are proposed for this Alternative. Impacts under this Alternative associated with water availability would be less than significant.

### Wastewater

Wastewater generation for the stadium under this Alternative is estimated to be 469,180 gallons per event, assuming an average attendance of 46,918 spectators per event and using a rate of 10 gallons per spectator per event. Additionally, the casino would be expected to generate approximately 112,350 gpd of wastewater. As shown in Table VI.B.2-3 below, this Alternative would generate a net increase of approximately 57,530 gpd of wastewater on event days. This Alternative would generate increased wastewater flows on event days, which would be limited to 55 days per year. As compared to the Proposed Project, peak daily flows including event days, and annual flows would be decreased under this Alternative. Similar to the Proposed Project, it is expected that the existing wastewater infrastructure would be sufficient to handle the demands from this Alternative. Therefore, impacts under this Alternative with regard to wastewater would be considered less than significant.

**Table VI.B.2-3  
Estimated Wastewater Generation by the Stadium Alternative**

Land Use	Unit/Quantity	Generation Rate (gpd/unit)	Total (gallons/day)
<b>Existing</b>			
Existing Uses <sup>a</sup>	--	--	524,000
<b>Subtotal Existing:</b>			
<b>Stadium Alternative</b>			
Stadium	55 events per year 46,918 persons per event	10 gal/person/event <sup>b</sup>	469,180
Casino	321,000 sf	0.35 gal/sf/day <sup>c</sup>	112,350
<b>Total Alternative Wastewater Generation</b>			<b>581,530</b>
<b>Total Net Wastewater Generation</b>			<b>57,530</b>
<i>Notes:</i>			
<sup>a</sup> Hollywood Park Project, Utilities and Infrastructure Technical Report, Hall & Foreman, August 29, 2008.			
<sup>b</sup> Hollywood Park Athletic Stadium EIR, SCH#95-051042, City of Inglewood, September 6, 1995.			
<sup>c</sup> Based on County Sanitation Districts of Los Angeles County wastewater generation rates.			
Source: Christopher A. Joseph & Associates, July 2008.			

### Energy

#### Electricity

As shown in Table VI.B.2-4, below, this Alternative would generate a peak demand for approximately 10,000 kilowatts per hour per event during periods of the most intense use of the stadium, and this Alternative would require 8,763,300 KW-hr for the operation of the casino. The additional electrical demand posed by the Stadium Alternative would require the existing distribution system at Hollywood

Park to be reconfigured and expanded. New electrical facilities required to serve the stadium consist of two elements: a new customer substation and a 66 Kilovolt transmission line tap to serve the new substation. In 1995 Southern California Edison determined that electrical loads resulting from the proposed stadium project were within the parameters of the overall projected load growth that Edison had planned for in the Inglewood area. That determination, however, would need to be confirmed by Edison for this Alternative in consideration of current conditions. This Alternative would result in an electricity demand of approximately 9,313,300 KW-Hr of electricity per year, which when compared to the existing conditions, this Alternative would result in a decrease in demand electricity by approximately 16,696,704 KW/hr/year. As compared to the Proposed Project, this Alternative would require less electricity by approximately 23,533,548 KW/hr/year. With further evaluation from Edison and the completion of the required infrastructure upgrades, it is expected that electrical facilities would be sufficient to handle the peak loads for the stadium under this Alternative. Therefore, this Alternative would result in less than significant electricity impacts after mitigation.

**Table VI.B.2-4  
Estimated Electricity Demands – Stadium Alternative**

Land Use	Size (SF)	Demand (Kilowatt hours/unit/year)	Total (kilowatt hours/year)
Existing Uses <sup>a</sup>	--		26,010,004
<i>Subtotal Existing</i>	-	-	
<b>Stadium Alternative</b>			
Stadium	55 events per year 46,918 persons per event	10,000 KW-Hr/event <sup>b</sup>	550,000
Casino	321,000 sf	27.3 KW-Hr/sf/yr <sup>c</sup>	8,763,300
<b>Total Alternative Electricity Demand</b>			<b>9,313,300</b>
<b>Total Net Electricity Demand</b>			<b>-16,696,704</b>
<p><i>Notes:</i>  <i>du: dwelling unit</i>  <i>sf: square feet</i>  <sup>a</sup> Hollywood Park Land Company, June 8, 2007.  <sup>b</sup> Generation Rates based on the Hollywood Park Athletic Stadium EIR, SCH#95-051042, City of Inglewood, September 6, 1995.  <sup>c</sup> The electricity generation rate was based on existing electricity demands for the casino as provided by the Hollywood Park Land Company.            Source: Christopher A. Joseph &amp; Associates, July 2008.</p>			

### Natural Gas

Under this Alternative, the development of a new stadium would require a maximum of 50,000 cubic feet of natural gas per event for operations, or approximately 2,750,000 cubic feet per year for the stadium.<sup>2</sup>

<sup>2</sup> *Ibid.*

Additionally, this Alternative would require approximately 1,557,960 cubic feet of natural gas per month for the continued operation of the casino. As shown in Table VI.B.2-5, below, this Alternative would generate a net decrease in demand of approximately 2,107,773 cubic feet of natural gas per month as compared to the existing conditions. In comparison to the Proposed Project, which would generate a net total demand for 19,909,975 cf of natural gas per month, demands for natural gas under this Alternative would be reduced by approximately 22,017,748 cf of natural gas per month. Similar to the Proposed Project, it is expected that existing natural gas infrastructure would be sufficient to serve the needs of this Alternative. Therefore, impacts with regard to natural gas demand would be considered less than significant for this Alternative.

**Table VI.B.2-5  
Estimated Natural Gas Consumption – Stadium Alternative**

Land Use	Unit/Quantity	Demand Rate	Total (cf/month)
Existing Uses <sup>a</sup>	--	--	3,894,900
<b>Stadium Alternative</b>			
Stadium	50,000 cf/event	2,750,000 cf/year <sup>b</sup>	229,167
Casino	321,000 sf	-- <sup>c</sup>	1,557,960
<b>Total Alternative Natural Gas Demand</b>			<b>1,787,127</b>
<b>Total Net Natural Gas Demand</b>			<b>-2,107,773</b>
<i>Notes:</i>			
<sup>a</sup> Hollywood Park Land Company, June 8, 2007.			
<sup>b</sup> Hollywood Park Athletic Stadium EIR, SCH#95-051042, City of Inglewood, September 6, 1995.			
<sup>c</sup> Per Hollywood Park Land Company usage totals, the casino represents approximately 40% of the existing natural gas demand.			
Source: Christopher A. Joseph & Associates, July 2008.			

### *Solid Waste*

Demolition activities under this Alternative would generate demolition debris associated with the removal of the racetrack, grandstand and asphalt. The amount of construction waste generated under this Alternative would be substantially similar to the construction waste required for the demolition and building generated under the Proposed Project and it is anticipated that existing landfills would have adequate capacity for the debris during the timeline of the Alternative's construction process. Therefore, construction-related solid waste impacts would be less than significant under this Alternative.

As shown in Table VI.B.2-7, below, net operational solid waste generation for this Alternative would be approximately 2,463 pounds of solid waste per day (annualized over the year). This Alternative would result in an increased generation of solid waste on event days by approximately 40,000 pounds per day. On an annual basis however, solid waste disposal needs under this Alternative would be reduced by approximately 9,793 lbs/day. However, operational-related solid waste impacts would be significant and unavoidable as regional landfill capacity for the life of the Alternative beyond 2015 has not been

accommodated. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) operational solid waste impacts would be significant and unavoidable on a project-specific and cumulative level. Therefore, impacts with regard to operational solid waste would be considered significant and unavoidable for the Stadium Alternative.

**Table VI.B.2-6  
Estimated Construction and Demolition Debris – Stadium Alternative**

Construction Activity	Size (sf)	Rate (lbs./sf) <sup>a</sup>	Generated Waste (tons)
<b>Demolition-Existing Uses</b>			
Main Building/Grandstand	594,000	155	46,035
		<i>Subtotal</i>	<b>46,035</b>
<b>Construction-Alternative</b>			
Stadium	400,000 sf	3.89	778
		<i>Subtotal</i>	<b>1,663</b>
		<b>Total</b>	<b>47,698</b>

<sup>a</sup> Generation rates for demolition, construction and renovation are derived from the *Characterization of Building-Related Construction and Demolition Debris in the United States*, U.S.E.P.A., Report No. EPA530-R-98-101, June 1998. Source: Christopher A. Joseph & Associates, July 2008.

**Table VI.B.2-7  
Estimated Operational Solid Waste Generation – Stadium Alternative**

Land Use	Unit/Quantity	Generation Rate <sup>a</sup> (lbs/unit/day)	Total (Pounds/Day)
<b>Existing Uses</b>			
Main Building/Grandstand	594,000 sf	.006	3,564
Casino <sup>b</sup>	321,000 sf	.005	1,605
		<i>Subtotal</i>	<b>5,169</b>
<b>Stadium Alternative</b>			
Stadium	55	40,000/event <sup>c</sup>	6,027
Casino	321,000 sf	.005	1,605
<b>Total Alternative Solid Waste Generation</b>			<b>7,632</b>
<b>Total Net Solid Waste Generation</b>			<b>2,463</b>

<sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table.  
<sup>b</sup> Does not include the Pavilion area which has been abandoned and is not in use.  
<sup>c</sup> Hollywood Park Athletic Stadium EIR, SCH#95-051042, City of Inglewood, September 6, 1995.  
 Source: Christopher A. Joseph & Associates, July 2008.

## **Public Services**

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

### *Police Protection*

The development of a Stadium Alternative would place an increased demand on the IPD for police protection services. Similar to the Proposed Project, this Alternative would generate tax revenue that the City could use to hire new officers that would help off-set the increased police services demanded on event days. This Alternative would also incorporate mitigation measures to reduce the potential for increasing demands upon police services in the area, such as strategically positioned lighting, building security systems, and implementation of an on-site security plan. This Alternative would not include a police substation on the Project Site, however, it is anticipated with the mitigation measures presented above, impacts on police protection services under this Alternative would be less than significant.

### *Fire Protection*

The projected demand for fire protection services is typically based on the amount and size of new structures on a site. The Stadium Alternative would result in the development of a 65,000 seat stadium that would hold approximately 55 events per day, and the continued operation of the existing casino. As such, this Alternative would place an increased demand on the LACoFD for fire protection services on event days held at the stadium, although fire protection and emergency services needs would likely be decreased as compared to the Proposed Project on non-event days. As discussed in Section IV.K.2, Fire Protection, fire flow requirements would be determined by the LACoFD for the stadium. It is anticipated that the required fire flow would be accommodated for this development as such flows are already able to serve the emergency needs of the existing racetrack facility. Overall, the impact on fire protection services under this Alternative would be less than significant.

### *Schools*

This Alternative would result in the development of a 65,000 seat athletic stadium and the continued operation of the existing casino and would not include the development of any housing units. Therefore, this Alternative would not generate any new students to the area. The Proposed Project would result in the generation of 575 students including 279 elementary students, 137 middle school students, and 159 high school students. To mitigate the impact on schools the Proposed Project is responsible for mandatory payment of school fees in conformance with SB 50, or in the alternative, the Project Applicant may enter into a school finance agreement with respect to a joint use of the 4-acre civic site with the appropriate school district to address mitigation to school impacts in lieu of payment of developer fees. Therefore, the Proposed Project may be an improvement over the Stadium Alternative in that the Proposed Project makes available a 4-acre site that could be a joint use school for students in the City and a library. Nevertheless, impacts to schools under the Proposed Project and the Stadium Alternative would be less than significant.

### *Recreation and Parks*

This Alternative would include the development of a stadium and would not generate any new housing within the City. As such, this Alternative would increase recreational services, but would not generate any additional demands for recreation facilities. The Proposed Project would result in approximately 25 acres for parks and recreation and open space, which would be an over supply as compared to the demand generated by the project characteristics. Impacts to recreation and parks would be considered less than significant for the Stadium Alternative; however, the Proposed Project could be considered more beneficial since it would provide a substantial public benefit by increasing the amount of common open space that is available within the City.

### *Libraries*

This Alternative would not generate any new impacts to the Inglewood Library system because no new residents are generated. The Proposed Project would introduce approximately 8,985 new residents to the Project Site and require additional library services, specifically increasing demand for public-use computers. However, through the potential allocation of the four-acre civic site to a joint use school, including a library, and contribution to the City's tax revenue, these demands would be met. Therefore, the Proposed Project may be an improvement over the Stadium Alternative in that the Proposed Project makes available a 4-acre site that could be a joint use school for students in the City and a library. Accordingly, impacts with regard to library services would be considered less than significant for this Alternative.

### **Traffic and Transportation**

Under the Hollywood Park Athletic Stadium Alternative, the existing Hollywood Park Racetrack would be removed, but the existing Casino would continue to operate. A 65,000 seat athletic stadium to accommodate professional and collegiate football, professional soccer, and/or other special events would be developed. It is anticipated that the athletic stadium would be in use for events approximately 55 days per year. During weekdays, events at the athletic stadium would ordinarily begin at 6:00 p.m., with peak traffic generation coinciding with the weekday p.m. peak hour conditions. During weekends, events at the athletic stadium would ordinarily begin at 1:00 p.m., with peak traffic generation coinciding with the weekend mid-day peak hour conditions.

### ***Hollywood Park Athletic Stadium Weekday Trip Generation Summary***

The weekday trip generation forecast for the Hollywood Park Athletic Stadium Alternative is summarized in Table VI.B.2-8. As presented in Table VI.B.2-8, the Athletic Stadium Alternative is expected to generate 74 fewer vehicle trips (60 fewer inbound trips and 14 fewer outbound trips) during the weekday AM peak hour as the athletic stadium is not anticipated to be utilized during this time period. During the weekday PM peak hour, the Athletic Stadium Alternative is expected to generate an additional 9,769 vehicle trips (12,450 more inbound trips and 2,681 fewer outbound trips). Over a 24-hour period, the

Athletic Stadium Alternative project is forecast to generate an additional 29,170 daily trip ends during a typical weekday (14,585 inbound trips and 14,585 outbound trips).

**Table VI.B.2-8  
Athletic Stadium Alternative Weekday Project Trip Generation**

Patron Mode	Size	Daily Trip Ends Volumes	AM Peak Hour Volumes			PM Peak Hour Volumes		
			In	Out	Total	In	Out	Total
Passenger Vehicles	19,260 vehicles	38,250	Nom.	Nom.	Nom.	12,519	Nom.	12,519
Charter Buses	200 Buses	400	Nom.	Nom.	Nom.	200	Nom.	200
Event Personnel/Others	2,500 vehicles	5,000	Nom.	Nom.	Nom.	Nom.	Nom.	Nom.
<i>Existing Racetrack To Be Removed</i>	<i>(10,000) Attend.</i>	<i>(14,750)</i>	<i>(60)</i>	<i>(14)</i>	<i>(74)</i>	<i>(269)</i>	<i>(2,681)</i>	<i>(2,950)</i>
<b>Alternative Net Total</b>		<b>29,170</b>	<b>(60)</b>	<b>(14)</b>	<b>(74)</b>	<b>12,450</b>	<b>(2,681)</b>	<b>9,769</b>
<i>Note: Assumptions regarding patron mode and trip characteristics are available in Appendix G-1 to this Draft EIR which contains the Revised Traffic Impact Study.</i>								

### ***Hollywood Park Athletic Stadium Weekend Trip Generation Summary***

The weekend trip generation forecast for the Hollywood Park Athletic Stadium Alternative is summarized in Table VI.B.2-9. As presented in Table VI.B.2-9, the Athletic Stadium Alternative is expected to generate an additional 11,003 vehicle trips (11,190 more inbound trips and 187 fewer outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, the Athletic Stadium Alternative project is forecast to generate an additional 35,340 daily trip ends during a typical weekend day (17,670 inbound trips and 17,670 outbound trips).

### ***Traffic Impact Comparison***

#### ***Weekday Conditions***

A qualitative review was conducted to determine if the Athletic Stadium Alternative project would likely result in an increase in project impacts when compared to the Proposed Project. During the weekday conditions, the Athletic Stadium Alternative project is expected to generate 1,678 fewer vehicle trips than the Proposed Project during the AM peak hour. During the PM peak hour, the Athletic Stadium Alternative project is expected to generate 9,808 more vehicle trips than the Proposed Project. Over a 24-hour period, the Athletic Stadium Alternative project is forecast to generate an additional 11,948 daily trip ends during a typical weekday. Based on this comparison, it is determined that the Athletic Stadium Alternative project would likely result in no project impacts when compared to the Proposed Project during the weekday AM peak hour (as the athletic stadium is not anticipated to be utilized during the AM



peak hour time period). However, during the weekday PM peak hour, the Athletic Stadium Alternative project would likely result in an overall increase in traffic impacts when compared to the Proposed Project.

**Table VI.B.2-9  
Athletic Stadium Alternative Weekend Project Trip Generation**

Patron Mode	Size	Daily Trip Ends Volumes	Mid Day Peak Hour Volumes		
			In	Out	Total
Passenger Vehicles	19,260 vehicles	38,250	12,519	Nom.	12,519
Charter Buses	200 Buses	400	200	Nom.	200
Event Personnel/Others	2,500 vehicles	5,000	Nom.	Nom.	Nom.
<i>Existing Racetrack To Be Removed</i>	<i>(15,000) Attend.</i>	<i>(8,580)</i>	<i>(1,529)</i>	<i>(187)</i>	<i>(1,716)</i>
<b>Alternative Net Total</b>		<b>35,340</b>	<b>11,190</b>	<b>(187)</b>	<b>11,003</b>
<i>Note: Assumptions regarding patron mode and trip characteristics are available in Appendix G-1 to this Draft EIR which contains the Revised Traffic Impact Study.</i>					

### *Weekend Conditions*

A qualitative review was conducted to determine if the Athletic Stadium Alternative project would likely result in an increase in project impacts when compared to the Proposed Project. During the weekend conditions, the Athletic Stadium Alternative project is expected to generate 9,629 more vehicle trips than the Proposed Project during the mid-day peak hour and 9,832 more trips over a 24-hour typical weekend period. Based on this comparison, it is determined that the Athletic Stadium Alternative project would likely result in an overall increase in traffic impacts when compared to the Proposed Project during the weekend mid-day peak hour.

### **Parking**

As shown in Table VI.B.2-10, below, the Stadium Alternative would be required by the City of Inglewood Municipal Code to provide 17,280 parking spaces. Under this Alternative, it is assumed the applicant would provide the code-required parking associated with the stadium and casino use. Therefore, impacts with respect to parking under this Alternative would be less than significant.

**Table VI.B.2-10  
City of Inglewood Commercial Parking Requirements – Stadium Alternative**

Land Use	Size (sq. ft./units)	Parking Requirements	Minimum Requirement
Stadium	65,000 seats	1/5 seats	13,000
Casino	321,000 sf	1/75 SF GFA	4,280
<b>Total Parking Required</b>			<b>17,280</b>
<i>Source: City of Inglewood Municipal Code, WMS, 2007, Walker Parking, 2007; and, Hollywood Park Athletic Stadium EIR, SCH#95-051042, City of Inglewood, September 6, 1995.</i>			

**Conclusion**

The Athletic Stadium Alternative would not reduce the following significant and unavoidable impacts associated with the Proposed Project: construction and operational air quality, construction-related noise, population and housing, and operational solid waste. In addition, the Stadium Alternative creates additional significant and unavoidable impacts that are not created by the Proposed Project with respect to: Land Use (Compatibility with existing area) and Noise (Operation).

As described in Table VI.B.2-11, below, the Stadium Alternative would not achieve many of the Project Objectives as it represents a scenario in which the project does not go forward and no residential units are constructed. It should also be noted that although this Alternative is considered a reasonably foreseeable alternative because it is permitted under existing zoning, there is no indication that a stadium would be feasible. Moreover, this alternative is a sub-set of the “No Project” alternative and is not an alternative chosen as being capable of reducing project impacts.

**Table VI.B.2-11  
Assessment of Stadium Alternative to Meet the Project Objectives**

Project Objectives	Assessment of the Alternative to Meet Objectives
1. To contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space;	The Stadium Alternative would not satisfy this objective.
2. To provide an economically viable project that promotes the City’s economic well-being by significantly increasing property and sales tax revenues and providing high-quality retail uses and the opportunity for transient occupancy tax;	The Stadium Alternative would not satisfy this project objective because the economic viability of a stadium is unlikely.
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.	The Stadium Alternative would be consistent with this project objective, as the Casino and Gambling facility would continue to operate.
4. To provide land for a civic/public use.	The Stadium Alternative would satisfy this objective.

Project Objectives	Assessment of the Alternative to Meet Objectives
5. To create exciting community park and open space areas, that exceed the City's existing General Plan goals of one acre per 1,000 residents, in a manner that meets the needs of the proposed development and is beneficial to the overall community;	The Stadium Alternative would not satisfy this objective.
6. To add a variety of ownership-housing opportunities, of different product types and prices, in an area of the greater Los Angeles region that is job-rich, thus creating a better balance of housing and employment opportunities;	The Stadium Alternative would not satisfy this objective.
7. To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;	The Stadium Alternative would not satisfy this objective.
8. To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and public open space within portions of the Merged Redevelopment Project Area;	The Stadium Alternative would assist in eliminating and preventing the spread of blight through the development of a new stadium, but would do so in a different manner as the Proposed Project since no new housing opportunities would be created.
9. To create safe, secure and defensible spaces through project design, while also allowing public spaces, such as parks and retail, to be open to the public;	The Stadium Alternative would satisfy this objective, but to a different degree than the Proposed Project.
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project;	The Stadium Alternative would incorporate sustainability features to the maximum extent feasible for such a use and would satisfy this objective, but to a different degree than the Proposed Project.
11. To promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways in a mixed-use project which integrates housing with employment opportunities;	The Stadium Alternative would not satisfy this objective because the stadium would not create a new walkable neighborhood.
12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities; and	The Stadium Alternative not would satisfy this objective.
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.	The Stadium Alternative would satisfy this objective.

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**VI. ALTERNATIVES TO THE PROPOSED PROJECT**  
**B.3 NO PROJECT ALTERNATIVE - REASONABLY FORESEEABLE**  
**FUTURE DEVELOPMENT (CONVENTION CENTER/HOTEL/CASINO)**  
**ALTERNATIVE**

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In the event the Proposed Project does not go forward, a potential reasonably foreseeable Alternative to the Proposed Project would be the development of a convention center, under a theoretical scenario in which the Proposed Project does not go forward, but an alternative project consistent with the underlying zoning regulations is developed.

The Convention Center Alternative would result in the development of a publicly owned state-of-the-art facility containing 300,000 sf of exhibition space, 50,000 sf of meeting space, 50,000 sf of ballroom, and a 650-room hotel. As compared to the existing conditions, this Alternative would result in the continued operation of the existing casino and would result in the removal and discontinuation of the existing racetrack component. The Project Applicant would continue the operation of the Casino, and the remainder of the Project Site would be purchased by the City and redeveloped to contain a convention center, a supporting hotel use, and associated parking uses. The convention center structure would be situated on the center Project Site, near the current location of the main racetrack and grandstand. The hotel use would be situated along the street frontages of Century Boulevard and Prairie Avenue on the southwest corner of the Project Site. Both the convention center and hotel uses would reach a maximum height of approximately 100 feet. Additionally, the convention center would be constructed in a manner that would allow for the use of the facility to operate as a sports/entertainment arena with approximately 13,500 seats for basketball games and other special events.

**Aesthetics**

*Views and Urban Design*

Impacts on views and urban design under the Proposed Project would be less than significant after mitigation. Under this Alternative, the existing casino would continue to be operational and the convention center and hotel structures would be designed to be compatible with the other uses in the existing environment. The design and use of the structures under this Alternative would be representative of the goals identified in the Merged Redevelopment Plan by redeveloping the Project Site with a high quality and modern development. Views of and from the Project Site would be altered under this Alternative as compared to the Proposed Project as this Alternative would not result in building heights above 100 feet, but the total developed area of higher height limits would be greater. Nevertheless, impacts under this Alternative would be less than significant. As the development for the Project Site under this Alternative would be consistent with the Merged Redevelopment Plan and would provide several visual improvements to the Project Site, the urban design of this site would be improved as compared to the existing conditions. Therefore, impacts to views and urban design under this Alternative would be less than significant.

### *Light and Glare*

Impacts on light and glare under the Proposed Project would be less than significant after mitigation. This Alternative would generate sources of light and glare in the form of parking lot lighting, vehicle headlights, informational signage illumination and structural light illumination from within the convention center, hotel uses, and casino. In comparison to the Proposed Project, which would reduce the extent of evening lighting and illumination from pole mounted lights in the parking areas and event lighting, this Alternative would result increased lighting sources for parking at the convention center and hotel use during nighttime. However, with proper implementation of directional lighting techniques, this impact would be expected to be less than significant. With respect to glare, the convention center and hotel structures would be designed with building materials that would not cause excessive glare that is visually inconsistent with surrounding land uses, or result in a substantial increase in glare that would affect nearby sensitive uses, and these impacts would be considered less than significant.

### *Shade and Shadow*

The Proposed Project would result in a less than significant impact with respect to shade/shadow for structures with a maximum height of 150 feet. Under this Alternative, the existing casino would continue to be operational and the convention center and hotel structures would be designed for a maximum height of 100 feet. Accordingly, it is reasonable to assume that based on a decrease in building height as compared the Proposed Project, this Alternative would result in decreased building shadow lengths and would also result in a less than significant impact with respect to shade and shadow.

## **Air Quality**

### *Construction*

The Proposed Project would result in significant and unavoidable construction impacts to air quality. The Convention Center Alternative would require less construction activity than the Proposed Project due to a smaller overall development size and the retention of the casino. As such, pollutant emissions over the length of the construction phase for the Convention Center Alternative would be reduced. However, the daily construction intensity (e.g., construction equipment hours) during peak construction days for the Convention Center Alternative would be similar to the daily construction intensity assumed for the Proposed Project. And, assuming that the Convention Center Alternative would require more than 13 acres to be graded per day, construction emissions would exceed the SCAQMD regional and localized significance thresholds for NO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, the Convention Center Alternative, like the Proposed Project, daily construction emissions would result in a significant and unavoidable air quality impact.

### *Operational*

The Convention Center Alternative would result in fewer regional operational emissions than the Proposed Project due to the decrease in overall development. Weekday emissions would be approximately 13 ppd for VOC, 18 ppd for NO<sub>x</sub>, 131 ppd for CO, less than one ppd for SO<sub>x</sub>, six ppd for PM<sub>2.5</sub>, and 30 ppd for PM<sub>10</sub>.

Weekend emissions would be approximately 48 ppd for VOC, 73 ppd for NO<sub>x</sub>, 544 ppd for CO, less than one ppd for SO<sub>x</sub>, 24 ppd for PM<sub>2.5</sub>, and 124 ppd for PM<sub>10</sub>. The reduction in development would eliminate the VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub> regional operational impact associated with the Proposed Project. As such, the Convention Center Alternative daily operational emissions would result in a less than significant regional operational air quality impact.

The Convention Center Alternative would result in fewer daily vehicle trips than the Proposed Project and, as such, would result in less localized CO concentrations. Therefore, the Convention Center Alternative would result in a less than significant localized CO impact.

The Convention Center Alternative would be consistent with the current General Plan land use designation utilized to calculate the emissions budget in the recent AQMP. As such, unlike the Proposed Project, the Convention Center Alternative would be compatible with the AQMP.

### **Geology and Soils**

Impacts on geology and soils under the Proposed Project would be less than significant after mitigation. This Alternative would involve the new development of a convention center located in the center of the Project Site, a hotel use located on the southwest corner of the Project Site, and the continued operation of the casino. With regard to geological and associated seismic risks, this Alternative would propose structures to be located outside of the delineated Restricted Use Zone (RUZ) of the Potrero fault zone. As delineated on the 1984 Alquist Priolo Special Studies Zone Map, there are no active faults beneath the area that would be developed with the convention center or hotel. The geotechnical recommendations associated with site preparation, earthwork and foundations that are identified in the EIR for the Proposed Project would carry over to this Alternative, with site specific geotechnical engineering considerations for the construction of a convention center and hotel to be provided to the extent this Alternative goes forward. Therefore, the geology and soils impacts under this Alternative would be less than significant.

### **Hazardous Materials and Risk of Upset**

#### *Construction*

Construction impacts on hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Similar the Proposed Project, this Alternative would result in a significant amount of demolition as the only structure to be retained under this Alternative is the casino. Therefore, this Alternative would be required to follow the same remediation and disposal requirements as the Proposed Project for the demolition of existing uses, and this would not generate potentially significant impacts associated with potential exposure to asbestos containing materials (ACMs), lead based paint (LBP), or other hazardous materials during construction. Therefore, this Alternative would have a less than significant impact after mitigation with respect to hazardous materials during construction.

### *Operation*

Operational impacts with respect to hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Under this Alternative, the convention center, hotel, and continued operation of the casino would not require the use of or generate substantial hazardous materials. Operations would involve the use and storage of pesticides, fertilizer, cleaning solvents, and similar potentially hazardous materials used during the maintenance and operation of the facilities, and such use would be similar to the existing uses associated with the racetrack operations. Therefore, this Alternative would have a less than significant impact after mitigation with respect to hazardous materials during operation.

## **Cultural Resources**

### *Archaeological Resources*

A cultural resources records search was conducted for the Hollywood Park Redevelopment Project Property by the South Central Coastal Information Center, California Historical Resources Information System in July 2007. Based on a review of all recorded archaeological sites within a ½-mile radius of the Project Site and cultural resource reports on file, database records for all California Points of Historical Interest, California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places, and the California Historical Resources Inventory listings, no significant cultural resources are known to be located on the Project Site. Therefore, neither the Project nor the Convention Center Alternative would result in any impacts to known cultural resources. Nevertheless, mitigation measures are proposed to reduce the impacts to less than significant levels for unknown cultural resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.

### *Historic Resources*

The Proposed Project would not result in any impacts to significant historic resources. Through a comprehensive historic resource analysis which included a field investigation of the Project Site and surrounding area, review of building permit records, maps, books and photographs, it was determined, by an evaluation of criteria used by the California Register of Historical Resources and the National Register of Historic Places, that none of the existing buildings located on the Project Site are considered significant cultural resources pursuant to CEQA. As such, like the Proposed Project, impacts to historic resources would be less than significant.

## **Hydrology/Water Quality**

### *Construction*

Construction-related impacts on water quality under the Proposed Project would be less than significant after mitigation. Under the Convention Center Alternative, water quality impacts would be substantially

similar to the Proposed Project. The construction activities would generate approximately the same potential to impair the surface water flows during storm events. However, implementation of prescribed best management practices and compliance with the RWQCB regulations would reduce potentially significant water quality impacts to less than significant levels. Accordingly, water quality impacts under this Alternative would be less than significant after mitigation.

#### *Operational*

Operational impacts to water quality under the Proposed Project would be less than significant after mitigation. Under the Convention Center Alternative, the amount of pervious surface area would be decreased as compared to the Proposed Project. This Alternative would not include residential areas with landscaping or the 25 acres of open space as compared to the Proposed Project. The operational conditions of the Project Site under this Alternative would include more impervious surfaces such as pavement for parking for the convention center and the hotel use. Accordingly, the Convention Center Alternative would result in increased flows as compared to the Proposed Project. Similar to the Proposed Project, however, it is anticipated that development of the site under this Alternative would be designed in a manner that retains and controls storm water flows to avoid significant impacts on the existing storm water infrastructure. As such, operational water quality impacts under this Alternative, like the Proposed Project, would be less than significant after mitigation.

#### **Noise**

##### *Construction*

Construction activity associated with the Convention Center Alternative would result in similar noise levels as discussed for the Proposed Project. However, because this Alternative would involve a smaller overall amount of development, noise impacts would affect neighboring land uses for a shorter overall duration. Construction noise levels would be generally the same for the residential land uses closest to the central and northern portion of the Project Site (i.e., the residential homes north of W. 90<sup>th</sup> Street), but would be slightly reduced for the areas to the east (i.e., the Renaissance development, Darby Park, and the residential neighborhoods east of the training track). Therefore, it is anticipated that even with the implementation of comparable mitigation measures prescribed for the Proposed Project, mitigated construction noise levels for this Alternative would also likely exceed the five dBA significance threshold at the sensitive receptors near the Project Site. As such, construction activity would result in a significant and unavoidable short-term construction noise impact. It is anticipated however that construction activity associated with the alternative would comply with the standards established in the Noise Ordinance. Nevertheless, construction noise impacts associated with the Convention Center Alternative would be considered significant and unavoidable after mitigation.



### *Operational*

On weekend event days, the Convention Center Alternative would result in more daily vehicle trips than the Proposed Project and, as such, would result in higher mobile noise levels. On weekday event days and non-event days, operational noise impacts would be reduced. Noise level increases typically associated with activity immediately prior to and after events would be similar to race days currently on the Project Site, and these activities would not be expected to increase noise levels by more than three dBA CNEL and, as such, would result in a less than significant impact on the ambient noise environment. And, as the special events would take place inside the convention center, stationary noise under this Alternative would be expected to be substantially reduced as compared to the existing noise levels associated with live race events at Hollywood Park. Therefore, like the Proposed Project, the Convention Center Alternative would result in less than significant operational noise impacts.

### **Population, Housing, and Employment**

Impacts on population, housing and employment under the Proposed Project would be significant and unavoidable due to a technical inconsistency with regional housing and population growth forecasts.

### *Construction Impacts*

The Proposed Project would generate approximately 17,105 construction-related jobs over the 10-year buildout and stabilization horizon period. As this Alternative would require less construction work than the Proposed Project, it is estimated that employment opportunities associated with construction of this Alternative would be reduced as compared to the Proposed Project. The number of temporary construction jobs would be considered a beneficial impact under this Alternative, and similar to the Proposed Project, indirect impacts upon regional population, housing and employment conditions would be less than significant under this Alternative.

### *Operation Impacts*

#### *Employment Displacement Impacts*

Similar to the Proposed Project, this Alternative would not retain horse racing at the Hollywood Park Racetrack and would generate employment displacement with respect to the horse racing industry. However, as discussed in more detail below, this Alternative would generate new types of job opportunities required to operate a convention center and hotel. Operational employment displacement impacts for this Alternative would be less than significant.

### *Employment Generation Impacts*

#### Indirect Employment Growth

Employment opportunities typically associated with convention centers and hotels would not likely result in substantial permanent population growth or associated housing demands because it is not likely that the jobs created would cause a substantial amount of relocation to the City. Indirect impacts to population and housing demographics generated by this Alternative would be considered less than significant.

#### Direct Employment Growth

The Convention Center Alternative would generate approximately 1,404 permanent jobs for the convention center component (assuming 3.51 employees per 1,000 sf), and 514 permanent jobs for the hotel component (assuming 1.13 employees per 1,000 sf and each hotel room is approximately 700 sf), totaling 1,918 new permanent full-time jobs. This Alternative would also include the continued operation of the casino, which currently requires 1,017 jobs. In summary, the combination of the new 1,918 jobs and the 1,017 jobs required to operate the existing casino, would result in approximately 2,935 jobs. As compared to the existing 2,618 jobs that are currently generated by the Project Site, this Alternative would result in a net increase of 317 jobs. As compared to the Proposed Project, which would generate approximately 517 net new jobs, this Alternative would result in an increase of 317 jobs. Therefore, as this Alternative would generate a net increase in jobs, employment impacts would be considered less than significant. As compared to the Proposed Project, this Alternative would be less beneficial as it would result in fewer new jobs.

### *Population/Housing Impacts*

This Alternative would involve the construction of no new dwelling units and, as such, would not generate any population or housing growth. As compared to the Proposed Project, which would create approximately 2,995 new residential dwelling units, resulting in approximately 8,985 new permanent residents, this Alternative would not generate housing and population growth. Although this Alternative avoids the Proposed Project's significant and unavoidable impact due to a technical inconsistency with regional housing and population growth forecasts, the Alternative is not consistent with the local and regional housing policies, plans and goals. The Convention Center Alternative does not further the SCAG's goals outlined in the Compass Growth Vision Strategy to encourage better relationships between housing, transportation and employment. Likewise, this Alternative does not support the SBCCOG's South Bay Strategy of supporting incentives for well-planned mixed-use development and affordable housing, nor does it aid in creating new market rate and affordable dwelling units needed in Inglewood as determined by the RHNA. Since no dwelling units are created under this Alternative, unlike the Proposed Project, it does not help to bring balance to the job-to-housing ratio in the surrounding job-rich South Bay and Westside job markets. Additionally, this Alternative does not support the Housing Element's goal of providing a significant amount of additional home ownership opportunities within the City so as to

promote a balanced ratio of renter-occupied versus owner occupied housing opportunities within the City. As a result, impacts to population and housing would be significant and unavoidable.

### **Land Use and Planning**

A Convention Center Alternative would be consistent with the existing Commercial-Recreation designations of the current Zoning district, General Plan designations, and Redevelopment Plan Land Use designations. Unlike the Proposed Project, this Alternative would not require any discretionary requests involving a zone change, a General Plan Amendment or adoption of a Specific Plan. Accordingly, impacts from consistency with land use plans would be less than significant. However, the constructing a convention center on the Project Site would create potential use conflicts with the existing land uses in the surrounding areas. The surrounding area is comprised of a mix of low-to medium-density residential, commercial, motel, and office uses. The placement of a convention center directly adjacent to these land uses could create conflicts caused by the concentration of traffic and noise on site when events are being hosted at the convention center. This would result in a significant and unavoidable impact.

### **Public Utilities**

With the exception of solid waste, impacts on public utilities under the Proposed Project would be considered less than significant.

#### *Water*

The Convention Center Alternative is estimated to utilize approximately 250,975 gallons per day (gpd) of water. As shown in Table VI.B.3-1, this Alternative would consume a net decrease of 70,377 gpd as compared to the existing conditions. As compared to the Proposed Project, this represents an approximate 62 percent decrease in water demands.

Similar to the Proposed Project, Ordinance No. 170,978 would apply to this Alternative, resulting in increased water conservation measures. Since water demand under this Alternative would be less than existing water demand and is already accounted for in the 2005 UWMP, impacts associated with water availability would be less than significant.

#### *Wastewater*

Wastewater generation under this Alternative is estimated to be 313,600 gpd. As shown in Table VI.B.3-2, this Alternative would generate a net decrease of approximately 210,400 gpd of wastewater as compared to the existing conditions, and would result in a net decrease of approximately 603,400 gpd as compared to the Proposed Project. Similar to the Proposed Project, it is expected that the existing wastewater infrastructure would be sufficient to handle the increased demands from this Alternative. Therefore, impacts with regard to wastewater would be considered less than significant for this Alternative.

**Table VI.B.3-1  
Estimated Water (Potable) Consumption by the Convention Center Alternative**

Land Use	Unit/Quantity	Water Use (gal/day/unit) <sup>a</sup>	Total (gpd)	Total (AF/year)
<b>Existing Uses<sup>b</sup></b>	--	--	321,139	360
<b>Convention Center Alternative</b>				
Exhibition, Meeting, and Ballroom Space	400,000 sf	0.36 gal/sf/day	144,000	161
Hotel	650 rooms (455,000 sf)	150 gal/room/day	97,500	109
Casino	321,000 sf	0.6 gal/sf/day <sup>c</sup>	9,475	11
<b>Total Alternative Water Demand</b>			<b>250,975</b>	<b>281</b>
<b>Total Net Water Demand</b>			<b>70,164</b>	<b>-79</b>
<i>Notes:</i>				
<i>sf: Square feet</i>				
<i>AFY: Acre feet per year.</i>				
<i><sup>a</sup> Based on 120% of the County Sanitation Districts of Los Angeles County wastewater generation rates.</i>				
<i><sup>b</sup> Water Supply Assessment: Hollywood Park Redevelopment Project.</i>				
<i><sup>c</sup> Hollywood Park Project, Utilities and Infrastructure Technical Report, Hall &amp; Foreman, August 29, 2008.</i>				
<i>Source: Christopher A. Joseph &amp; Associates, July 2008.</i>				

**Table VI.B.3-2  
Estimated Wastewater Generation by the Convention Center Alternative**

Land Use	Unit/Quantity	Generation Rate (gal/day/unit) <sup>a</sup>	Total (gpd)
<b>Existing Uses<sup>b</sup></b>	--	--	<b>524,000</b>
<b>Convention Center Alternative</b>			
Exhibition, Meeting, and Ballroom Space	400,000 sf	0.30 gal/sf/day	120,000
Hotel	650 rooms (455,000 sf)	125 gal/room/day	81,250
Casino	321,000 sf	0.35 gal/sf/day	112,350
<b>Total Wastewater Demand</b>			<b>313,600</b>
<b>Net Wastewater Demand</b>			<b>-210,400</b>
<i>Notes:</i>			
<i>sf: Square feet</i>			
<i><sup>a</sup> Based on the County Sanitation Districts of Los Angeles County wastewater generation rates.</i>			
<i><sup>b</sup> Hollywood Park Project, Utilities and Infrastructure Technical Report, Hall &amp; Foreman, August 29, 2008.</i>			
<i>Source: Christopher A. Joseph &amp; Associates, June 2008.</i>			

### Energy

#### Electricity

As shown in Table VI.B.3-3, below, this Alternative would generate the demand for approximately 18,470,550 KW-hr/year of electricity. As compared to existing conditions, this Alternative would result in a decrease of electricity demand by approximately 7,539,454 KW-hr/year. As compared to the Proposed Project, this Alternative would result in a decrease of electricity demand by approximately 14,376,298 KW-hr/year. Similar to the Proposed Project, it is expected that existing electrical facilities

would be sufficient to handle the demand from this Alternative. Therefore, it is anticipated that impacts with respect to electricity demand would be considered less than significant for this Alternative.

**Table VI.B.3-3  
Estimated Electricity Demands – Convention Center Alternative**

Land Use	Unit/Quantity	Demand (Kilowatt hours/unit/year) <sup>a</sup>	Total (kilowatt hours/year)
<b>Existing Uses <sup>b</sup></b>	--	--	<b>26,010,004</b>
<b><i>Convention Center Alternative</i></b>			
Exhibition, Meeting, and Ballroom Space	400,000 sf	12.95 KW-Hr/sf/yr	5,180,000
Hotel	650 rooms (455,000 sf)	9.95 KW-Hr/sf/yr	4,527,250
Casino	321,000 sf	27.3 KW-Hr/sf/yr	8,763,300
<b>Total Convention Center Alternative Electricity Demand</b>			<b>18,470,550</b>
<b>Net Electricity Demand</b>			<b>-7,539,454</b>
<i>Notes:</i>			
<i>sf: Square feet</i>			
<i><sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise.</i>			
<i><sup>b</sup> Hollywood Park Project, Utilities and Infrastructure Technical Report, Hall &amp; Foreman, August 29, 2008.</i>			
<i><sup>c</sup> Based on existing electricity demands for the casino as provided by the Hollywood Park Land Company.</i>			
<i>Source: Christopher A. Joseph &amp; Associates, June 2008.</i>			

### Natural Gas

As shown in Table VI.B.3-4, this Alternative would result in a total demand for natural gas of 4,615,800 cubic feet per month. This Alternative would generate net increase in demand of approximately 720,900 cubic feet of natural gas per month as compared to existing conditions. In comparison to the Proposed Project, which would generate a net total demand for 23,765,926 cf of natural gas per month, demands for natural gas under this Alternative would be reduced by approximately 23,045,026 cubic feet of natural gas per month. Similar to the Proposed Project, it is expected that existing natural gas infrastructure would be sufficient to serve the needs of this Alternative. Therefore, impacts with regard to natural gas demand would be considered less than significant for this Alternative.

### *Solid Waste*

The amount of construction waste generated under this Alternative would be less than the construction waste generated under the Proposed Project as this Alternative would develop a smaller Project overall, and it would retain the current operation, location and configuration of the casino use. As shown in Table VI.B.3-5, this Alternative would generate approximately 46,035 tons of demolition debris and 1,663 tons of construction debris, for a total of 47,698 tons of demolition and construction debris. As compared to the Proposed Project, this Alternative would result in a decreased generation of solid waste by approximately 32,897 tons. Accordingly, demands for solid waste disposal needs would be decreased as compared to the Proposed Project, and it is expected that regional landfill capacity would be able to

accommodate the construction solid waste generated by this Alternative. Impacts with respect to construction-related solid waste would be considered less than significant under this Alternative.

**Table VI.B.3-4  
Estimated Natural Gas Consumption – Convention Center Alternative**

Land Use	Unit/Quantity	Demand Rate <sup>a</sup>	Total (cf/month)
<b>Existing Uses <sup>b</sup></b>	--	--	<b>3,894,900</b>
<b>Convention Center Alternative</b>			
Exhibition, Meeting, and Ballroom Space	400,000 sf	2 cf/sf/month	800,000
Hotel	650 rooms (455,000 sf)	5 cf/sf/month	2,275,000
Casino	321,000 sf	4.80cf/sf/month	1,540,800
<b>Total Natural Gas Demand</b>			<b>4,615,800</b>
<b>Net Natural Gas Demand</b>			<b>720,900</b>
<i>Notes:</i>			
<i>sf: Square feet</i>			
<i><sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise.</i>			
<i><sup>b</sup> Hollywood Park Land Company, June 8, 2007.</i>			
<i>Source: Christopher A. Joseph &amp; Associates, July 2008.</i>			

**Table VI.B.3-5  
Estimated Construction and Demolition Debris – Convention Center Alternative**

Construction Activity	Size (sf)	Rate (lbs./sf) <sup>a</sup>	Generated Waste (tons)
<b>Demolition-Existing Uses</b>			
Main Building/Grandstand	594,000	155	46,035
<i>Subtotal</i>			<b>46,035</b>
<b>Construction-Convention Center Alternative</b>			
Exhibition, Meeting, and Ballroom Space	400,000 sf	3.89	778
Hotel	650 rooms (455,000 sf)	3.89	885
<i>Subtotal</i>			<b>1,663</b>
<b>Total</b>			<b>47,698</b>
<i><sup>a</sup> Generation rates for demolition, construction and renovation are derived from the Characterization of Building-Related Construction and Demolition Debris in the United States, U.S.E.P.A., Report No. EPA530-R-98-101, June 1998.</i>			
<i>Source: Christopher A. Joseph &amp; Associates, July 2008.</i>			

As shown in Table VI.B.3-6, operational solid waste generation for this Alternative would be approximately 4,964 pounds of solid waste per day which would be a net decrease of approximately 341 ponds per day as compared to the existing conditions. As compared to the Proposed Project, this Alternative would result in a decreased generation of solid waste by approximately 12,120 pounds per day. However, operational-related solid waste impacts would be significant and unavoidable as regional

landfill capacity for the life of the Alternative beyond 2015 has not been accommodated. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) operational solid waste impacts would be significant and unavoidable on project-specific and cumulative level.

**Table VI.B.3-6  
Estimated Operational Solid Waste Generation – Convention Center Alternative**

<b>Land Use</b>	<b>Unit/Quantity</b>	<b>Demand Rate <sup>a</sup></b>	<b>Total (pounds/day)</b>
<b>Existing Uses <sup>b</sup></b>	--	--	<b>4,964</b>
<b>Convention Center Alternative</b>			
Exhibition, Meeting, and Ballroom Space	400,000 sf	0.006 lbs/sf/day	2,400
Hotel	650 rooms (455,000 sf)	2.0 lbs/room/day	1,300
Casino	321,000 sf	0.005 lbs/sf/day	1,605
<b>Total Solid Waste Generation</b>			<b>5,305</b>
<b>Net Solid Waste Generation</b>			<b>-341</b>
<i>Notes:</i>			
<i>sf: Square feet</i>			
<i><sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981.</i>			
<i><sup>b</sup> Hollywood Park Land Company, June 8, 2007.</i>			
<i>Source: Christopher A. Joseph &amp; Associates, June 2008.</i>			

## Public Services

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

### *Police Protection*

The development of a Convention Center Alternative would place an increased demand on the IPD for police protection services. Similar to the Proposed Project, this Alternative would generate tax revenue that the City could use to hire new officers. Additionally, this Alternative would incorporate mitigation measures to reduce the potential for increasing demands upon police services in the area, such as strategically positioned lighting, building security systems, and implementation of an on-site security plan. This Alternative would not include a police substation on the Project Site, however, impacts on police protection services under this Alternative would be less than significant.

### *Fire Protection*

The projected demand for fire protection services is based on the amount and size of new structures on a site. The Convention Center Alternative would result in the development of approximately 855,000 sf of new development in addition to the continued operation of the 321,000 sf casino. As such, this Alternative would place an increased demand on the LACoFD for fire protection services. As discussed

in Section IV.K.2, Fire Protection, fire flow requirements would be determined by the LACoFD. It is anticipated that the required fire flow would be accommodated by this development as such flows are already able to serve the emergency needs of the racetrack facility. Overall, like the Proposed Project, the impact on fire protection services under this Alternative would be less than significant.

#### *Schools*

This Alternative would not involve the development of dwelling units and would therefore not generate any new students. Accordingly, this Alternative would have no operational impact on schools. However, unlike the Proposed Project, this Alternative does not include a 4-acre site for civic uses, and the potential for the Inglewood Unified School District to develop a school site within the Project Site would be precluded. As a result, the Proposed Project could be considered more beneficial than the Alternative since it potentially provides for a new elementary school in Inglewood.

#### *Recreation and Parks*

This Alternative would include the new development of a convention center that would serve both business and recreational demands and would not generate any new housing within the City. While the Proposed Project would include 25 acres of parks and recreation and open space, this Alternative would increase recreational and business-related services, and would not generate any additional demands for recreation facilities. Impacts to recreation and parks would be considered less than significant for this Alternative; however, the Proposed Project could be considered more beneficial since it would provide a substantial public benefit by increasing the amount of common open space that is available within the City.

#### *Libraries*

This Alternative would not generate any residents to the City and would therefore not generate any new impacts to the Inglewood Library system. Accordingly, there would be no impacts with regard to library services. However, the Proposed Project could be more beneficial than the Convention Center Alternative since the Proposed Project could potentially allocate a four-acre civic site to be used as a joint use school, including a library, which could be utilized by all City residents.

### **Traffic and Transportation**

Under the Hollywood Park Convention Center Alternative, the existing Hollywood Park Racetrack will be removed but the existing Casino will continue to operate. A convention center facility containing 300,000 square feet of exhibition space, 50,000 square feet of meeting space, 50,000 square feet of ballroom space, and a 650-room hotel would be developed. The convention center would also be designed in a manner that would allow the facility to operate as a sports/entertainment arena with 13,500 seats for basketball games and other special events.

For purposes of the trip generation forecast, it is assumed that the convention center facility would function as an exhibition space during the weekday AM peak hour analysis time period, since the arena is



not anticipated to be utilized during this time period. For the weekday PM peak hour and the weekend mid-day peak hour analysis time periods, it is assumed that the facility would function as a sports/entertainment arena, since an arena use typically has higher trip generation potential than an exhibition space during the weekday PM peak hour and the weekend mid-day peak hour.

### *Hollywood Park Convention Center Weekday Trip Generation Summary*

The weekday trip generation forecast for the Hollywood Park Convention Center Alternative is summarized in Table VI.B.3-7. As presented in Table VI.B.3-7, the Convention Center Alternative is expected to generate an additional 587 vehicle trips (361 inbound trips and 226 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Convention Center Alternative is expected to generate 1,259 fewer vehicle trips (1,059 more inbound trips and 2,318 fewer outbound trips). Over a 24-hour period, the Convention Center Alternative project is forecast to generate an additional 1,866 daily trip ends during a typical weekday (933 inbound trips and 933 outbound trips).

**Table VI.B.3-7  
Convention Center Alternative Weekday Trip Generation<sup>a</sup>**

Land Use	Size	Daily Trip Ends <sup>b</sup> Volumes	AM Peak Hour Volumes <sup>b</sup>			PM Peak Hour Volumes <sup>b</sup>		
			In	Out	Total	In	Out	Total
Exhibition Space/Arena	300,000 GSF	9,338	105	18	123	1,084	50	1,134
Hotel	650 Rooms	5,798	253	183	436	223	232	455
Meeting Space	50,000 sf	1,144	49	32	81	24	58	82
Ballroom Space	50,000 sf	1,144	49	32	81	24	58	82
Internal Capture	--	(808)	(35)	(25)	(60)	(27)	(35)	(62)
Existing Racetrack to be Removed <sup>c</sup>	(10,000) Attend.	(14,750)	(60)	(14)	(74)	(269)	(2,681)	(2,950)
<b>Net Total Trip Generation</b>		<b>1,866</b>	<b>361</b>	<b>226</b>	<b>587</b>	<b>1,059</b>	<b>(2,318)</b>	<b>(1,259)</b>

*Notes:*

<sup>a</sup> Source: ITE "trip Generation" 7<sup>th</sup> Edition, 2003.

<sup>b</sup> Trips are one-way traffic movements, entering or leaving. See Appendix G for additional data regarding assumptions for trip characteristics.

Source: Linscott Law and Greenspan Engineers, Revised Traffic Study August 1, 2008. (See Appendix G-1 for internal trip reduction assumptions).

### *Hollywood Park Convention Center Weekend Trip Generation Summary*

The weekend trip generation forecast for the Hollywood Park Convention Center Alternative is summarized in Table VI.B.3-8. As presented in Table VI.B.3-8, the Convention Center Alternative is expected to generate an additional 1,781 vehicle trips (1,685 inbound trips and 96 outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, the Convention Center Alternative project is forecast to generate an additional 7,722 daily trip ends during a typical weekend day (3,861 inbound trips and 3,861 outbound trips).

**Table VI.B.3-8  
Convention Center Alternative Weekend Trip Generation<sup>a</sup>**

Land Use	Size	Daily Trip Ends <sup>b</sup> Volumes	Mid Day Peak Hour Volumes <sup>b</sup>		
			In	Out	Total
Exhibition Space/Arena	300,000 GSF	9,338	2,873	Nom.	2,873
Hotel	650 Rooms	6,826	317	249	566
Meeting Space	50,000 sf	456	31	33	64
Ballroom Space	50,000 sf	456	31	33	64
Internal Capture	--	(774)	(38)	(32)	(70)
Existing Racetrack to be Removed <sup>c</sup>	(10,000) Attend.	(8,580)	(1,529)	(187)	(1,716)
<b>Net Total Trip Generation</b>		<b>7,722</b>	<b>1,685</b>	<b>96</b>	<b>1,781</b>
<i>Notes:</i>					
<sup>a</sup> Source: ITE "trip Generation" 7 <sup>th</sup> Edition, 2003.					
<sup>b</sup> Trips are one-way traffic movements, entering or leaving. See Appendix G for additional data regarding assumptions for trip characteristics.					
Source: Linscott Law and Greenspan Engineers, Revised Traffic Study August 1, 2008. (See Appendix G-1 for internal trip reduction assumptions).					

### **Traffic Impact Comparison**

#### *Weekday Conditions*

A qualitative review was conducted to determine if the Convention Center Alternative project would likely result in an increase in project impacts when compared to the Proposed Project. During the weekday conditions, the Convention Center Alternative project is expected to generate 1,017 fewer vehicle trips than the Proposed Project during the AM peak hour. During the PM peak hour, the Convention Center Alternative project is expected to generate 1,220 fewer vehicle trips than the proposed project. Over a 24-hour period, the Convention Center Alternative project is forecast to generate 15,356 fewer daily trip ends during a typical weekday. Based on this comparison, it is determined that the Convention Center Alternative project would likely result in an overall decrease in traffic impacts when compared to the Proposed Project during the weekday AM and PM peak hours.

#### *Weekend Conditions*

A qualitative review was conducted to determine if the Convention Center Alternative project would likely result in an increase in project impacts when compared to the Proposed Project. During the weekend conditions, the Convention Center Alternative project is expected to generate 407 more vehicle trips than the Proposed Project during the mid-day peak hour and 17,786 fewer trips over a 24-hour typical weekend period. Based on this comparison, it is determined that the Convention Center Alternative project would likely result in an overall increase in traffic impacts when compared to the Proposed Project during the weekend mid-day peak hour.

Overall, the Convention Center Alternative would result in a less than significant impact to traffic and transportation with implementation of mitigation measures as proposed for the Proposed Project. However, given the level of proposed mitigation measures, the fact that Convention Center Alternative would require a large public subsidy, and the Alternative does not contain any retail or office/commercial uses that could generate a source of revenue to fund implementation of the street and frontage improvements, it may be necessary to locate a source of funding to implement the level of improvements proposed by the Project’s mitigation measures to achieve a less than significant impact to traffic and transportation.

**Parking**

As shown in Table VI.B.3-9, the Convention Center Alternative would be required by the City of Inglewood Municipal Code to provide 5,612 parking spaces.

**Table VI.B.3-9  
City of Inglewood Commercial Parking Requirements – Convention Center Alternative**

<b>Land Use</b>	<b>Size (sq. ft./units)</b>	<b>Parking Requirements</b>	<b>Minimum Requirement</b>
Exhibition, Meeting, and Ballroom Space	400,000 sf	-- <sup>a</sup>	955
Hotel	650 rooms (455,000 sf)	-- <sup>b</sup>	377
Casino	321,000 sf	1/75 SF GFA	4,280
<b>Total Parking Required</b>			<b>5,612</b>
<sup>a</sup> For facilities larger than eighteen thousand square feet in floor area: sixty parking spaces, plus one parking space for each additional four hundred square feet of gross floor area in excess of eighteen thousand square feet of floor area. <sup>b</sup> For facilities having more than one hundred bedrooms: one hundred two parking spaces, plus one parking space for each additional two bedrooms or any other room that can be used for sleeping purposes. Source: City of Inglewood Municipal Code.			

Under this Alternative, it is assumed the applicant would provide the code-required parking associated with the convention center, hotel, and casino. Therefore, impacts with respect to parking under this Alternative would be less than significant.

**Conclusion**

The Convention Center Alternative would not reduce the following significant and unavoidable impacts to levels of insignificance associated with the Proposed Project: construction-related air quality, construction-related noise, population and housing, and operational solid waste.

The Convention Center Alternative would avoid the significant and unavoidable impact from operational air quality.

The Convention Center Alternative, due to its incompatibility with the existing community, results in a significant and unavoidable land use impact that does not also occur with implementation of the Proposed Project.

As described in Table VI.B.3-10, below, the Convention Center Alternative would not achieve many of the Project Objectives as it represents a scenario in which the project does not go forward. It should also be noted that although this Alternative is considered a reasonably foreseeable alternative because it is permitted under existing zoning, there is no indication that a convention center is an economically viable alternative. Moreover, this alternative is a sub-set of the “No Project” alternative and is not an alternative chosen as being capable of reducing project impacts.

**Table VI.B.3-10  
Assessment of Convention Center Alternative to Meet the Project Objectives**

<b>Project Objectives</b>	<b>Assessment of the Alternative to Meet Objectives</b>
1. To contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space;	The Convention Center Alternative would not fully satisfy this objective as it would not be a typical mixed-use development and would not include a residential component.
2. To provide an economically viable project that promotes the City’s economic well-being by significantly increasing property and sales tax revenues and providing high-quality retail uses and the opportunity for transient occupancy tax;	There is no evidence to suggest that a convention center is economically viable as the City does not have the resources to purchase, develop and operate a convention center. Thus, the Convention Center Alternative would not satisfy this project objective to promote the City’s economic well-being.
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.	The Convention Center Alternative would be consistent with this project objective, as the Casino and Gambling facility would continue to operate.
4. To provide land for a civic/public use.	The Convention Center Alternative would satisfy this objective.
5. To create exciting community park and open space areas, that exceed the City’s existing General Plan goals of one acre per 1,000 residents, in a manner that meets the needs of the proposed development and is beneficial to the overall community;	The Convention Center Alternative would not satisfy this objective.
6. To add a variety of ownership-housing opportunities, of different product types and prices, in an area of the greater Los Angeles region that is job-rich, thus creating a better balance of housing and employment opportunities;	The Convention Center Alternative would not satisfy this objective.
7. To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;	The Convention Center Alternative would not satisfy this objective.
8. To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and public open space within portions of the Merged Redevelopment Project Area;	The Convention Center Alternative would assist in eliminating and preventing the spread of blight through the development of a new convention center and hotel, but would do so in a different manner as the Proposed Project since no new housing opportunities would be created.

Project Objectives	Assessment of the Alternative to Meet Objectives
9. To create safe, secure and defensible spaces through project design, while also allowing public spaces, such as parks and retail, to be open to the public;	The Convention Center Alternative would satisfy this objective, but to a different degree than the Proposed Project.
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project;	The Convention Center Alternative would satisfy this objective.
11. To promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways in a mixed-use project which integrates housing with employment opportunities;	The Convention Center Alternative would not satisfy this objective.
12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities; and	The Convention Center Alternative would be designed to promote a safe and pedestrian-oriented environment and would satisfy this objective, but in a different manner and degree than the Proposed Project.
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.	The Convention Center Alternative would satisfy this objective.

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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

### C. ALTERNATIVE RU 800

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This Alternative was selected as a possible scenario for future development to allow for a reduced development scenario that would potentially reduce the project’s environmental impact while achieving some, but not all of the project objectives. Specifically, Alternative RU 800 would result in the development of approximately 800 dwelling units on the Hollywood Park Racetrack site. This Alternative would retain the Racetrack and Grandstand, and would include the removal and discontinuation of the casino. The existing barns would be relocated to the infield area of the Main Track and the practice track would be removed. To accommodate residential development, the surface parking areas would be reduced.

Compared to the Proposed Project, this Alternative would result in a decrease of 2,195 dwelling units and elimination of land use otherwise proposed for retail, civic, hotel, office, casino, open space, and community space. A summary of the planned development under this Alternative is provided in Table VI.C-1, below.

**Table VI.C-1**  
**Development Summary of Alternative RU 800**

PROPOSED DEVELOPMENT	UNITS/ FLOOR AREA (NET) <sup>a</sup>
Residential	800 du
Retail	N/A
Grandstand (Retention of Existing Facility)	Retention of Existing Facility
Casino	N/A
Civic Use	N/A
Hotel	N/A
Office	N/A
Open Space	N/A
Community Space (HOA Recreation Facility)	N/A
<b>Notes</b>	
<sup>a</sup> The use of net floor area is calculated per the Inglewood Municipal Code for purposes of determining the developed floor area. All floor area values are expressed in square feet (sf). Source: Hollywood Park Land Company, July 2008.	

## **Aesthetics**

### *Views and Urban Design*

Impacts on views and urban design under the Proposed Project would be less than significant. Under Alternative RU 800, the Project Site would be redeveloped in a manner that retains the existing Racetrack and Grandstand, removes the existing Casino, and adds approximately 800 single family dwelling units. This Alternative would retain the visual character of the existing grandstand area and would redevelop the areas currently used as surface parking into single family dwelling units. As compared to the Proposed Project, open space would decrease by 25 acres and civic, hotel, office, open space, and community space would be eliminated. While the density, mix of land uses and overall community character would differ, the urban design of the infill development would be substantially similar. Although this Alternative would alter the views of and from the Project Site, the Alternative would be designed to yield resulting views and urban design characteristics that would be consistent with the Merged Redevelopment Plan and that would provide several visual improvements as compared to the existing conditions of the Project Site. Accordingly, impacts to views and urban design under this Alternative would be less than significant.

### *Light and Glare*

Impacts on light and glare under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, Alternative RU 800 would generate new sources of light and glare in the form of street lighting, and structural illumination from the 800 new dwelling units. In contrast to the Proposed Project, this Alternative would retain the existing grandstand which generates a substantial amount of light pollution. Compared to the Proposed Project, which would reduce the nighttime lighting impacts through the elimination of the racetrack, Alternative RU 800 would retain the racetrack and the associated light and glare impacts would remain. Therefore, as compared to the Proposed Project, light and glare impacts would be increased under this Alternative. However, since light and glare impacts under this Alternative would be no worse than the existing conditions, impacts would be considered less than significant.

### *Shade and Shadow*

The Proposed Project would result in a less than significant impact with respect to shade/shadow. Alternative RU 800 would be developed with single family homes with most new structures substantially below the 75 foot height of the buildings associated with the Proposed Project. Unlike the Proposed Project, Alternative RU 800 does not include the hotel structure which could be up to 150 feet. Therefore, Alternative RU 800 would not generate any new significant shade or shadow impacts upon adjacent land uses. Therefore, impacts under this Alternative with respect to shade or shadow would be less than significant.

## Air Quality

### *Construction*

The Proposed Project would result in a significant and unavoidable impact with respect to air quality as a result of construction activities. Alternative RU 800 would require a shorter construction duration than that assumed for the Proposed Project because although the barns would be relocated to the infield area of the Main Track, only 800 dwelling units (compared to 2,995 units under the Proposed Project) would be constructed on the Project Site, and no retail, office or civic uses would be constructed. Additionally, this Alternative would retain the racetrack and grandstand and would require less demolition activity as compared to the Proposed Project. As such, pollutant emissions during the Alternative RU 800 construction period would be less than the pollutants emitted during the construction period for the Proposed Project. However, assuming that Alternative RU 800 would require more than 13 acres to be graded per day, construction emissions would exceed the SCAQMD regional and localized significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub> and PM<sub>10</sub>. As such, Alternative RU 800 daily construction emissions would result in a significant and unavoidable air quality impact.

### *Operational*

Alternative RU 800 would result in fewer mobile and area source emissions than the proposed project due to the elimination of proposed commercial, retail, hotel, civic and casino/gaming uses and 2,195 dwelling units. Weekday emissions would be approximately 185 ppd for VOC, 43 ppd for NO<sub>x</sub>, 494 ppd for CO, one ppd for SO<sub>x</sub>, six ppd for PM<sub>2.5</sub>, and 33 ppd for PM<sub>10</sub>. Weekend emissions would be approximately 186 ppd for VOC, 45 ppd for NO<sub>x</sub>, 507 ppd for CO, one ppd for SO<sub>x</sub>, 7 ppd for PM<sub>2.5</sub>, and 35 ppd for PM<sub>10</sub>. The reduction in development would eliminate the NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub> regional operational impact associated with the Proposed Project. However, VOC operational emissions would exceed the SCAQMD significance threshold. As such, Alternative RU 800 daily operational emissions would result in a significant and unavoidable air quality impact.

Alternative RU 800 would result in fewer daily vehicle trips than the Proposed Project and, as such, would result in less localized CO concentrations. Therefore, similar to the proposed project, Alternative RU 800 would result in a less than significant localized CO impact.

Similar to the Proposed Project, Alternative RU 800 would not be consistent with the land use designation and the population growth forecasts utilized to calculate the emissions budget in the most recent AQMP. As such, Alternative RU 800 would not be compatible with the AQMP and would result in a significant cumulative air quality impact. Due to the reduced size, density, and type of development, Alternative RU 800 would generate less GHG emissions than the Proposed Project. In addition, Alternative RU 800 would be typical of an urban environment, would not generate a disproportionate amount of vehicle miles of travel, and would not have unique and disproportionately high fuel consumption characteristics. Similar to the Proposed Project, Alternative RU 800 would result in a less than significant global warming impact. While Alternative RU 800 would result in reduced air quality emissions as compared to



the Proposed Project, both scenarios would exceed the SCAQMD thresholds, thereby resulting in significant and unavoidable air quality impacts.

### **Geology and Soils**

Impacts on geology and soils under the Proposed Project would be less than significant after mitigation. The same geological conditions and associated seismic risks would occur under Alternative RU 800 as described for the Proposed Project. Development of the Proposed Project has been determined generally feasible from a geotechnical perspective. The geotechnical recommendations associated with site preparation, earthwork and foundations and Restricted Use Zone (RUZ) that are identified in the EIR would also apply under this Alternative with minor modifications. Therefore, the geology and soils impacts under Alternative RU 800 would be less than significant.

### **Hazardous Materials and Risk of Upset**

#### *Construction*

Construction-related impacts on hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. This Alternative would retain the racetrack and demolish the casino and the Practice Track. The barns would be relocated to the infield of the Main Track. As such, this Alternative would generate potentially significant impacts associated with potential exposure to ACMs and LBP during demolition. ACMs and LBP present within the existing facilities that are proposed to remain would not pose a health hazard, as these materials would remain stable and would not be disturbed. Similar to the Project, the impacts associated with potential exposure to ACMs and LBP during demolition would be mitigated to less-than-significant levels with adherence to all applicable laws and regulations and implementation of the mitigation measures prescribed for the Proposed Project. Therefore, Alternative RU 800 would result in less than significant impacts after mitigation with respect to hazardous materials and risk of upset during construction.

#### *Operational*

Operational impacts with respect to hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Under Alternative RU 800, the retail, office, hotel, and civic uses would not be constructed. The existing racetrack and proposed residential uses would not require or generate substantial hazardous materials. Therefore, this Alternative would have a less than significant impact with respect to hazardous materials during operation.

### **Cultural Resources**

#### *Archaeological Resources*

A cultural resources records search was conducted for the Hollywood Park Redevelopment Project Property by the South Central Coastal Information Center, California Historical Resources Information System in July 2007. Based on a review of all recorded archaeological sites within a ½-mile radius of the

Project Site and cultural resource reports on file, database records for all California Points of Historical Interest, California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places, and the California Historical Resources Inventory listings, no significant cultural resources are known to be located on the Project Site. Therefore, neither the Project nor Alternative RU 800 would result in any impacts to known cultural resources. Nevertheless, mitigation measures are proposed to reduce the impacts to less than significant levels for unknown cultural resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.

### *Historic Resources*

Impacts on historic resources under the Proposed Project would be less than significant after mitigation. This Alternative would retain the existing racetrack, but would demolish the casino and practice track, and relocate the barns to the infield of the Main Track. Through a comprehensive historic resource analysis which included a field investigation of the Project Site and surrounding area, review of building permit records, maps, books and photographs, it was determined, by an evaluation of criteria used by the California Register of Historical Resources and the National Register of Historic Places, that none of the existing buildings located on the Project Site are considered significant cultural resources pursuant to CEQA. As such, Alternative RU 800 would result in a less than significant impact to historic resources.

## **Hydrology/Water Quality**

### *Construction*

Construction-related impacts on water quality under the Proposed Project would be less than significant after mitigation. Under Alternative RU 800, portions of the Project Site would continue to operate under the current NPDES permit. Water quality impacts currently associated with horseracing facilities would be mitigated to a less-than-significant level by implementing standard best management practices and permitting reporting actions that are already in place. The redevelopment of a portion of the site to accommodate new residential uses would have similar water quality impacts as the proposed project. Again, implementation of best management practices and compliance with the RWQCB regulations would ensure impacts are reduced to less-than-significant levels. Water quality impacts under this Alternative would be less than significant after mitigation.

### *Operational*

Operational impacts on water quality under the Proposed Project would be less than significant after mitigation. Under Alternative RU 800, the amount of pervious surface area would be increased as compared to the Proposed Project. This Alternative would retain the Grandstand and the Main Track, but since the barns would be relocated to the infield of the Main Track, the Project Site would become less pervious. Under this alternative, a smaller volume of surface water would be able to be retained on site thus generating more surface water runoff into the storm drains. Similar to the Proposed Project, this Alternative may be able to retain and control storm water flows in a manner that would ensure a less-than-

significant impact upon the existing storm water infrastructure. Therefore, this Alternative would result in a less than significant impact after mitigation with respect to operational hydrology/water quality.

## Noise

### *Construction*

Impacts on noise due to construction activities under the Proposed Project would be significant and unavoidable after mitigation. Construction activity associated with Alternative RU 800 would generally result in similar noise levels as the Proposed Project. Therefore, it is anticipated that even with the implementation of comparable mitigation measures prescribed for the Proposed Project, mitigated construction noise levels for this Alternative would also likely exceed the five dBA significance threshold at the sensitive receptors near the Project Site. Construction-related noise exposure would however be shorter in duration given the smaller project size for this Alternative and construction activity associated with the alternative would comply with the standards established in the Noise Ordinance. Nevertheless, construction noise impacts associated with Alternative RU 800 would be considered significant and unavoidable after mitigation. .

Construction activity associated with Alternative RU 800 would impact thoroughbred horses stabled at the project site. Unexpected noises can frighten or irritate horses and can interfere with their ability to respond to the handler or behave in a relaxed manner. Based on a horse's tendency to be frightened or startled, a sudden increase in noise levels greater than 3 dBA would result in a significant impact. Construction activity that would occur in close proximity to horses would increase ambient noise levels by more than 3 dBA. Alternative RU 800 would require mitigation measures to reduce the exposure of horses to construction noise. These mitigation measures would potentially include, but would not be limited to, scheduling construction activity that would be located near horses during the non-racing season, delaying construction activity while horses are exercising and until they are returned to the stables, temporarily moving stables away from construction areas, and installing noise barriers between where horses are located and construction activity. Even with implementation of mitigation measures horses would be exposed to construction noise levels 3 dBA greater than existing ambient noise levels. As such, construction activity under this Alternative would significantly impact horses on the project site.

### *Operation*

Alternative RU 800 would result in fewer daily vehicle trips than the Proposed Project and would consequently result in lower mobile noise levels. Mobile noise is not anticipated to increase by more than three dBA CNEL and, as such, this Alternative would result in a less than significant impact on the ambient noise environment. Additionally, Alternative RU 800 would include residential stationary noise sources comparable to those discussed for the Proposed Project, and similar to the Proposed Project, Alternative RU 800 would also result in a less than significant stationary source operational noise impact.

Overall, Alternative RU 800 would result in similar stationary source operational noise and less mobile source noise as the Proposed Project. Therefore, like the Proposed Project, operational noise impacts under this Alternative would be less than significant.

### **Population, Housing and Employment**

Impacts on population, housing and employment under the Proposed Project would be significant and unavoidable due to a technical inconsistency with regional housing and population growth forecasts.

#### *Construction Impacts*

The Proposed Project would generate approximately 17,105 construction-related jobs over the 10-year buildout and stabilization horizon of the Proposed Project. It is estimated that employment opportunities associated with the construction of Alternative RU 800 would be substantially less than the Proposed Project. Like the Proposed Project, these temporary construction-related jobs will not indirectly create an increase in the City's population or the need for housing. Also, although indirect impacts upon regional population and housing conditions would be decreased under this Alternative as the Proposed Project would provide more construction jobs and result in a more beneficial construction employment scenario, this Alternative would still provide some temporary construction jobs and impacts would be considered less than significant, although increased as compared to the Proposed Project.

#### *Operation Impacts*

##### *Employment Displacement Impacts*

Unlike the Proposed Project, Alternative RU 800 would retain horse racing at the Hollywood Park Racetrack for the foreseeable future and therefore, would not result in any employment displacement of the associated jobs. Although due to economic conditions within the horseracing industry, it is speculative to predict how long horseracing will continue to operate on-site. Additionally, Alternative RU 800 eliminates the casino on-site and therefore would displace the 1,017 jobs associated with the casino. The number of jobs generated by Alternative RU 800 is not sufficient to compensate for the number of jobs displaced by the Alternative. Therefore, Alternative RU 800 would result in a significant and unavoidable employment displacement impact.

##### *Employment Generation Impacts*

##### Indirect Employment Growth

The increase in population or the need for housing generated by the new on-site employment generated by the new residential uses on-site under RU 800 would be negligible. Indirect impacts to population and housing demographics generated by the new residential uses of this Alternative would be less than significant.

Direct Employment Growth

Alternative RU 800 would retain the racetrack and include the development of 800 dwelling units. This Alternative would thus result in approximately 104 new jobs associated with operational services and maintenance for the residential uses (i.e., security, landscape, HOA management, etc). In addition to the new jobs created by the residential uses, this Alternative would retain the 1,601 full-time equivalent (FTE) jobs that currently exist from the racetrack. As compared to the Proposed Project, which would generate approximately 517 net new jobs, this Alternative would result in a reduction of jobs as compared to the Proposed Project since this Alternative eliminates the 1,017 jobs associated with the Hollywood Park Casino. This result is inconsistent with the jobs forecasts for Inglewood since the forecast predicts growth in the number of jobs. Although this Alternative creates 104 new jobs from the 800 residential dwelling units proposed, the net result of this Alternative is a loss of 913 jobs, therefore resulting in a significant and unavoidable impact. .

**Table VI.C-2  
Summary of Employment Generation - Alternative RU 800**

Land Use	Full Time	[Seasonal/ Part Time] FTE <sup>a</sup>	Total (Full Time +FTE)
<i>Existing Uses<sup>b</sup></i>			
<b>Hollywood Park Racetrack</b>			
Racing Association Related Employees	374	[522] 193	567
Casual Laborers	885	[404] 149	1,034
<b>Subtotal Hollywood Park Racetrack</b>	<b>1,259</b>	<b>[926] 342</b>	<b>1,601</b>
<b>Hollywood Park Casino</b>	--	--	1,017
<i>Subtotal Existing Jobs</i>			<b>2,618</b>
<i>RU 800</i>			
Land Use	Size	Generation Rate <sup>c</sup>	Total
<b>Hollywood Park Racetrack</b>	N/A	N/A	<b>1,601</b>
<b>Residential</b>	800 du	0.13/du <sup>e</sup>	104
<i>Subtotal Proposed Employment Generation (Proposed Plus Existing)</i>			<b>1,705</b>
<i>Net Total (Proposed less Existing)</i>			<b>(913)</b>
<i>Notes:</i>			
<sup>a</sup> 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.			
<sup>b</sup> Existing employment data provided by Hollywood Park Racing Association.			
<sup>c</sup> Residential Job Generation Study, RRC Associates and the Housing Collaborative (December 2000).			
Source: Hollywood Park Land Company and Christopher A. Joseph & Associates, July 2008.			

### *Population/Housing Impacts*

Alternative RU 800 would involve the construction of 800 new dwelling units resulting in the generation of approximately 2,400 new residents to the City of Inglewood. Compared to the Proposed Project, which would create approximately 2,995 new residential dwelling units, resulting in approximately 8,985 new permanent residents, this Alternative would reduce the amount of housing and population growth created.

### Regional Housing Growth Forecasts

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 this Alternative would add 800 units to the City of Inglewood. 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 SGAC's projection for 2015 by 820 dwelling units. Alternative RU 800 will add an additional 800 dwelling units to the City's housing inventory, resulting in a total of 39,769 dwelling units by 2014. This increase would be inconsistent with the 2008 RTP, as this Alternative would exceed the City's 2015 growth projection by 1,620 dwelling units. However, it should be noted that the 2008 RTP did not anticipate 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. Nevertheless, like the Proposed Project, this Alternative would exceed the housing projections of SCAG, and this impact would be considered technically significant and unavoidable.

### Regional Population Growth Forecasts

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. Alternative RU 800 would add approximately 2,400 persons to the City of Inglewood, which would increase the total population to 121,278 persons by 2014. This Alternative's population increase would not be consistent with the regional growth projections as the population growth would exceed the total anticipated growth for 2015 by 1,093 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. This Alternative would redevelop an existing non-residential use and would require an adoption of a Specific Plan and amendment to the City's General Plan and the Merged Redevelopment Plan for the property. As this Alternative was not anticipated at the time SCAG prepared their 2008 RTP, the anticipated population and housing growth associated with the Alternative was not included within the 2008 RTP update. Nevertheless, like the Proposed Project, the population growth anticipated by this Alternative would not

be consistent with the projections of SCAG, and would result in a technically significant and unavoidable impact.

Notwithstanding the technically significant and unavoidable impact, like the Proposed Project, this Alternative 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. Additionally, the Alternative's creation of 800 newly-constructed dwelling units presents an opportunity for the City to continue its efforts to add high-quality, new housing to its housing stock. Overall, the Alternative 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.

### **Land Use and Planning**

Impacts on land use and planning under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, since residential dwelling units are proposed, Alternative RU 800 would not be consistent with the existing Commercial-Recreation designations of the current Zoning district, General Plan designations, nor Redevelopment Plan Land Use designations. And, the development of residential uses would require a zone change, a General Plan Amendment and adoption of a Specific Plan. However, with the approval of the discretionary actions required for this Alternative to be developed, impacts to consistency with land use plans would be less than significant. However, the placement of 800 dwelling units directly adjacent to a horseracing facility would create potential use conflicts caused by dust, vectors, odors, and racing related noises. This would result in a significant and unavoidable impact to land use compatibility with the existing community.

### **Public Utilities**

With the exception of solid waste from operations, impacts on public utilities under the Proposed Project would be considered less than significant.

#### *Water*

As shown in Table VI.C-3, Alternative RU 800 would generate a demand for approximately 580,464 gallons per day or approximately 650 acre-feet of water per year, representing a net increase of approximately 290 acre-feet of water per year, as compared to the existing conditions. This represents an approximate 19 percent decrease in water consumption as compared to the Proposed Project. As discussed in Section IV. J.1. Water, the 2005 Urban Water Management Plan accounted for some level of redevelopment on the Hollywood Park project site (in addition to the Renaissance and Haagan projects). Based on the formula presented in that Section, 366.36 AF/yr is the total projected water demand for the three developments in the 2005 UWMP based upon available water usage data of the Renaissance and Haagan projects and the projected water demand for Alternative RU 800. Only 360.60 AF/yr was attributed to the three developments in the 2005 UWMP, leaving a deficit of 5.73 AF/yr. At a minimum, this Alternative would be responsible for securing water sources up to this amount.

Ordinance No. 170,978 would still apply to Alternative RU 800, resulting in increased water conservation measures. Also, mitigation measures proposed under the Proposed Project to conserve water would also be implemented under Alternative RU 800. Therefore, impacts associated with water availability under this Alternative would be considered less than significant.

**Table VI.C-3  
Estimated Water Consumption - Alternative RU 800**

Land Use	Unit/Quantity	Water Use (gal/day/unit) <sup>a</sup>	Total (gpd)	Total (AF/year)
<b>Existing Uses Total<sup>b</sup></b>	--	--	321,139	360
<b>Alternative RU 800</b>				
Residential	800 du <sup>c</sup>	336 gal/ day/du	268,800	301
Racetrack/Grandstand	--	--	311,664 <sup>d</sup>	<b>349</b>
<b>Subtotal Proposed</b>	-	-	<b>580,464</b>	<b>650</b>
<b>Total Net Water Demand</b>			<b>259,325</b>	<b>290</b>
<p><i>Notes:</i>            du: Dwelling units            sf: Square feet            AFY: Acre feet per year.  <sup>a</sup> Hall and Foreman, EIR Technical Appendix - Public Utilities Report, May 2008.  <sup>b</sup> Hall and Foreman, EIR Technical Appendix - Public Utilities Report, May 2008.  <sup>c</sup> Assumes all dwelling units are developed as SFD (R-1) to analyze the maximum impact to water demand.  <sup>d</sup> Of the total for existing uses, it was determined the Casino would utilize 9,475 gpd of water. Therefore, it is estimated the racetrack/grandstand would demand the remaining 311,664 gpd of water.</p> <p>Source: Christopher A. Joseph &amp; Associates, July 2008.</p>				

### Wastewater

As shown in Table VI.C-4, Alternative RU 800 would generate approximately 571,650 gpd of wastewater per day, approximately 47,650 gpd above existing conditions. In comparison to the Proposed Project, which is anticipated to generate approximately 393,000 net gpd of wastewater, this Alternative would represent a 345,350 gpd decrease in wastewater generation. Similar to the Proposed Project, it is expected that the existing wastewater infrastructure would be sufficient to handle the net increase in demand. As a result, impacts would remain less than significant. This impact would be reduced as compared to the Proposed Project.

### Energy

#### Electricity

As shown in Table VI.C-5 below, Alternative RU 800 would generate a demand for approximately 21,747,904 kilowatt hours per year (KW-Hr/yr) of electricity, which would represent a decrease of approximately 4,262,100 KW-Hr/yr of electricity as compared to the existing conditions. In comparison to the Proposed Project, which would generate a net demand for 6,836,844 KW-Hr/yr of electricity, this Alternative would result in a decreased demand of approximately 11,098,944 KW-Hr/yr of electricity per



year. Similar to the Proposed Project, it is expected that existing electrical facilities would be sufficient to handle the loads created by this Alternative. Thus, impacts to electricity demands for this Alternative would be considered less than significant.

**Table VI.C-4  
Estimated Wastewater Generation – Alternative RU 800**

Land Use	Unit/Quantity	Generation Rate (gpd/unit) <sup>a</sup>	Total (gallons/day)
<b>Existing</b>			
Existing Uses <sup>b</sup>	--	--	524,000
<b>Subtotal Existing:</b>			
<b>Alternative RU 800</b>			
Residential	800 du	200gal/unit/day	160,000
Racetrack/Grandstand	--	--	411,650 <sup>c</sup>
<b>Subtotal Alternative</b>			<b>571,650</b>
<b>Total Net Wastewater Generation</b>			<b>47,650</b>
<p><i>Notes:</i>                      du: Dwelling units                      sf: Square feet  <sup>a</sup> Generation Rates based on County Sanitation Districts of Los Angeles County wastewater generation rates. Uses not listed are estimated by the closest type of use available in the table.  <sup>b</sup> Hall &amp; Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.  <sup>c</sup> Of the total for existing uses, it was determined the Casino would generate 112,350 gpd of wastewater. Therefore, it is estimated the racetrack/grandstand would generate the remaining 411,650 gpd of wastewater.</p>			
Source: Christopher A. Joseph & Associates, July 2008.			

**Table VI.C-5  
Estimated Electricity Consumption – Alternative RU 800**

Land Use	Size (SF)	Demand (Kilowatt hours/unit/year) <sup>a</sup>	Total (kilowatt hours/year)
Existing Uses <sup>b</sup>	--		26,010,004
<b>Proposed Alternative RU 800</b>			
Residential	800 units	5,626.50 KW-Hr/unit	4,501,200
Racetrack/Grandstand	--	--	17,246,704 <sup>c</sup>
<b>Subtotal Alternative</b>			<b>21,747,904</b>
<b>Total Net Electricity Demand</b>			<b>-4,262,100</b>
<p><i>Notes:</i>                      du: dwelling unit                      sf: square feet  <sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise.  <sup>b</sup> Hollywood Park Land Company, June 8, 2007.  <sup>c</sup> Of the total for existing uses, it was determined the Casino would require 8,763,300 KW-HR per year. Therefore, it is estimated the racetrack/grandstand would require the remaining 17,246,704 KW-HR per year.</p>			
Source: Christopher A. Joseph & Associates, July 2008.			

Natural Gas

Under Alternative RU 800, an increase in approximately 800 new dwelling units would increase demands for natural gas resources. As shown in Table VI.C-6, Alternative RU 800 would generate a demand for 7,668,940 cubic feet of natural gas per month, or approximately 3,774,040 cf more than the existing conditions. In comparison to the Proposed Project, which would generate a demand for 19,909,975 cf of natural gas per month, this Alternative would result in a demand decrease of approximately 12,241,035 cubic feet of natural gas per month. Similar to the Proposed Project, it is expected that existing natural gas infrastructure would be sufficient to serve the needs of this Alternative. Therefore, impacts with respect to demands for natural gas would be less than significant.

**Table VI.C-6  
Estimated Natural Gas Consumption – Alternative RU 800**

Land Use	Unit/Quantity	Consumption Rate <sup>a</sup>	Total (cf/month)
Existing Uses <sup>b</sup>	--	--	3,894,900
<b>Alternative RU 800</b>			
Residential	800 units	6,665 cf/du/month	5,332,000
Racetrack/Grandstand	--	--	2,336,940 <sup>c</sup>
<i>Subtotal</i>			<b>7,668,940</b>
<b>Net Total Natural Gas</b>			<b>3,774,040</b>
<sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise. <sup>b</sup> Hollywood Park Land Company, June 8, 2007. <sup>c</sup> Per Hollywood Park Land Company, the racetrack/grandstand is estimated to use approximately 60% of the existing natural gas demand. Source: Christopher A. Joseph & Associates, July 2008.			

Solid Waste

Demolition activities under Alternative RU 800 would generate substantially less demolition debris than the Proposed Project as the Alternative would retain the existing racetrack and grandstand. Based on an average construction debris factor of 4.48 lbs per sf for the dwelling units (assuming an average of 1,500 square feet per dwelling unit), this Alternative would generate approximately 2,628 tons of building construction debris. And, for demolition of the casino, this Alternative would generate approximately 31,000 tons of debris. Therefore, in combination, this Alternative would generate a total of approximately 33,628 tons of total construction debris, or approximately 46,967 tons less than the construction and demolition debris generated by the Proposed Project. This reduction is primarily due to the retention of the existing racetrack. Accordingly, since less demolition debris would be generated, this Alternative, like the Proposed Project, would have a less than significant impact on construction-related solid waste..

As shown in Table VI.C-7 the net operational solid waste generation for Alternative RU 800 would be approximately 1,595 tons of solid waste per day. This Alternative would result in a reduction of operational solid waste generation by approximately 10,661 pounds per day as compared to the Proposed Project. Accordingly, solid waste disposal needs would be reduced under this Alternative. However, operational-related solid waste impacts would be significant and unavoidable as regional landfill capacity for the life of the Alternative beyond 2015 has not been accommodated. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) operational solid waste impacts would be significant and unavoidable on project-specific and cumulative level. Therefore, impacts on solid waste under this Alternative would be significant and unavoidable.

**Table VI.C-7  
Estimated Operational Solid Waste Generation - Alternative RU 800**

Land Use	Unit/Quantity	Generation Rate <sup>a</sup> (lbs/unit/day)	Total (Pounds/Day)
<b>Existing Uses</b>			
Main Building/Grandstand	594,000	.006	3,564
Casino <sup>b</sup>	321,000	.005	1,605
		<i>Subtotal</i>	<b>5,169</b>
<b>Alternative RU 800</b>			
Main Building/Grandstand	594,000	.006	3,564
Residential	800 units	4.00 lbs/unit/day	3,200
		<i>Subtotal</i>	<b>6,764</b>
		<b>Net Total</b>	<b>1,595</b>
<sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table. <sup>b</sup> Does not include the Pavilion area which has been abandoned and is not in use. Source: Christopher A. Joseph & Associates, July 2008.			

## Public Services

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

### *Police Protection*

The projected demand for police protection service is based on the size and type of land use and anticipated on-site population. Since this Alternative would result in the development of 800 more residences than currently exist, it would place an increased demand on the Inglewood Police Department for police protection services. Based on the number of sworn officers that are currently authorized for the IPD (i.e., 1.8 officers per 1,000 inhabitants), this Alternative would generate a demand for 4 additional police officers, or roughly 12 less police officers than the Proposed Project. Similar to the Proposed Project, Alternative RU 800 would generate tax revenue that the City could use to hire new

officers. Additionally, this Alternative would incorporate mitigation measures to reduce demands on police services, such as strategically positioned lighting and implementation of an on-site HOA-operated security plan. This Alternative would not include a police substation on the Project Site as no new commercial or retail land use would be developed to generate a need for one. Nevertheless, it is expected impacts on police protection services under this Alternative would be less than significant.

*Fire Protection*

The projected demand for fire protection services is based on the amount and size of new structures on a site. Since this Alternative would result in an increase of residential units and the continued operation of the racetrack use, the intensity of this development would be altered compared to existing conditions, but it would not place a substantially increased demand on the LACoFD for fire protection services. Fire flow requirements for this Alternative would be determined by the LACoFD. Overall, the impact on fire protection services under Alternative RU 800 would be considered less than significant.

*Schools*

As shown in Table VI.C-8, Alternative RU 800 would generate approximately 316 new students; approximately 258 fewer students than the Proposed Project. It should be noted that for the purposes of studying the maximum impacts to schools under this Alternative, the student generation rate for single-family detached homes was used. In contrast to the Proposed Project, this Alternative would not include the 4-acre site for civic uses. Accordingly, the potential for the Inglewood Unified School District to develop a school site within the Project Site would be precluded. As discussed in Section IV.K.3, the Project Applicant would be required to pay school fees to the Inglewood Unified School District in compliance with SB 50. The payment of this fee would fully mitigate any potential school impacts. Therefore, this Alternative would result in a less than significant impact after mitigation. However, this Alternative would preclude any funding through the payment of developer fees and the 4-acre site which could be utilized by the Inglewood Unified School District, subject to economic feasibility and determinations of the School District and the City of Inglewood to develop this public benefit area. Therefore, the Proposed Project could be more beneficial than Alternative RU 800 with respect to school services.

**Table VI.C-8  
Estimated Student Generation by Alternative RU 800**

Product Type	Student Projections			
	K-5	6-8	9-12	K-12
Single Family Detached	157	74	85	316
<b>TOTAL</b>	<b>157</b>	<b>74</b>	<b>85</b>	<b>316</b>

*Notes: Student generation rates based on Residential Development School Fee Justification Studies, Los Angeles Unified School District, February 2008. Alternative RU 800 would include the following unit breakdown: 180 Single Family Detached, 540 Single Family Attached, and 80 Multi-Family.*

### *Recreation and Parks*

Under the Proposed Project, the Project Applicant is proposing to provide 25 acres of open space that would be provided for community use. Due to the retention of the existing racetrack under this Alternative, Alternative RU 800 may include only enough common open space to satisfy the project's demand. Based on the standard target in the Open Space Element of one acre per 1,000 persons, this Alternative would generate a need for approximately 2.4 acres of open space. Unlike Alternative RU 800, the Proposed Project would provide substantial public benefit by increasing the amount of common open space that is available within the City. Although the Proposed Project would provide an amount of open space in excess of the Open Space Element goal and thus would be more beneficial than Alternative RU 800, impacts under the Alternative would still remain less than significant.

### *Libraries*

Alternative RU 800 would generate approximately 2,400 new residents to the City of Inglewood, generating an increased demand for library services. Based on written correspondence from the Inglewood Public Library, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels. Therefore, Alternative RU 800 would result in a less than significant impact to the Inglewood Library system. However, the Proposed Project could be more beneficial than Alternative RU 800 since the Proposed Project could potentially allocate the four-acre civic site to be used as a joint use school, including a library, which can be utilized by all City residents.

### **Traffic and Transportation**

Impacts on traffic and transportation under the Proposed Project would be less than significant after mitigation.

#### *Alternative RU 800 Weekday Trip Generation Summary*

The weekday trip generation forecast for Alternative RU 800 is summarized in Table VI.C-9. As presented in Table VI.C-9, Alternative RU 800 is expected to generate an additional 210 vehicle trips (70 fewer inbound trips and 280 more outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, Alternative RU 800 is expected to generate 340 fewer vehicle trips (48 more inbound trips and 388 fewer outbound trips). Over a 24-hour period, Alternative RU 800 is forecast to generate an additional 1,858 daily trip ends during a typical weekday (approximately 929 inbound trips and 929 outbound trips).

#### *Alternative RU 800 Weekend Trip Generation Summary*

The weekend trip generation forecast for Alternative RU 800 is summarized in Table VI.C-10. As presented in Table VI.C-10, Alternative RU 800 is expected to generate 358 fewer vehicle trips (233 fewer inbound trips and 125 fewer outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, Alternative RU 800 is forecast to generate an additional 2,026 daily trip ends during a typical weekend day (approximately 1,013 inbound trips and 1,013 outbound trips).

**Table VI.C-9  
Alternative RU 800 Weekday Trip Generation<sup>a</sup>**

Land Use	Size	Daily Trip Ends <sup>b</sup> Volumes	AM Peak Hour Volumes <sup>b</sup>			PM Peak Hour Volumes <sup>b</sup>		
			In	Out	Total	In	Out	Total
Residential <sup>c</sup>	800 DU	7,044	142	427	569	439	258	697
Existing Casino to be Removed <sup>d</sup>	120,000 sf	(5,186)	(212)	(147)	(359)	(391)	(646)	(1,037)
<b>Net Total Trip Generation</b>		<b>1,858</b>	<b>(70)</b>	<b>280</b>	<b>210</b>	<b>48</b>	<b>(388)</b>	<b>(340)</b>

*Notes:*  
<sup>a</sup> Source: ITE "trip Generation" 7<sup>th</sup> Edition, 2003.  
<sup>b</sup> Trips are one-way traffic movements, entering or leaving.  
<sup>c</sup> ITE Land Use Code 210 (Single-Family Detached Housing) trip generation equation rates.  
<sup>d</sup> Based on weekday traffic count data collected.  
 Source: Linscott Law and Greenspan Engineers, Revised Traffic Study August 1, 2008.

**Table VI.C-10  
Alternative RU 800 Weekend Trip Generation<sup>a</sup>**

Land Use	Size	Daily Trip Ends <sup>b</sup> Volumes	Mid Day Peak Hour Volumes <sup>b</sup>		
			In	Out	Total
Residential <sup>c</sup>	800 DU	7,432	390	333	723
Existing Casino to be Removed	120,000 <sup>d</sup>	(5,406)	(623)	(458)	(1,081)
<b>Net Total Trip Generation</b>		<b>2,026</b>	<b>(233)</b>	<b>(125)</b>	<b>(358)</b>

*Notes:*  
<sup>a</sup> Source: ITE "trip Generation" 7<sup>th</sup> Edition, 2003.  
<sup>b</sup> Trips are one-way traffic movements, entering or leaving.  
<sup>c</sup> ITE Land Use Code 210 (Single-Family Detached Housing) trip generation equation rates.  
<sup>d</sup> Based on weekend traffic count data collected.  
 Source: Linscott Law and Greenspan Engineers, Revised Traffic Study August 1, 2008.

**Traffic Impact Comparison**

*Weekday Conditions*

A qualitative review was conducted to determine if Alternative RU 800 would likely result in an increase in project impacts compared to the Proposed Project. During the weekday conditions, Alternative RU 800 is expected to generate 1,394 fewer vehicle trips than the Proposed Project during the AM peak hour. During the PM peak hour, Alternative RU 800 is expected to generate 301 fewer vehicle trips than the Proposed Project. Over a 24-hour period, Alternative RU 800 is forecast to generate 15,364 fewer daily trip ends during a typical weekday. Based on this comparison, it is determined that Alternative RU 800 would likely result in an overall decrease in traffic impacts compared to the Proposed Project.

### *Weekend Conditions*

A qualitative review was conducted to determine if Alternative RU 800 would likely result in an increase in project impacts when compared to the Proposed Project. During the weekend conditions, Alternative RU 800 is expected to generate 1,732 fewer vehicle trips than the Proposed Project during the mid-day peak hour and 23,482 fewer trips over a 24-hour typical weekend period. Based on this comparison, it is determined that Alternative RU 800 would likely result in an overall decrease in traffic impacts compared to the Proposed Project.

Overall, Alternative RU 800 would result in a less than significant impact to traffic and transportation with implementation of mitigation measures. However, given the level of proposed mitigation measures and the fact that Alternative RU 800 does not contain any retail, office/commercial or casino/gaming uses that could generate a source of revenue to fund implementation of the street and frontage improvements, it may be necessary to locate a source of funding to implement the level of improvements proposed by the Proposed Project's mitigation measures to achieve a less than significant impact to traffic and transportation under this Alternative.

### **Parking**

Impacts on parking from the Proposed Project would be less than significant. Alternative RU 800 would result in the continued parking supply required to meet the operating demands of the racetrack use. Additionally, based on the IMC, this Alternative would be required to supply 1,600 spaces for the residents. Alternative RU 800 would satisfy the parking requirements as stipulated by code for the residential uses. Therefore, impacts related to parking would be less than significant.

### **CONCLUSION**

Alternative RU 800 would not reduce the following significant and unavoidable impacts to levels of insignificance associated with the Proposed Project: Air Quality (Construction and Operation), Noise (Construction), Population, Housing & Employment (Population growth forecasts and Housing growth forecasts), and Solid Waste (Operations). In addition, Alternative RU 800 creates additional significant and unavoidable impacts to Population, Housing & Employment (Employment Displacement and Employment Generation) due to the significant loss of jobs on the Project Site, and to Land Use (Compatibility with existing area) due to the potential use conflicts caused by dust, vectors, odors, and racing related noises caused by placing 800 dwelling units directly adjacent to a horseracing facility.

As described in Table VI.C-11, below, Alternative RU 800 would fail to achieve 3 of the 13 Project Objectives. Objective 10 and 13 would be completely satisfied by this alternative. Objectives 1, 2, 4, 6, 8, 9, 11 and 12 would be met to some degree by Alternative RU 800, but not to the same degree as the Proposed Project. Objectives 3, 5, and 7 would not be met at all under this Alternative.

**Table VI.C-11  
Assessment of the Alternative RU 800 to Meet the Project Objectives**

<b>Project Objectives</b>	<b>Assessment of the Alternative to Meet Objectives</b>
1. To contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space.	Alternative RU 800 would not meet this objective as fully as the Proposed Project as it would only result in single family redevelopment on the Project Site and would not provide the mix of uses proposed by the Project.
2. To provide an economically viable project that promotes the City’s economic well-being by significantly increasing property and sales tax revenues and providing high-quality retail uses and the opportunity for transient occupancy tax.	Alternative RU 800 would involve the retention of the existing Hollywood Park Racetrack which contributes to the City’s sales tax and OTB revenue. However, RU 800 eliminates the Casino use from the Project Site. While Alternative RU 800 may prove economically viable for the near future, the racing industry may or may not support the continued operation of the Hollywood Park Racetrack in the long-term.
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.	This objective would not be met since the Casino is eliminated under Alternative RU 800.
4. To provide land for a civic/public use.	Alternative RU 800 would not meet this objective in the same manner as the project. The existing Hollywood Park Racetrack is however a regional recreational land use that is enjoyed by the public.
5. To create exciting community park and open space areas, that exceed the City’s existing General Plan goals of one acre per 1,000 residents, in a manner that meets the needs of the proposed development and is beneficial to the overall community.	Alternative RU 800 would not create any new community park and open space areas. Therefore this objective would not be met.
6. To add a variety of ownership-housing opportunities, of different product types and prices, in an area of the greater Los Angeles region that is job-rich, thus creating a better balance of housing and employment opportunities.	Alternative RU 800 would be partially consistent with this project objective, as it would provide single-family housing opportunities. It would not provide the same variety of product types as the Proposed Project.
7. To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood.	Alternative RU 800 would not add any office space opportunities. As such, this objective would not be met.
8. To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and public open space within portions of the Merged Redevelopment Project Area.	Alternative RU 800 would involve the construction of single-family residential units and retain the existing racetrack. While the existing use of the Site as a racetrack would remain operational for some period of time, the racing industry may or may not support the continued operation of the Hollywood Park Racetrack in the long-term. If the site becomes inoperable as a racetrack, it may lead to deterioration of the facilities. Further, Alternative RU 800 would not provide, retail and restaurant uses, or public open space within the Merged Redevelopment Project Areas. Therefore, this objective would not fully be met.
9. To create safe, secure and defensible spaces through project design, while also allowing public spaces, such as parks and retail, to be open to the public.	The Hollywood Park Racetrack is operated and maintained in a manner that creates a safe, secure and defensible environment for visitors and employees. Alternative RU 800 would not provide new public spaces, such as parks and retail, as such this objective would be satisfied, but to a lesser degree than the Proposed Project.
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project.	Alternative RU 800 would involve the construction of single family homes. As such the opportunity to provide sustainable building practices would be permitted.



Project Objectives	Assessment of the Alternative to Meet Objectives
11. To promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways in a mixed-use project which integrates housing with employment opportunities.	Alternative RU 800 could incorporate pedestrian connections and bicycle paths in a residential environment. However, the exclusion of the mixed-use component would to a large degree preclude walkability. As such this objective would not fully be met.
12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities.	Alternative RU 800 could incorporate streetscape amenities in a single family residential environment. However, the exclusion of the mixed-use component would to a large degree preclude the variety of amenities and streetscape character of the Proposed Project.
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.	The existing Hollywood Park Racetrack grounds are currently landscaped to enhance the visual appearance and appeal of the facility. Alternative RU 800 would integrate landscaping features into the common areas and along pedestrian corridors and paseos. Therefore, this alternative would be met.

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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

### D. ALTERNATIVE RU 1,000

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This Alternative was selected as a possible scenario for future development to allow for reduced development on the Project Site in an effort to reduce the Proposed Project's environmental impact while achieving some, but not all of the Project objectives. Rather than a large, mixed-use development, Alternative RU 1,000 would result in the development of approximately 1,000 single-family dwelling units, with the removal of the existing casino and racetrack. This Alternative would include approximately 25 acres of open space. The existing racetrack, grandstand and casino would be demolished to provide for the redevelopment of the site with the proposed residential land uses. A summary of the planned development under this Alternative is provided in Table VI.D-1, below.

**Table VI.D-1  
Development Summary of Alternative RU 1,000**

PROPOSED DEVELOPMENT	UNITS/ FLOOR AREA (NET) <sup>a</sup>
Residential	1,000 du
Retail	N/A
Casino	N/A
Civic	N/A
Hotel	N/A
Office	N/A
Open Space	25 Acres
Community Space	N/A
<b>Notes</b>	
<sup>a</sup> The use of net floor area is calculated per the Inglewood Municipal Code for purposes of determining the developed floor area. All floor area values are expressed in square feet (sf). Source: Hollywood Park Land Company, July 2008.	

### Aesthetics

#### *Views and Urban Design*

Impacts on views and urban design under the Proposed Project would be less than significant. Under Alternative RU 1,000, the Project Site would be redeveloped in a manner that is substantially similar to the residential uses of the Proposed Project in terms of views and urban design. This Alternative would involve the demolition of the existing casino, racetrack and grandstand, but would not include the development of the retail, office, civic or hotel components that are proposed under the Proposed Project. While the density and mix of land uses would differ from the Proposed Project, the urban design would be substantially similar and this Alternative would be designed to yield resulting views and urban design

characteristics that would be consistent with the Merged Redevelopment Plan, as Alternative RU 1,000 would provide several visual improvements as compared to the existing conditions of the Project Site. Impacts to views and urban design under this Alternative would be less than significant.

#### *Light and Glare*

Impacts on light and glare under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, Alternative RU 1,000 would generate new sources of light and glare in the form of street lighting and structural light illumination associated with the 1,000 new dwelling units. As compared to the existing environment, Alternative RU 1,000 would eliminate a substantial amount of light pollution that is currently generated by evening events at the racetrack and casino. Additionally, the new sources of light associated with the dwelling units would be designed to include directional and security lighting in a manner to reduce light and glare impacts on adjacent uses to the maximum extent feasible. For this reason, light and glare impacts would be less than significant under Alternative RU 1,000.

#### *Shade and Shadow*

The Proposed Project would result in a less than significant impact to shade/shadow. Alternative RU 1,000 would exclude the retail, civic, hotel and office development and would be solely developed with single family homes with all structures substantially below the 75 foot height of the buildings associated with the Proposed Project. Additionally, this Alternative would involve the removal of the casino and grandstand uses, which would substantially decrease shadow lengths cast from the Project Site. Accordingly, shade and shadow impacts from this Alternative would not significantly impact neighboring land uses. Therefore, shade and shadow impacts under Alternative RU 1,000 would be less than significant.

### **Air Quality**

#### *Construction*

The Proposed Project would result in significant and unavoidable construction-related impacts. Alternative RU 1,000 would require similar amounts of demolition activity as compared to the Proposed Project as this Alternative would demolish all uses on the Project Site. Additionally, a shorter construction duration would be assumed than for the Proposed Project since only 1,000 dwelling units (compared to 2,995 units and the other retail, office/commercial, hotel and civic uses under the Proposed Project) would be constructed on the Project Site. As such, pollutant emissions during the Alternative RU 1,000 construction period would be less than pollutants emitted during the construction period for the Proposed Project. However, assuming that Alternative RU 1,000 would require more than 13 acres to be graded per day, construction emissions would exceed the SCAQMD regional and localized significance thresholds for NO<sub>x</sub>, PM<sub>2.5</sub> and PM<sub>10</sub>. As such, Alternative RU 1,000 daily construction emissions would result in a significant and unavoidable air quality impact.

### *Operational*

Alternative RU 1,000 would generate fewer daily vehicle trips than currently exist on the Project Site. As such, this Alternative would result in less regional operational emissions than are currently generated on the Project Site and less emissions than generated by the Proposed Project. The reduction in development would eliminate the VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub> regional operational impact associated with the Proposed Project. As such, Alternative RU 1,000 daily operational emissions would result in a less than significant regional operational air quality impact.

Alternative RU 1,000 would result in less daily vehicle trips than the Proposed Project and, as such, would result in less localized CO concentrations. Therefore, similar to the Proposed Project, Alternative RU 1,000 would result in a less than significant localized CO impact.

Similar to the Proposed Project, Alternative RU 1,000 technically would not be consistent with the land use designation and population growth forecasts utilized to calculate the emissions budget in the most recent AQMP. As such, Alternative RU 1,000 would not be compatible with the AQMP and would result in a significant and unavoidable air quality impact due to this technical inconsistency.

Due to the reduced size, density, and type of development, Alternative RU 1,000 would generate less GHG emissions than the Proposed Project. Similar to the Proposed Project, Alternative RU 1,000 would result in a less than significant global warming impact.

Overall, Alternative RU 1,000 emissions would be less than the Proposed Project's emissions; however, since Alternative RU 1,000 would be inconsistent with the AQMP for the same reasons as the Proposed Project, the Alternative would also technically result in a significant and unavoidable operational air quality impact.

### **Geology and Soils**

Impacts on geology and soils under the Proposed Project would be less than significant after mitigation. The same geological conditions and associated seismic risks would occur under Alternative RU 1,000 as described for the Proposed Project. Development of the Proposed Project has been determined to be generally feasible from a geotechnical perspective. The geotechnical recommendations associated with site preparation, earthwork and foundations and Restricted Use Zone (RUZ) that are identified in the EIR for the Proposed Project would carry over to this Alternative with minor modifications. Therefore, the geology and soils impacts under Alternative RU 1,000 would be less than significant.

### **Hazardous Materials and Risk of Upset**

#### *Construction*

Construction-related impacts on hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, Alternative RU 1,000 would generate potentially significant impacts associated with potential exposure to ACMs and LBP during

construction. However, these impacts would be mitigated to less than significant levels with adherence to all applicable laws and regulations and implementation of the mitigation measures prescribed for the Proposed Project. Therefore, Alternative RU 1,000 would have a less than significant impact with respect to hazardous materials during construction.

#### *Operation*

Operational impacts with respect to hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Under Alternative RU 1,000, the proposed residential uses would not generate a substantial amount of potentially hazardous materials and there are no commercial, office, civic, retail or casino/gaming uses. Therefore, this Alternative would have a less than significant impact with respect to hazardous materials during operation.

### **Cultural Resources**

#### *Archeological Resources*

A cultural resources records search was conducted for the Hollywood Park Redevelopment Project Property by the South Central Coastal Information Center, California Historical Resources Information System in July 2007. Based on a review of all recorded archaeological sites within a ½-mile radius of the Project Site and cultural resource reports on file, database records for all California Points of Historical Interest, California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places, and the California Historical Resources Inventory listings, no significant cultural resources are known to be located on the Project Site. Therefore, neither the Project nor Alternative RU 1,000 would result in any impacts to known cultural resources. Nevertheless, mitigation measures are proposed to reduce the impacts to less than significant levels for unknown cultural resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.

#### *Historic Resources*

The Proposed Project would not result in any impact upon a significant historic resource. Alternative RU 1,000 would involve the demolition of all existing buildings on the Project Site and the construction of single-family homes. Through a comprehensive cultural resource analysis (refer to Section IV.E Cultural Resources), which included a field investigation of the Project Site and surrounding area, review of building permit records, maps, books and photographs, it was determined, by an evaluation of criteria used by the California Register of Historical Resources and the National Register of Historic Places, that none of the existing buildings located on the Project Site are considered significant historic resources pursuant to CEQA. As such, Alternative RU 1,000 would result in a less than significant impact to historical resources.

## Hydrology/Water Quality

### *Construction*

Construction-related impacts on water quality under the Proposed Project would be less than significant after mitigation. Under Alternative RU 1,000, water quality impacts during construction would be substantially similar to the Proposed Project. The redevelopment of the site with new residential uses would include implementation of best management practices and compliance with the RWQCB regulations to ensure impacts are reduced to less-than-significant levels. Water quality impacts under this Alternative would therefore be less than significant.

### *Operational*

Operational impacts on water quality under the Proposed Project would be less than significant after mitigation. Under the Alternative RU 1,000, the amount of pervious surface area would be increased as compared to the Proposed Project, as this alternative would include the 25 acres of open space, the removal of the casino and related parking lots, reduced overall sizes of structural footprints, and larger lots to accommodate single family homes. Thus, a greater volume of surface water would be able to be retained on site thus generating less surface water runoff into the storm drains. Similar to the Proposed Project, this scenario would be able to retain and control storm water flows in a manner that would ensure a less-than-significant impact upon the existing storm water infrastructure. Therefore, water quality impacts under this Alternative would be less than significant after mitigation.

## Noise

### *Construction*

Impacts on noise due to construction activities under the Proposed Project would be significant and unavoidable after mitigation. Construction activity associated with Alternative RU 1,000 would generally result in similar noise levels as discussed for the Proposed Project. Therefore, it is anticipated that even with the implementation of comparable mitigation measures prescribed for the Proposed Project, mitigated construction noise levels for this Alternative would also likely exceed the five dBA significance threshold at the sensitive receptors near the Project Site. Construction-related noise exposure would however be shorter in duration given the smaller project size for this Alternative and construction activity associated with the alternative would comply with the standards established in the Noise Ordinance. Nevertheless, construction noise impacts associated with Alternative RU 1,000 would be considered significant and unavoidable after mitigation.

### *Operational*

Alternative RU 1,000 would result in less daily vehicle trips than the Proposed Project and as such, would result in lower mobile noise levels. Mobile noise is not anticipated to increase by more than three dBA CNEL and, as such, would result in a less than significant impact. Alternative RU 1,000 would include stationary noise sources comparable to those discussed for the Proposed Project. Alternative RU 1,000

also eliminates the noise generated by the casino/gaming facility. Similar to the Proposed Project, Alternative RU 1,000 would result in a less than significant stationary source operational noise impact.

Overall, Alternative RU 1,000 would result in similar construction-related noise levels, less stationary source operational noise, and less mobile source noise compared to the Proposed Project. Therefore, operational noise impacts under this Alternative would be less than significant.

### **Population, Housing and Employment**

Impacts on population, housing and employment under the Proposed Project would be significant and unavoidable due to a technical inconsistency with regional population and housing growth forecasts.

#### *Construction Impacts*

The Proposed Project would generate approximately 17,105 construction-related jobs over the 10-year buildout and stabilization horizon period. It is estimated that employment opportunities associated with construction of Alternative RU 1,000 would be substantially less than the Proposed Project as this Alternative would not include any of the otherwise proposed commercial, hotel, retail, civic and casino/gaming uses. Like the Proposed Project, these temporary construction-related jobs will not indirectly create an increase in the City's population or the need for housing. Also, although the Proposed Project would provide more construction jobs and result in a more beneficial construction employment scenario, this Alternative would still provide some temporary construction jobs and impacts would be considered less than significant.

#### *Operation Impacts*

##### *Employment Displacement Impacts*

Similar to the Proposed Project, Alternative RU 1,000 would displace the existing horseracing activities at the Hollywood Park Racetrack. However, due to economic conditions within the horseracing industry, this impact is considered less than significant as it is speculative to predict how long horseracing will be able to continue to operate on-site in the absence of any changes in state law regarding gaming. Impacts to the displacement of horseracing-related jobs at Hollywood Park would be the same as described for the Proposed Project, resulting in a loss of 1,601 FTE horseracing association jobs. In contrast to the Proposed Project, this Alternative would also result in the loss of the 1,017 jobs associated with the existing casino. The number of jobs generated by RU 1,000 is not sufficient to compensate for the number of jobs displaced by this Alternative. This Alternative creates a new significant and unavoidable employment displacement impact that is not created by the Proposed Project.

### *Employment Generation Impacts*

#### Indirect Employment Growth

The increase in population or the need for housing generated by the new on-site employment generated by the new residential uses on-site under RU 1,000 would be negligible. Indirect impacts to population, housing and employment demographics generated by the increased residential land uses of this Alternative would be less than significant.

#### Direct Employment Growth

Alternative RU 1,000 would demolish all existing uses on the Project Site and would include the new development of 1,000 single-family dwelling units. This Alternative would thus result in approximately 130 new jobs associated with operational services and maintenance for the residential uses (i.e., security, landscape, HOA management, etc), but would result in the loss of the existing 2,618 jobs associated with the current operations on the Project Site. Compared to the Proposed Project, which would generate approximately 517 net new jobs, Alternative RU 1,000 results in a permanent net loss of 2,488 jobs. Therefore, this Alternative would result in substantial decrease in jobs as compared to the existing conditions and this impact would be considered significant and unavoidable since it is inconsistent with the net positive job growth forecasts for the City.

### *Population/Housing Impacts*

Alternative RU 1,000 would involve the construction of 1,000 new dwelling units resulting in the generation of 3,000 new residents to the City of Inglewood. As compared to the Proposed Project, which would create approximately 2,995 new residential dwelling units, resulting in approximately 8,985 new permanent residents, this Alternative would decrease the amount of new housing and population growth within the City of Inglewood.

#### Regional Housing Growth Forecasts

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 this Alternative would add 1,000 units to the City of Inglewood. 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. Alternative RU 1,000 will add an additional 1,000 dwelling units to the City's housing inventory, resulting in a total of 39,969 dwelling units by 2014. This increase would be inconsistent with the 2008 RTP, as this Alternative would exceed the City's 2015 growth projection by 1,820 dwelling units. However, it should be noted that the 2008 RTP did not anticipate 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. Nevertheless, this Alternative would



technically exceed the housing projections of SCAG, and this impact, like the Proposed Project, would be considered significant and unavoidable.

### Regional Population Growth Forecasts

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. Alternative RU 1,000 would add approximately 3,000 persons to the City of Inglewood, which would increase the total population to 121,878 persons by 2014. This Alternative's population increase would not be consistent with the regional growth projections for the City as the population growth would exceed the total anticipated growth for 2015 by 1,693 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. This Alternative would redevelop an existing non-residential use and would require an adoption of a Specific Plan and amendment to the City's General Plan and the Merged Redevelopment Plan for the property. As this Alternative was not anticipated at the time SCAG prepared their 2008 RTP, the anticipated population and housing growth associated with the Alternative was not included within the 2008 RTP update. Nevertheless, the population growth anticipated by this Alternative technically would not be consistent with the projections of SCAG, and would result in a significant and unavoidable impact.

Notwithstanding the technically significant and unavoidable impact, like the Proposed Project, this Alternative 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. Additionally, the Alternative's creation of 1,000 newly-constructed dwelling units presents an opportunity for the City to continue its efforts to add high-quality, new housing to its housing stock. Overall, the Alternative 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.

### **Land Use and Planning**

Impacts on land use and planning under the Proposed Project would be less than significant after mitigation. Alternative RU 1,000 would demolish all existing uses on the Project Site and would include a single family residential development. As such, Alternative RU 1,000 would not be consistent with the existing Commercial-Recreation designations of the current Zoning district, General Plan designations, and the Merged Redevelopment Plan Land Use designations. Similar to the Proposed Project, this Alternative would include requests for a zone change, amendments to the General Plan and the Merged Redevelopment Plan and adoption of a Specific Plan. With approval of these requests, impacts from consistency with land use plans would be less than significant. Additionally, as a development of single family residences, Alternative RU 1,000 would be compatible with the surrounding area, which is

comprised of a mix of low-to medium-density residential, commercial, motel, and office uses. As such, impacts from compatibility with the existing community would be less than significant.

### Public Utilities

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

### Water

As shown in Table VI.D-2, below, Alternative RU 1,000 would generate a net increase in water demand by approximately 17 acre-feet of water per year over existing conditions.

**Table VI.D-2**  
**Estimated Water (Potable) Consumption by Alternative RU 1,000**

Land Use	Unit/Quantity	Water Use (gal/day/unit) <sup>a</sup>	Total (gpd)	Total (AF/year)
<i>Existing</i>				
Existing Uses <sup>a</sup>	--	--	321,139	360
<i>Subtotal Existing:</i>				
<i>Alternative RU 1,000</i>				
Residential	1,000 du	336gpd/du	336,000	377
<i>Subtotal Alternative</i>	-	-	<b>336,000</b>	<b>377</b>
<b>Total Net Water Demand</b>			<b>14,861</b>	<b>17</b>
<i>Notes:</i>				
<i>du: Dwelling units</i>				
<i>AFY: Acre feet per year.</i>				
<sup>a</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008. The 1,000 du assumed to be SFD (R-1) as provided in the Water Supply Assessment for Hollywood Park.				
Source: Christopher A. Joseph & Associates, July 2008.				

As discussed in Section IV.J.1. Water, the 2005 Urban Water Management Plan accounted for some level of redevelopment on the Hollywood Park project site (in addition to the Renaissance and Haagan projects). Based on the formula presented in that Section, the 93.33 AF/yr is the total projected water demand for the three developments included in the 2005 UWMP based upon available water usage data of the Renaissance and Haagan projects and the projected water demand for Alternative RU 1,000. 360.60 AF/yr was attributed to the three developments in the 2005 UWMP, leaving a surplus of 267.27 AF/yr. Therefore, all of the water demanded by Alternative RU 1,000 has already been accounted for in the 2005 UWMP. Ordinance No. 170,978 would still apply to Alternative RU 1,000, resulting in increased water conservation measures although no mitigation measures are proposed. Impacts associated with water availability under Alternative RU 1,000 would be less than significant.

*Wastewater*

As shown in Table VI.D-3 below, Alternative RU 1,000 would generate approximately 200,000 gpd of wastewater per day, which would be a reduction of 324,000 gpd as compared to existing conditions. In comparison to the Proposed Project, which is anticipated to generate approximately 393,000 net gpd of wastewater, this Alternative would represent a 717,000 gpd decrease in wastewater generation. It is expected that the existing wastewater infrastructure would be sufficient to handle the wastewater generation since this Alternative generates a net decrease as compared to the existing uses on the site. Impacts to sewer infrastructure and wastewater treatment facilities would thus be less than significant under this Alternative.

**Table VI.D-3  
Estimated Wastewater Generation by Alternative RU 1,000**

Land Use	Unit/Quantity	Generation Rate (gpd/unit) <sup>a</sup>	Total (gallons/day)
<b>Existing</b>			
Existing Uses <sup>b</sup>	--	--	524,000
<b>Subtotal Existing:</b>			
<b>Alternative RU 1,000</b>			
Residential	1,000 du	200gal/unit/day	200,000
Open Space	25 AC	--	--
<b>Subtotal</b>			<b>200,000</b>
<b>Net Wastewater Generation</b>			<b>-324,000</b>
<i>Notes:</i>			
<i>du: Dwelling units</i>			
<i>sf: Square feet</i>			
<sup>a</sup> Generation Rates based on County Sanitation Districts of Los Angeles County wastewater generation rates.			
<sup>b</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.			
Source: Christopher A. Joseph & Associates, July 2008.			

*Energy*Electricity

As shown in Table VI.D-4, Alternative RU 1,000 would generate an electricity demand for approximately 6,715,500 kilowatt hours per year (KW-Hr/yr). In comparison to the existing uses, this Alternative would reduce electricity demand by approximately 19,294,504 KW-Hr/yr. Compared to the Proposed Project, this Alternative would result in an electricity use reduction of approximately 26,131,348 KW-Hr/yr per year. It is anticipated that the existing electrical facilities can support this Alternative since it generates a net decrease in demand as compared to the existing uses on the site. Therefore, the energy demands for this Alternative would be less than significant.

**Table VI.D-4  
Estimated Electricity Consumption – Alternative RU 1,000**

Land Use	Size (SF)	Demand (Kilowatt hours/unit/year) <sup>a</sup>	Total (kilowatt hours/year)
Existing Uses <sup>b</sup>	--		26,010,004
<i>Subtotal Existing</i>	-	-	
<b>Alternative RU 1,000</b>			
Residential	1,000 units	5,626.50 KW-Hr/unit	5,626,500
Open Space	25 AC	1 KW-Hr/sf/yr	1,089,000
<i>Subtotal Alternative</i>			<b>6,715,500</b>
<b>Net Electricity Demand</b>			<b>-19,294,504</b>
<i>Notes:</i>			
<i>du: dwelling unit</i>			
<i><sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise.</i>			
<i><sup>b</sup> Hollywood Park Land Company, June 8, 2007.</i>			
<i>Source: Christopher A. Joseph &amp; Associates, July 2008.</i>			

Natural Gas

As shown in Table VI.D-5, Alternative RU 1,000 would generate a demand for a net increase in 2,770,100 cubic feet of natural gas per month. In comparison to the Proposed Project, this Alternative would result in a decrease in demand by approximately 17,139,875 cubic feet of natural gas per month. As is the case under the Proposed Project, existing natural gas infrastructure would be sufficient to serve the needs of this Alternative. Impacts would be considered less than significant under this Alternative.

**Table VI.D-5  
Estimated Natural Gas Consumption – Alternative RU 1,000**

Land Use	Unit/Quantity	Consumption Rate <sup>a</sup>	Total (cf/month)
Existing Uses <sup>b</sup>	--	--	3,894,900
<b>Alternative RU 1,000</b>			
Residential	1,000 units	6,665 cf/du/month	6,665,000
Open Space	25 AC	--	--
<i>Subtotal</i>			<b>6,665,000</b>
<b>Net Natural Gas Demand</b>			<b>2,770,100</b>
<i><sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise.</i>			
<i><sup>b</sup> Hollywood Park Land Company, June 8, 2007.</i>			
<i>Source: Christopher A. Joseph &amp; Associates, July 2008.</i>			

*Solid Waste*

Demolition activities under Alternative RU 1,000 would involve demolition of all existing uses on the Project Site, which would be a slight increase as compared to the Proposed Project, which proposes to demolish all existing structures and improvements except for the casino. As shown in Table VI.D-6, this Alternative would generate approximately 77,035 tons of demolition debris. The amount of construction waste generated under Alternative RU 1,000 would be approximately 3,285 tons, resulting in a total of 80,320 tons of construction and demolition debris. As compared to the Proposed Project, this Alternative would result in an increase in solid waste generation by approximately 275 tons. Although demands for solid waste disposal needs would be increased compared to the Proposed Project, it is anticipated that adequate landfill capacity would be available to accommodate this Alternative's construction solid waste generation, and impacts to regional landfill capacity would be considered less than significant. This impact would be increased as compared to the Proposed Project.

**Table VI.D-6  
Construction Solid Waste Generation – Alternative RU 1,000**

Activity	Size	Rate (lbs./sf)	Generated Waste (tons)
<b>Demolition-Existing Uses</b>			
Casino/Pavilion	400,000	155	31,000
Main	594,000	155	46,035
<i>Subtotal</i>			<b>77,035</b>
<b>Construction-Alternative RU 1,000</b>			
Residential <sup>a</sup>	1,000 units	4.38	3,285
Open Space	25 acres	N/A	-
<i>Subtotal</i>			<b>3,285</b>
<b>Total</b>			<b>80,320</b>
<sup>a</sup> Assumes an average of 1,500 sf per dwelling unit. Source: Christopher A. Joseph & Associates, July 2008.			

As shown in Table VI.D-7, below, net operational solid waste generation for Alternative RU 1,000 would be approximately 4,000 pounds of solid waste per day. This Alternative would result in a decreased generation of solid waste by approximately 1,169 pounds per day as compared to existing conditions, which would represent a decrease in approximately 13,425 ppd as compared to the Proposed Project. Nevertheless, operational-related solid waste impacts would be significant and unavoidable as regional landfill capacity for the life of the Alternative beyond 2015 has not been accommodated. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) operational solid waste impacts would be significant and unavoidable on project-specific and cumulative level. Therefore, impacts on solid waste under this Alternative would be significant and unavoidable.

**Table VI.D-7  
Estimated Operational Solid Waste Generation by Alternative RU 1,000**

Land Use	Unit/Quantity	Generation Rate <sup>a</sup> (lbs/unit/day)	Total (Pounds/Day)
<b>Existing Uses</b>			
Main Building/Grandstand	594,000	.006	3,564
Casino <sup>b</sup>	321,000	.005	1,605
		<i>Subtotal</i>	<b>5,169</b>
<b>Alternative RU 1,000</b>			
Residential	1,000 units	4.00 lbs/unit/day	4,000
Open Space	25 acres	--	--
		<i>Subtotal</i>	<b>4,000</b>
		<b>Net Total</b>	<b>1,169</b>
<sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table. <sup>b</sup> Hollywood Park Land Company, 2007. Source: Christopher A. Joseph & Associates, July 2008.			

## Public Services

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

### *Police Protection*

The projected demand for police protection services is based on the size and types of land uses and anticipated on-site population. Since this Alternative would result in the development of 1,000 more residences than currently exist, it would place an increased demand on the Inglewood Police Department for police protection services. Based on the number of sworn officers that are currently authorized for the IPD (i.e., 1.8 officers per 1,000 inhabitants), this Alternative would generate a demand for 5 additional police officers, or roughly 11 less police officers than the Proposed Project. Similar to the Proposed Project, Alternative RU 1,000 would generate tax revenue that the City could use to hire new officers. Additionally, this Alternative would incorporate mitigation measures to reduce the demands on police services in the area, such as strategically positioned lighting and implementation of an on-site HOA-operated security plan. This Alternative would not include a police substation on the Project Site as no new commercial land uses would be developed to generate a need for one. Therefore, the impact on police protection services under Alternative RU 1,000 would be less than significant.

### *Fire Protection*

The projected demand for fire protection services is based on the amount and size of new structures on a site. This Alternative would result in the creation of new residential units and an on-site population, and would include the removal of all existing uses on the Project Site. The types and amount of uses under

this Alternative would be different as compared to the existing conditions and the intensity of development under this Alternative would be less when compared to the Proposed Project. However, since this Alternative would result in the development of 1,000 more residences than currently exist, it would place an increased demand on the LACoFD for fire protection services. Fire flow requirements would be determined by the LACoFD. Overall, the impact on fire protection services under Alternative RU 1,000 would be considered less than significant. .

*Schools*

As shown in Table VI.D-8, Alternative RU 1,000 would generate approximately 395 new students; approximately 180 less than the Proposed Project. However, in contrast to the Proposed Project, this Alternative would not include the 4-acre site proposed for civic uses in the Proposed Project. Accordingly, the potential for the Inglewood Unified School District to develop a school site within the Proposed Project would be precluded. As discussed in Section IV.K.3, the Project Applicant would be required to pay school fees to the Inglewood Unified School District in compliance with SB 50. The payment of this fee would fully mitigate any potential school impacts. Therefore, like the Proposed Project, this Alternative would result in a less-than-significant impact with mitigation. However,, this Alternative would preclude any funding through the payment of developer fees and the 4-acre site which could be utilized by the Inglewood Unified School District, subject to economic feasibility and determinations of the School District and the City of Inglewood to develop this public benefit area. Therefore, the Proposed Project could be more beneficial than Alternative RU 1,000.

**Table VI.D-8  
Estimated Student Generation by Alternative RU 1,000**

Product Type	Student Projections			
	K-5	6-8	9-12	K-12
Single Family Detached	196	93	106	395
<i>Notes: Student generation rates based on Residential Development School Fee Justification Studies, Los Angeles Unified School District, February 2008. Alternative RU 1,000 would include all units as Single Family Detached.</i>				

*Recreation and Parks*

Under the Proposed Project, approximately 25 acres of open space would be provided. Alternative RU 1,000 would also provide 25 acres of open space. Based on the standard goal of one acre per 1,000 persons, this Alternative would generate a need for approximately 2.5 acres of open space. As such, this Alternative would exceed the City’s open space goals; therefore, impacts upon recreational demands would be less than significant. Similar to the Proposed Project, impacts this Alternative would provide substantial public benefit by increasing the amount of common open space that is available within the City. Therefore, impacts under this Alternative would be less than significant..

*Libraries*

Alternative RU 1,000 would generate approximately 3,000 new residents to the City of Inglewood, generating an increased demand for library services. Based on written correspondence from the Inglewood Public Library, the City’s libraries are currently meeting the needs of the City, within the limits of existing funding levels. Therefore, Alternative RU 1,000 would result in a less than significant impact to the Inglewood Library system. However, the Proposed Project could be more beneficial than Alternative RU 1,000 since the Proposed Project could potentially allocate the four-acre civic site to be used as a joint use school, including a library that can be utilized by all City residents.

**Traffic and Transportation**

Impacts on traffic and transportation under the Proposed Project would be less than significant with mitigation.

*Alternative RU 1,000 Weekday Trip Generation Summary*

The weekday trip generation forecast for Alternative RU 1,000 is summarized in Table VI.D-9. As presented in Table VI.D-9, Alternative RU 1,000 is expected to generate an additional 276 vehicle trips (95 fewer inbound trips and 371 more outbound trips) during the weekday AM peak hour compared to existing conditions.

**Table VI.D-9  
Alternative RU 1,000 Weekday Trip Generation <sup>a</sup>**

Land Use	Size	Daily Trip Ends <sup>b</sup> Volumes	AM Peak Hour Volumes <sup>b</sup>			PM Peak Hour Volumes <sup>b</sup>		
			In	Out	Total	In	Out	Total
Residential <sup>c</sup>	1,000 DU	8,648	177	532	709	536	315	851
Existing Uses to be Removed <sup>d</sup>	(10,000 attend.)	(19,936)	(272)	(161)	(433)	(660)	(3,327)	(3,987)
<b>Net Total Trip Generation</b>		<b>(11,288)</b>	<b>(95)</b>	<b>371</b>	<b>276</b>	<b>(124)</b>	<b>(3,012)</b>	<b>(3,136)</b>

*Notes:*  
<sup>a</sup> Source: ITE “trip Generation” 7<sup>th</sup> Edition, 2003.  
<sup>b</sup> Trips are one-way traffic movements, entering or leaving.  
<sup>c</sup> ITE Land Use Code 210 (Single-Family Detached Housing) trip generation equation rates.  
<sup>d</sup> Daily Trips were calculated based on the assumption that number of PM peak hour trips represents 20% of the daily traffic volumes.  
 Source: Linscott Law and Greenspan Engineers, Revised Traffic Study, August 1, 2008.

During the weekday PM peak hour, Alternative RU 1000 is expected to generate 3,136 fewer vehicle trips (124 fewer inbound trips and 3,012 fewer outbound trips). Over a 24-hour period, Alternative RU 1,000 is forecast to generate 11,288 fewer daily trip ends during a typical weekday (approximately 5,644 fewer inbound trips and 5,644 fewer outbound trips).



**Alternative RU 1,000 Weekend Trip Generation Summary**

The weekend trip generation forecast for Alternative RU 1,000 is summarized in Table VI.D-10. As presented in Table VI.D-10, Alternative RU 1,000 is expected to generate 1,896 fewer vehicle trips (1,665 fewer inbound trips and 231 fewer outbound trips) during the weekend mid-day peak hour compared to existing conditions. Over a 24-hour period, Alternative RU 1,000 is forecast to generate 4,820 fewer daily trip ends during a typical weekend day (approximately 2,410 fewer inbound trips and 2,410 fewer outbound trips).

**Table VI.D-10  
Alternative RU 1,000 Weekend Trip Generation <sup>a</sup>**

Land Use	Size	Daily Trip Ends <sup>b</sup> Volumes	Midday Peak Hour Volumes <sup>b</sup>		
			In	Out	Total
Residential <sup>c</sup>	1,000 DU	9,166	487	414	901
Existing Uses to be Removed <sup>d</sup>	(10,000 attend)	(13,986)	(2,152)	(645)	(2,797)
<b>Net Total Trip Generation</b>		<b>(4,820)</b>	<b>(1,665)</b>	<b>(231)</b>	<b>(1,896)</b>

*Notes:*  
<sup>a</sup> Source: ITE "trip Generation" 7<sup>th</sup> Edition, 2003.  
<sup>b</sup> Trips are one-way traffic movements, entering or leaving.  
<sup>c</sup> ITE Land Use Code 210 (Single-Family Detached Housing) trip generation equation rates.  
<sup>d</sup> Daily Trips were calculated based on the assumption that number of PM peak hour trips represents 20% of the daily traffic volumes.  
Source: Linscott Law and Greenspan Engineers, Revised Traffic Study August 1, 2008.

**Traffic Impact Comparison***Weekday Conditions*

A qualitative review was conducted to determine if Alternative RU 1,000 would likely result in an increase in project impacts when compared to the Proposed Project. During weekday conditions, Alternative RU 1,000 is expected to generate 1,328 fewer vehicle trips than the Proposed Project during the AM peak hour. During the PM peak hour, Alternative RU 1,000 is expected to generate 3,097 fewer vehicle trips than the Proposed Project. Over a 24-hour period, Alternative RU 1,000 is forecast to generate 28,510 fewer daily trip ends during a typical weekday. Based on this comparison, it is determined that Alternative RU 1,000 would likely result in an overall decrease in traffic impacts when compared to the Proposed Project.

*Weekend Conditions*

A qualitative review was conducted to determine if Alternative RU 1,000 would likely result in an increase in environmental impacts compared to the Proposed Project. During weekend conditions, Alternative RU 1,000 is expected to generate 3,270 fewer vehicle trips than the Proposed Project during the mid-day peak hour and 30,328 fewer trips over a 24-hour typical weekend period. Based on this

comparison, it is determined that Alternative RU 1,000 would likely result in an overall decrease in traffic impacts compared to the Proposed Project.

Overall, Alternative RU 1,000 would result in a less than significant impact to traffic and transportation with implementation of mitigation measures. However, given the level of proposed mitigation measures and the fact that Alternative RU 1,000 does not contain any retail, office/commercial or casino/gaming uses that could generate a source of revenue to fund implementation of the street and frontage improvements, it may be necessary to locate a source of funding to implement the level of improvements proposed by the mitigation measures to achieve a less than significant impact to traffic and transportation.

**Parking**

Impacts on parking from the Proposed Project would be less than significant. Alternative RU 1,000 would result in the demolition of all existing uses and parking spaces on the Project Site. Based on the IMC, this Alternative would be required to supply 2,000 parking spaces for the residents. Alternative RU 1,000 would satisfy the parking requirements as stipulated by code for the residential uses. Therefore, under Alternative RU 1,000, impacts related to parking would be less than significant, and essentially equivalent to the Proposed Project.

**CONCLUSION**

Alternative RU 1,000 would not reduce the following significant and unavoidable impacts to levels of insignificance associated with the Proposed Project: Air Quality (Construction and Operation), Noise (Construction), Population, Housing & Employment (Population growth forecasts and Housing growth forecasts), and Solid Waste (Operation). In addition, Alternative RU 1,000 creates an additional significant and unavoidable impact to Population, Housing & Employment (Employment Displacement) due to the significant loss of jobs on the Project Site. This impact is not an impact of the Proposed Project.

As described in Table VI.D-11, below, Alternative RU 1,000 would fail to achieve 4 of the 13 Project Objectives. Objective 5, 9, 10 and 13 would be completely satisfied by this alternative. Objectives 1, 6, 8, 11 and 12 would be met to some degree by Alternative RU 1,000, but not to the same degree as the Proposed Project. Objectives 2, 3, 4, and 7 would not be met at all under this Alternative.

**Table VI.D-11  
Assessment of Alternative RU 1,000 to Meet the Project Objectives**

Project Objectives	Assessment of the Alternative to Meet Objectives
1. To contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space.	Alternative RU 1,000 would not meet this objective as fully as the Proposed Project as it would only result in single family redevelopment and open space on the Project Site.
2. To provide an economically viable project that promotes the City’s economic well-being by significantly increasing property and sales tax	Alternative RU 1,000 has no retail, hotel or other sales generating uses and would thus not meet this objective.

Project Objectives	Assessment of the Alternative to Meet Objectives
revenues and providing high-quality retail uses and the opportunity for transient occupancy tax.	
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.	Alternative RU 1,000 would not be consistent with this project objective, as the Casino and Gambling facility would cease to operate.
4. To provide land for a civic/public use.	Alternative RU 1,000 would not meet this objective.
5. To create exciting community park and open space areas, that exceed the City's existing General Plan goals of one acre per 1,000 residents, in a manner that meets the needs of the proposed development and is beneficial to the overall community.	Alternative RU 1,000 would create 25 acres of new community park and open space areas, which is in excess of the General Plan's goal of one acre per 1,000 residents. Therefore this objective would be met.
6. To add a variety of ownership-housing opportunities, of different product types and prices, in an area of the greater Los Angeles region that is job-rich, thus creating a better balance of housing and employment opportunities.	Alternative RU 1,000 would be consistent with this project objective, as it would provide single-family housing opportunities. It would not provide the same variety of product types as the Proposed Project.
7. To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood.	Alternative RU 1,000 would not add any office space opportunities. As such, this objective would not be met.
8. To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and public open space within the Merged Redevelopment Project Area.	Alternative RU 1,000 would involve the construction of single-family residential units. However, Alternative RU 1,000 would not provide, retail and restaurant uses, or public open space within the Redevelopment Project Area. Therefore, this objective would not fully be met.
9. To create safe, secure and defensible spaces through project design, while also allowing public spaces, such as parks and retail, to be open to the public.	Although Alternative RU 1,000 does not contain retail space, it would meet this objective because the community would be designed to create defensible spaces while allowing park and open space areas to be open to the public.
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project.	Alternative RU 1,000 would involve the construction of single family homes. As such the opportunity to provide sustainable building practices would be permitted.
11. To promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways in a mixed-use project which integrates housing with employment opportunities.	Alternative RU 1,000 could incorporate pedestrian connections and bicycle paths in a residential environment. However, the exclusion of the mixed-use component would to a large degree preclude walkability. As such this objective would not fully be met.
12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities.	Alternative RU 1,000 could incorporate streetscape amenities in a single family residential environment. However, the exclusion of the mixed-use component would to a large degree preclude the variety of amenities and streetscape character of the Proposed Project.
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.	Alternative RU 1,000 would integrate landscaping features into the common areas and along pedestrian corridors and paseos. Therefore, this alternative would be met.

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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

### E. ALTERNATIVE RU 3,500

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This Alternative was selected as a possible scenario for future development to allow for increased residential development and more efficient use of the Project Site to further the objectives of the Merged Redevelopment Plan. Specifically, Alternative RU 3,500 would result in the development of approximately 3,500 dwelling units, approximately 620,000 sf of retail use, approximately 120,000 sf of casino use, a 300-room hotel with 20,000 sf of meeting room space, approximately 25,000 sf of office space, approximately 25 acres of open space, and approximately 10,000 sf of community space. A four-acre site would also be made available for civic uses which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility.

As compared to the Proposed Project, this Alternative would result in an increase of 505 dwelling units and a reduction of 50,000 sf of commercial office space. The Equivalency Program could not be utilized under this Alternative to maximize the number of dwelling units constructed on-site in excess of 3,500 units. The proposed circulation plan and landscaping features, including the lake would be similar to what is proposed under the Proposed Project. A summary of the planned development under this Alternative is provided in Table VI.E-1, below.

**Table VI.E-1  
Development Summary of Alternative RU 3,500**

PROPOSED DEVELOPMENT	FLOOR AREA (NET) <sup>[a]</sup>
Residential	3,500 du
Retail	620,000 sf
Casino	120,000 sf
Civic Use	4 Acres <sup>[b]</sup>
Hotel	300 rooms / 20,000 sf meeting space
Office	25,000 sf
Open Space	25 AC
Community Space (HOA Recreation Facility)	10,000 sf
<b>Notes</b>	
<sup>[a]</sup> The use of net floor area is calculated per the Inglewood Municipal Code for purposes of determining the developed floor area. All floor area values are expressed in square feet (sf).	
<sup>[b]</sup> For purposes of analyzing the most environmentally intensive development of a civic use, this use was assumed to include the development of a school use with up to 800 students for those impacts where a school would be the greatest and a library for all other impacts.	
Source: Hollywood Park Land Company, July 2008.	

## **Aesthetics**

### *Views and Urban Design*

Impacts on views and urban design under the Proposed Project would be less than significant. Under Alternative RU 3,500, the Project Site would be redeveloped in a manner that is substantially comparable to the Proposed Project in terms of visual character, views, and urban design. While the density of the project would be increased, the urban design and mix of land uses would be substantially the same, including the amount of open space provided and the landscaping features as described under the Proposed Project. Therefore, impacts to urban design and views would be less than significant.

### *Light and Glare*

Impacts on light and glare under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, Alternative RU 3,500 would generate new sources of light and glare in the form of street lighting, signage illumination and structural light illumination. Like the Proposed Project, buildings would be designed to include directional and security lighting in a manner to reduce light and glare impacts on adjacent uses to the maximum extent feasible. As compared to the existing environment, similar to the Proposed Project, Alternative RU 3,500 would eliminate a substantial amount of light pollution that is currently generated by evening events at the racetrack. Light and glare impacts under this Alternative would be less than significant.

### *Shade and Shadow*

The Proposed Project would result in a less-than-significant impact with respect to shade/shadow. Alternative RU 3,500 would be developed with most structures at or below 75 feet in height. The 300-room hotel structure would be the tallest structure at approximately 150 feet above grade level. As concluded for the Proposed Project, shade and shadow impacts from the development would not significantly impact neighboring land uses. Therefore, Alternative RU 3,500 would be developed at the same scale and massing as the Proposed Project, and this Alternative would also result in less than significant shade and shadow impacts. the Proposed Project.

## **Air Quality**

### *Construction*

Construction-related impacts on air quality under the Proposed Project would be significant and unavoidable. Alternative RU 3,500 would require more construction activity than the Proposed Project due to the additional 505 dwelling units. As such, pollutant emissions during the entire Alternative RU 3,500 construction period would be greater than pollutants emitted during the Proposed Project construction period. Accordingly, under Alternative RU 3,500, daily regional construction emissions of VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> would result in a significant and unavoidable air quality impact.

### *Operational*

Alternative RU 3,500 would generate more mobile and area source emissions than the proposed project. Weekday emissions would be approximately 333 pounds per day (ppd) for VOC, 228 ppd for NO<sub>x</sub>, 1,515 ppd for CO, two ppd for SO<sub>x</sub>, 61 ppd for PM<sub>2.5</sub>, and 312 ppd for PM<sub>10</sub>. Weekend emissions would be approximately 372 pounds per day (ppd) for VOC, 306 ppd for NO<sub>x</sub>, 2,143 ppd for CO, three ppd for SO<sub>x</sub>, 87 ppd for PM<sub>2.5</sub>, and 445 ppd for PM<sub>10</sub>. Similar to the proposed project, regional operational emissions would exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, Alternative RU 3,500 regional operational emissions would result in a significant and unavoidable impact.

Mobile source emissions associated with Alternative RU 3,500 would potentially increase localized CO emissions. Project-related one- and eight-hour CO concentrations were 3.2 and 2.2 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. Increased traffic associated with Alternative RU 3,500 would not substantially change the CO concentrations estimated for the proposed project, however they would be increased. As such, Alternative RU 3,500 would result in a less than significant localized CO impact.

Similar to the proposed project, Alternative RU 3500 would not be consistent with the land use designation or growth forecasts utilized to calculate the emissions budget in the most recent AQMP. As such, Alternative RU 3,500 would not be compatible with the AQMP and would result in a significant cumulative air quality impact. Alternative RU 3,500 would generate more GHG emissions than estimated for the proposed project. However, Alternative RU 3,500 would be typical of an urban environment, would not generate a disproportionate amount of vehicle miles of travel, and would not have unique and disproportionately high fuel consumption characteristics. Similar to the proposed project, Alternative RU 3,500 would result in a less than significant global warming impact.

Overall, Alternative RU 3,500 emissions would be greater than proposed project emissions but would result in similar air quality impact conclusions. In summary, Alternative RU 3,500 significant and unavoidable operational air quality impacts.

### **Geology and Soils**

Impacts on geology and soils under the Proposed Project would be less than significant after mitigation. The same geological conditions and associated seismic risks would occur under Alternative RU 3,500 as described for the Proposed Project. Development of the Proposed Project has been determined generally feasible from a geotechnical perspective. The geotechnical recommendations associated with site preparation, earthwork and foundations and Restricted Use Zone (RUZ) that are identified in the EIR for the Proposed Project would carry over to this Alternative with minor modifications. Therefore, the geology and soils impacts under Alternative RU 3,500 would be less than significant.

## **Hazardous Materials and Risk of Upset**

### *Construction*

Construction impacts on hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, this Alternative would result in the demolition of most of the existing uses and would generate potentially significant impacts associated with potential exposure to ACMs, and LBP during construction. Similar to the Project, however, these impacts would be mitigated to less-than-significant levels with adherence to all applicable laws and regulations and implementation of the mitigation measures prescribed for the Proposed Project. Therefore, Alternative RU 3,500 would have a less than significant impact with respect to hazardous materials during construction.

### *Operation*

Operational impacts with respect to hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Under Alternative RU 3,500, like the Proposed Project, the retail, office, casino, hotel, civic and residential uses would not require or generate substantial hazardous materials. Therefore, this Alternative would have a less than significant-impact-with-mitigation with respect to hazardous materials during operation.

## **Cultural Resources**

### *Archeological Resources*

A cultural resources records search was conducted for the Hollywood Park Redevelopment Project Property by the South Central Coastal Information Center, California Historical Resources Information System in July 2007. Based on a review of all recorded archaeological sites within a ½-mile radius of the Project Site and cultural resource reports on file, database records for all California Points of Historical Interest, California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places, and the California Historical Resources Inventory listings, no significant cultural resources are known to be located on the Project Site. Therefore, neither the Project nor Alternative RU 3,500 would result in any impacts to known cultural resources. Nevertheless, mitigation measures are proposed to reduce the impacts to less than significant levels for unknown cultural resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.

### *Historic Resources*

Impacts on historic resources under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, this Alternative would involve the demolition of all existing buildings on the Project Site and the construction of a new mixed-used development. Through a comprehensive historic resource analysis (refer to Section IV.E, Cultural Resources), which included a field investigation

of the Project Site and surrounding area, review of building permit records, maps, books and photographs, it was determined, by an evaluation of criteria used by the California Register of Historical Resources and the National Register of Historic Places, that none of the buildings currently existing on the Project Site are considered significant historic resources pursuant to CEQA. As such, Alternative RU 3,500 would not result in a significant impact to historic resources. Impacts upon historic resources would be less than significant.

## **Hydrology/Water Quality**

### *Construction*

Construction-related impacts on water quality under the Proposed Project would be less than significant after mitigation. Under the RU 3,500 Alternative water quality impacts would be slightly increased but similar to the Proposed Project. The redevelopment of the site at a higher density would generate more construction activities and vehicles with an increased potential to impair the surface water flows during storm events. Implementation of prescribed best management practices and compliance with the RWQCB regulations would reduce potentially significant water quality impacts to less than significant levels. Water quality impacts under the Alternative RU 3,500 would be less than significant after mitigation..

### *Operational*

Operational impacts to water quality under the Proposed Project would be less than significant after mitigation. Under Alternative RU 3,500, the amount of pervious surface area would be the same as this alternative would also include 25 acres of open space. Similar to the Proposed Project, both scenarios would include 25 acres of open space which would help the site retain and control storm water flows in a manner that would ensure a less- than- significant impact upon the existing storm water infrastructure. Additionally, implementation of prescribed best management practices and compliance with the RWQCB regulations would reduce potentially significant water quality impacts to less than significant levels. Water quality impacts under the Alternative RU 3,500 would be less than significant after mitigation.

## **Noise**

### *Construction*

Construction-related impacts on noise under the Proposed Project would be significant and unavoidable after mitigation. Construction activity associated with Alternative RU 3,500 would generally result in similar noise levels as discussed for the Proposed Project. Construction-related noise exposure would be expected to be longer in duration due to increased development as compared to the Proposed Project. Therefore, it is anticipated that even with the implementation of comparable mitigation measures prescribed for the Proposed Project, mitigated construction noise levels for this Alternative would also likely exceed the five dBA significance threshold at the sensitive receptors near the Project Site.



Construction-related noise exposure would also be longer in duration given the larger project size for this Alternative. Construction activity would however comply with the standards established in the Noise Ordinance. Nevertheless, like the Proposed Project, construction noise impacts associated with Alternative RU 3,500 would be considered significant and unavoidable after mitigation.

#### *Operation*

Operational impacts on noise under the Proposed Project would be less than significant after mitigation. Alternative RU 3,500 would result in more daily vehicle trips than the proposed project and, accordingly, would result in higher mobile noise levels. Mobile noise associated with Alternative RU 3,500 may result in noise level increases greater than three decibels within the “normally unacceptable” or “clearly unacceptable” category (see Table IV.G-6), resulting in a significant and unavoidable impact. However, stationary noise sources associated with Alternative RU 3,500 would be similar to those sources identified for the proposed project. As such, stationary noise under Alternative RU 3,500 would result in a less than significant impact.

Overall, noise associated with Alternative RU 3,500 would be similar to noise levels estimated for the Proposed Project, except for mobile noise, which would be increased under Alternative RU 3,500 and would result in a significant and unavoidable impact.

#### **Population, Housing, and Employment**

Impacts on population, housing and employment under the Proposed Project would be significant and unavoidable due to a technical inconsistency with regional population and housing growth forecasts.

#### *Construction Impacts*

The Proposed Project would generate approximately 17,105 construction-related jobs over the 10-year buildout and stabilization horizon period. It is estimated that employment opportunities associated with construction of Alternative RU 3,500 would be 18,821 construction-related jobs for the same time frame. Like the Proposed Project, these temporary construction-related jobs will not indirectly create an increase in the City’s population or the need for housing. Also, since this Alternative would likely result in slightly more construction jobs due to the increased density of development, impacts would be considered less than significant, although slightly more beneficial than the Proposed Project. Indirect impacts upon regional population, housing and employment conditions would be less than significant under this Alternative.

#### *Operational Employment Displacement Impacts*

Similar to the Proposed Project, Alternative RU 3,500 would eliminate horse racing at the Hollywood Park Racetrack, while maintaining the casino. Therefore, operational employment displacement impacts for this Alternative would be less than significant like the impacts of the Proposed Project.

### ***Employment Generation Impacts***

#### *Indirect Employment Growth*

This Alternative includes the same amount of retail and hotel space, but includes a reduction of 50,000 sf of office space and 505 additional residential units. However, employment opportunities typically associated with commercial, residential, hotel and retail uses would not likely result in substantial permanent population growth or associated housing demands. Indirect impacts to population and housing demographics generated by the residential, retail, hotel and commercial uses of this Alternative would be less than significant.

#### *Direct Employment Growth*

Under Alternative RU 3,500, the proposed retail, hotel, commercial and residential land uses are estimated to generate approximately 3,026 jobs, including the retention/relocation of approximately 1,071 existing casino-related jobs. When compared to the displacement of the 1,601 FTE jobs that are currently generated by the current horseracing operations on the property, this Alternative would result in a net increase of 408 jobs. As compared to the Proposed Project, which would generate approximately 517 net new jobs, the level of employment generated by this Alternative would be less. Nevertheless, as this Alternative would still generate a net positive amount of jobs, employment impacts would be considered less than significant.

### ***Population/Housing Impacts***

Alternative RU 3,500 would involve the construction of 3,500 new dwelling units resulting in the generation of 10,500 new residents to the City of Inglewood. As compared to the Proposed Project, which would create approximately 2,995 new residential dwelling units, resulting in approximately 8,985 new permanent residents, this Alternative would increase housing and population growth in the City.

#### *Regional Housing Growth Forecasts*

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 this Alternative would add 3,500 units to the City of Inglewood. 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. Alternative RU 3,500 will add an additional 3,500 dwelling units to the City's housing inventory, resulting in a total of 42,469 dwelling units by 2014. This increase would be inconsistent with the 2008 RTP, as this Alternative would exceed the City's 2015 growth projection by 4,320 dwelling units. However, it should be noted that the 2008 RTP did not anticipate 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. Nevertheless, this Alternative would

exceed the housing projections of SCAG, and this impact would be considered significant and unavoidable due to this technical inconsistency with the growth forecasts.

#### *Regional Population Growth Forecasts*

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. Alternative RU 3,500 would add approximately 10,500 persons to the City of Inglewood, which would increase the total population to 129,378 persons by 2014. This Alternative's population increase would not be consistent with the regional growth projections as the population growth would exceed the total anticipated growth for 2015 by 9,193 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. This Alternative would redevelop an existing non-residential use and would require an adoption of a Specific Plan and amendment to the City's General Plan and the Merged Redevelopment Plan for the property. As this Alternative was not anticipated at the time SCAG prepared their 2008 RTP, the anticipated population and housing growth associated with the Alternative was not included within the 2008 RTP update. Nevertheless, like the Proposed Project, the population growth anticipated by this Alternative technically would not be consistent with the projections of SCAG, and would result in a significant and unavoidable impact.

Notwithstanding the significant and unavoidable impacts created by Alternative RU 3500 due to the technical inconsistency with the regional population and housing growth forecasts, like the Proposed Project, this Alternative 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. Creating 3,500 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, the creation of new dwelling units helps to meet the regional housing needs allocated to Inglewood under the current RHNA. 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.

With respect to regional housing needs, the jobs-housing ratio for the entire South Bay region is projected to increase. As discussed in Section IV.H. Population, Housing and Employment, 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 - June 30, 2014 planning period. The creation of additional housing by this Alternative 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 this Alternative, like 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.

### **Land Use and Planning**

Alternative RU 3,500 would include generally the same mix of land uses as proposed under the Proposed Project. As such, Alternative RU 3,500 would not be consistent with the existing Commercial – Recreation designations of the current Zoning district, General Plan designations, and the Merged Redevelopment Plan Land Use designations. Similar to the Proposed Project, this Alternative would include requests for a zone change, a General Plan Amendment, amendment of the Merged Redevelopment Plan, and adoption of a Specific Plan. With approval of these requests, impacts from consistency with land use plans would be less than significant. Also, as a mixed-use community like the Proposed Project, Alternative RU 3,500 would be compatible with the surrounding area, which is comprised of a mix of low-to medium-density residential, commercial, motel, and office uses. As such, impacts from compatibility with the existing community would be less than significant.

### **Public Utilities**

With the exception of operational solid waste, impacts on public utilities under the Proposed Project would be considered less than significant.

### *Water*

As shown in Table VI.E-2, below, Alternative RU 3,500 would generate a demand for 712,692 gallons per day or approximately 798.32 AF/yr. Comparing the water demand estimated in the 2005 Urban Water Management Plan to the proposed water demands for RU 3,000 Alternative for the Hollywood Park Redevelopment Project yields the amount of water not accounted for in the 2005 Urban Water Management Plan for the Hollywood Park Redevelopment Project. Mathematically, this is shown as  $29.53 \text{ AF/yr [H]} + 46.76 \text{ AF/yr [R]} - 359.96 \text{ AF/yr [EHP]} + 798.32 \text{ AF/yr [HPRP]} = 514.65 \text{ AF/yr}$ .

**Table VI.E-2  
Water Demands under the Proposed Land Use Equivalency Scenario**

Project Land Use	Quantity	Unit	Demand Factor		Total (GPD)
<b>DOMESTIC WATER</b>					
Mixed Use (R-M)	4.45	AC	5,210	GPD/AC <sup>1</sup>	23,185
Residential SFD (R-1)	35	DU	336	GPD/DU <sup>1</sup>	11,760
Residential SFD (R-1.5, R-2, R-2A)	16.35	AC	1,926	GPD/AC <sup>1</sup>	31,490
Residential TH (R-3)	71.36	AC	5,210	GPD/AC <sup>1</sup>	371,786
Residential WRAP/PODUIM (R-4, R-M)	35.07	AC	5,210	GPD/AC <sup>1</sup>	182,715
<b>Subtotal Residential =</b>					<b>620,935</b>
Commercial/Retail	36.36	AC	1,680	GPD/AC <sup>1</sup>	61,085
Hotel	4.95	AC	1,680	GPD/AC <sup>1</sup>	8,316
Casino/OTB	5.64	AC	1,680	GPD/AC <sup>1</sup>	9,475
Civic Use	4	AC	1,680	GPD/AC <sup>1</sup>	6,720
Lake Water Replenishment	4	AC	1,540	GPD/AC <sup>2</sup>	6,161
<b>TOTAL DOMESTIC USES =</b>					<b>712,692</b>
<b>RECYCLED WATER</b>					
Parks (Recycled Water)	13	AC	3,445	GPD/AC <sup>3</sup>	44,785
Public Streets (Recycled Water)	9.93	AC	3,445	GPD/AC <sup>3</sup>	34,195
Private HOA Open Space	20.38	AC	3,445	GPD/AC <sup>3</sup>	70,209
<b>TOTAL RECYCLED WATER USES =</b>					<b>149,189</b>
<sup>1</sup> Table 1-2, City of Inglewood 25 Year Water Master Plan dated September 2003. <sup>2</sup> Geosyntec Water Balance Report. <sup>3</sup> 3.86 acre-feet/year per acre irrigation demand. Based on information from the California Irrigation Management Information System. Source: Hollywood Park Redevelopment Project Water Demands, Letter Report, Stetson Engineers, Inc., July 17, 2008.					

The 514.65 AF/yr is the total projected water demand for the three future developments that were factored into the 2005 UWMP based upon available water usage data and the projected water demand for Alternative RU 3,500. As Only 360.60 AF/yr of water was attributed to the three developments in the 2005 Urban Water Management Plan, a water deficit of 154.05 AF/yr would result from implementation of this Alternative.

Table IV.E-3 shows the water supply and demand comparison for Alternative RU 3,500. The water demand of 154.05 AF/yr (rounded off to 154 AF/yr) was added to the water demand values presented in the 2005 UWMP for the years shown. The results show that there is a deficit of water supply in the later years (2025 and/or 2030) for the normal water years and the multiple dry water year's scenarios resulting from the increased water demand associated with the implementation of this Alternative. The deficits under Alternative RU 3,500 are slightly higher than those shown for the Proposed Project. This is to be expected because the water demand for Alternative RU 3,500 is higher than under the Proposed Project.

**Table VI.E-3  
Water Supply and Demand Comparison for Alternative RU 3,500**

Normal Water Supply Year	Year				
	2010	2015	2020	2025	2030
Projected Supplies <sup>1</sup>	14,553	14,553	14,553	14,553	14,553
Projected Demand <sup>2,3</sup>	13,783	14,083	14,383	14,683	14,983
Difference	770	470	170	(130)	(430)
<b>Single Dry Water Year</b>					
Projected Supplies <sup>4</sup>	13,527	13,527	13,527	13,527	13,527
Projected Demand <sup>5,3</sup>	12,380	12,690	12,960	13,229	13,500
Difference	1,147	837	567	298	27
<b>Multiple Dry Water Years</b>					
Projected Supplies <sup>6</sup>	14,553	14,553	14,553	14,553	
Projected Demand <sup>7,3</sup>	13,783	14,083	14,383	14,682	
Difference	770	470	170	(129)	
<sup>1</sup> From Table 13 in the City of Inglewood 2005 UWMP. <sup>2</sup> From Table 13 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (154 AF) <sup>3</sup> Demand does not include additional demand for recycled water because it is presumed that the increase in demand for recycled water can be met without concern due to supply availability from WBMWD; adding the recycled water demand would skew the domestic analysis unfairly <sup>4</sup> From Table 16 in the City of Inglewood 2005 UWMP. <sup>5</sup> From Table 16 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (154 AF) <sup>6</sup> From Tables 19, 22, 25 & 28 in the City of Inglewood 2005 UWMP. <sup>7</sup> From Tables 19, 22, 25 & 28 in the City of Inglewood 2005 UWMP and increased by the additional domestic water demand for the Hollywood Park Redevelopment Project (154 AF) Source: Hollywood Park Redevelopment Project Water Demands, Letter Report, Stetson Engineers, Inc., July 17, 2008.					

Should the Alternative RU 3,500 be phased in over time, water demand impacts would be phased in as well. But ultimately, the full effect of the water demand impacts will be realized upon complete implementation of the project. At a minimum, the Hollywood Park Redevelopment Project would be responsible for providing the 154.05 AF/yr to meet its water demand resulting from Alternative RU 3,500. Ordinance No. 170,978 would still apply to Alternative RU 3,500, resulting in increased water conservation measures. Mitigation measures that are proposed for the Project are also required for Alternative RU 3,500 to secure a long term water supply, and the Alternative would impose conservation measures similar to those that would be imposed during dry or multiple dry years. As discussed in the Water Supply Assessment (Appendix F-6), the water supply deficit generated by Alternative RU 3,500 can be addressed through the acquisition of water rights, without impacts to the aquifer. Consequently, water supply impacts will be reduced to a less than significant level.

*Wastewater*

As shown in Table VI.E-4 below, Alternative RU 3,500 would generate a net increase of approximately 489,000 gpd of wastewater over existing conditions. In comparison to the Proposed Project, which is anticipated to generate 393,000 net gpd of wastewater, this Alternative would represent a 106,000 gpd

increase in wastewater generation. It is anticipated that the existing wastewater infrastructure would be sufficient to handle the increased wastewater generated under this Alternative. While the demand for sewer and wastewater services would be increased under this Alternative, impacts would remain less than significant.

**Table VI.E-4  
Estimated Wastewater Generation by Alternative RU 3,500**

Land Use	Unit/Quantity	Generation Rate (gpd/unit) <sup>a</sup>	Total (gallons/day)
<b>Existing</b>			
<b>Existing Uses<sup>b</sup></b>	--	--	524,000
<b>Subtotal Existing:</b>			
<b>Alternative RU 3,500</b>			
Residential	3,500 du	200gal/unit/day	700,000
Retail	620,000 sf	0.325 gal/sf/day	201,500
Casino	120,000 sf	0.35 gal/sf/day	42,000
Civic Use	4 Acres <sup>c</sup>	20 gal/student/day	16,000
Hotel (rooms)	300 rooms	125 gal/room/day	37,500
Hotel (meeting space)	20,000 sf	0.3 gal/sf/day	6,000
Office	25,000 sf	0.2 gal/sf/day	5,000
Open Space	25 AC	--	--
Community Space (HOA Recreation Facility)	10,000 sf	0.5 gal/sf/day	5,000
<b>Subtotal Proposed</b>			<b>1,013,000</b>
<b>Total Net Water Demand</b>			<b>489,000</b>
<b>Notes:</b>			
du: Dwelling units			
sf: Square feet			
<sup>a</sup> Generation Rates based on County Sanitation Districts of Los Angeles County wastewater generation rates. Uses not listed are estimated by the closest type of use available in the table.			
<sup>b</sup> Hall & Foreman, Inc., Hollywood Park Project, Utilities and Infrastructure Technical Report, August 29, 2008.			
<sup>c</sup> For purposes of analyzing the most environmentally intensive development of a civic use for this impact, this use was assumed to include the development of a school use with up to 800 students.			
Source: Christopher A. Joseph & Associates, July 2008.			

### Energy

#### Electricity

As shown in Table VI-E-5, below, Alternative RU 3,500 would consume a net increase of 9,030,726 kilowatt hours per year (KW-Hr/yr) of electricity. In comparison, the Proposed Project would result in a net increased demand of approximately 6,836,844 KW-Hr/yr of electricity per year. Similar to the Proposed Project, it is expected that existing electrical facilities would be sufficient to handle the increased loads of Alternative RU 3,500. Therefore, the energy demands for this Alternative would be less than significant.

**Table VI.E-5  
Estimated Electricity Demands – Alternative RU 3,500**

Land Use	Size (SF)	Demand (Kilowatt hours/unit/year) <sup>a</sup>	Total (kilowatt hours/year)
Existing Uses <sup>b</sup>	--		26,010,004
<b>Alternative RU 3,500</b>			
Residential	3,500 units	5,626.50 KW-Hr/unit	19,692,750
HOA Facility	10,000 sf	10.5 KW-Hr/sf/yr	105,000
Retail	620,000 sf	13.55 KW-Hr/sf/yr	8,401,000
Casino/OTB	120,000 sf	19.23 KW-Hr/sf/yr <sup>c</sup>	2,307,930
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	10.5 KW-Hr/sf/yr	772,800
Hotel			
300 Rooms <sup>f</sup>	210,000 sf	9.95 KW-Hr/sf/yr	2,089,500
Meeting Space	20,000 sf	12.95 KW-Hr/sf/yr	259,000
Office	25,000 sf	12.95 KW-Hr/sf/yr	323,750
Open Space	25 AC	1 KW-Hr/sf/yr	1,089,000
Subtotal Alternative	-	-	<b>35,040,730</b>
<b>Total Net Electricity Demand</b>			<b>9,030,726</b>
<p><i>Notes:</i>  <i>du: dwelling unit</i>  <i>sf: square feet</i>  <sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise.  <sup>b</sup> Hollywood Park Land Company, June 8, 2007.  <sup>c</sup> The electricity generation rate was based on existing electricity demands for the casino as provided by the Hollywood Park Land Company.  <sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this impact analysis, generation rates for public utilities are based on a school use because it would be the most intensive civic use for this impact.  <sup>e</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil).  <sup>f</sup> Hotel use based on 700 square feet per room.  Source: Christopher A. Joseph &amp; Associates, July 2008.</p>			

### Natural Gas

Under Alternative RU 3,500, an increase in approximately 3,500 new dwelling units would further increase demands for natural gas resources. Similar to the Proposed Project, this Alternative would draw an increased number of employees, residents and visitors to the Project Site. As shown in Table VI.E-6, below, Alternative RU 3,500 would generate a demand for a net increase in 23,175,800 cubic feet of natural gas per month. In comparison to the Proposed Project, this Alternative would result in an increased consumption of approximately 3,265,825 cubic feet of natural gas per month. Similar to the Proposed Project, it is expected that existing natural gas infrastructure would be sufficient to serve the



needs of this Alternative. Therefore, while demands for natural gas would be increased as compared to the Proposed Project, impacts to natural gas infrastructure and supplies would be less than significant.

**Table VI.E-6  
Estimated Natural Gas Consumption – Alternative RU 3,500**

Land Use	Unit/Quantity	Consumption Rate <sup>a</sup>	Total (cf/month)
Existing Uses <sup>b</sup>	--	--	3,894,900
<b>Alternative RU 3,500</b>			
Residential	3,500 units	6,665 cf/du/month	23,327,500
HOA Facility	10,000 sf	2 cf/sf/month	20,000
Office/Commercial	25,000 sf	2 cf/sf/month	50,000
Retail	620,000 sf	3 cf/sf/month	1,860,000
Casino/OTB	120,000 sf	4.80cf/sf/month	576,000
Hotel			
Rooms-300 Rooms <sup>c</sup>	210,000 sf	5 cf/sf/month	1,050,000
Meeting Space	20,000 sf	2 cf/sf/month	40,000
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	2 cf/sf/month	147,200
Open Space	25 AC	--	--
<b>Subtotal</b>			<b>27,070,700</b>
<b>Net Total</b>			<b>23,175,800</b>
<sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise. <sup>b</sup> Hollywood Park Land Company, June 8, 2007. <sup>c</sup> Hotel use based on 700 square feet per room. <sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this impact analysis, generation rates for public utilities are based on a school use because it would be the most intensive civic use for this impact.. <sup>e</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2008.			

### Solid Waste

Demolition activities under Alternative RU 3,500 would involve the same amount of demolition debris as the Proposed Project (i.e., 67,735 tons), since the same buildings would be removed from the site under either scenario and this Alternative would also involve the remodeling and reconfiguration of the casino as described for the Proposed Project. However, as this Alternative would result in an increase of floor area as compared to the Proposed Project, the amount of building construction waste generated under Alternative RU 3,500 would be more than the construction waste generated under the Proposed Project. As shown in Table VI.E-7, below, Alternative RU 3,500 would generate approximately 14,422 tons of construction debris, for a total of 82,157 tons of construction and demolition debris. As compared to the Proposed Project, this Alternative would result in an increased generation of solid waste by approximately

1,562 tons. While demands for solid waste disposal needs would be increased as compared to the Proposed Project, increased impacts to regional landfill capacity would be negligible as adequate landfill capacity is anticipated during the construction timeline for the proposed Alternative. Accordingly, Alternative RU 3,500 would have less than significant impacts on construction-related solid waste.

**Table VI.E-7  
Construction Solid Waste Generation – Alternative RU 3,500**

Construction Activity	Size (sf)	Rate (lbs./sf)	Generated Waste (tons)
<i>Demolition-Existing</i>		<i>Subtotal</i>	<b>67,735</b>
<i>Construction-Alternative RU 3,500</i>			
Residential <sup>a</sup>	3,500 units	4.38	11,498
HOA Facility	10,000 sf	3.89	19
Office/Commercial	25,000 sf	3.89	49
Retail	620,000 sf	3.89	1,206
Casino/OTB	120,000 sf	17.67	1,060
Hotel			
Rooms	300 rooms <sup>b</sup>	3.89	408
Meeting Space	20,000 sf	3.89	39
Civic Use <sup>c</sup>	4 AC <sup>d</sup>	3.89	143
Open Space	25 acres	N/A	-
		<i>Subtotal</i>	<b>14,422</b>
		<b>Total</b>	<b>82,157</b>
<sup>a</sup> Assumes an average of 1,500 sf per dwelling unit. <sup>b</sup> Based on an average of 700 sf per hotel room. <sup>c</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use. <sup>d</sup> Based on California Department of Education, 2000, <i>Guide to School Site Analysis and Development</i> . A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2008.			

As shown in Table VI.E-8, below, net operational solid waste generation for Alternative RU 3,500 would be approximately 13,976 tons of solid waste per day. As compared to the Proposed Project, this Alternative would result in an increased generation of solid waste by approximately 1,720 pounds per day. Operational-related solid waste impacts would be significant and unavoidable as regional landfill capacity for the life of the Alternative beyond 2015 has not been accommodated. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) operational solid waste impacts would be significant and unavoidable on project-specific and cumulative level.

**Table IV.E-8  
Estimated Operational Solid Waste Generation by Alternative RU 3,500**

Land Use	Unit/Quantity	Generation Rate <sup>a</sup> (lbs/unit/day)	Total (Pounds/Day)
<b>Existing Uses</b>			
Main Building/Grandstand	594,000	.006	3,564
Casino <sup>b</sup>	321,000	.005	1,605
		<i>Subtotal</i>	<b>5,169</b>
<b>Alternative RU 3,500</b>			
Residential	3,500 units	4.00 lbs/unit/day	14,000
HOA Facility	10,000 sf	0.006 lbs/sf/day	60
Office/Commercial	25,000 sf	0.006 lbs/sf/day	150
Retail	620,000 sf	0.005 lbs/sf/day	3,100
Casino/OTB	120,000 sf	0.005 lbs/sf/day	600
Hotel			
Rooms	300 rooms	2.0 lbs/room/day	600
Meeting Space	20,000 sf	0.006 lbs/sf/day	120
Civic Use <sup>c</sup>	4 AC	0.007 lbs/sf/day	515
Open Space	25 AC	--	--
		<i>Subtotal</i>	<b>19,145</b>
		<b>Net Total</b>	<b>13,976</b>
<sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table. <sup>b</sup> Does not include the Pavilion area which has been abandoned and is not in use. <sup>c</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2008.			

## Public Services

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

### Police Protection

The projected demand for police protection services is based on the number and types of land uses and anticipated on-site population. Since this Alternative would result in the development of more residences as compared to the Proposed Project, it would place an increased demand on the IPD for police protection services. Based on the number of sworn officers that are currently authorized for the IPD (i.e., 1.8 officers per 1,000 inhabitants), this Alternative would generate a demand for approximately 19 additional police officers, or roughly 3 more police officers than the Proposed Project. Similar to the Proposed Project, Alternative RU 3,500 would generate tax revenue that the City could use to hire new officers. Additionally, this Alternative would incorporate mitigation measures to reduce the potential for

increasing demands upon police services in the area, such as strategically positioned lighting, building security systems, and implementation of an on-site security plan. This Alternative would also include a police substation on the Project Site to be operated and staffed by the Inglewood Police Department. Therefore, the impact on police protection services under Alternative RU 3,500 would be less than significant.

#### *Fire Protection*

The projected demand for fire protection services is based on the amount and size of new structures on a site. Since this Alternative would result in an increase in the intensity of development as compared to the Proposed Project, it would place an increased demand on the LACoFD for fire protection services. As discussed in Section IV.K.2, Fire Protection, fire flow requirements would be determined by the LACoFD. Overall, the impact on fire protection services under this Alternative would be less than significant.

#### *Schools*

As shown in Table VI.E-9, Estimated Student Generation by Alternative RU 3,500, this Alternative is anticipated to yield approximately 625 K-12 students, including 303 elementary school students, 148 middle school students, and 174 high school students. Based on the existing school district boundary and school attendance areas, the 303 elementary school students generated from this Alternative would be required to attend Lane (Warren) K-8 School. Additionally, the projected students will be able to attend Kelso and Woodworth Elementary schools on a needed basis. These three schools are currently operating under capacity and can accommodate the projected students. If the schools were to be expanded, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, they could be financed by State and local bond funds, as well as developer fees.<sup>1</sup>

Monroe Middle School would serve the projected 148 middle school students, and Morningside High would serve the projected 174 high school students. While these schools are operating under capacity, it is anticipated that both schools could serve the incremental increase of middle and high school students. Expansion of the existing schools, including but not limited to the purchase and installation of additional temporary classrooms and/or the construction of new facilities, can be financed by State and local bond funds, as well as developer fees. As discussed in Section IV.K-3, Public Services - Schools, the Applicant and IUSD are discussing the possibility of a facility and financing program and mitigation agreement that would be mutually agreeable for all affected parties.<sup>2</sup> Impacts associated with the increase in student enrollment at nearby schools resulting from the Proposed Project are being jointly evaluated. The Applicant will work with IUSD to ensure that any new school that could be developed would be built

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<sup>1</sup> Government Code Section 65995(h). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

<sup>2</sup> Government Code Section 65995.7(c). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

in accordance to local and state standards and requirements and are available for all Project students. If no mitigation agreement is completed, the Applicant would be required to pay the adopted Developer Fees, which would fully and completely mitigate all school impacts.<sup>3</sup> Therefore, impacts to school facilities under Alternative RU 3,500 would be less than significant.

**Table VI.E-9  
Estimated Student Generation by Alternative RU 3,500**

Product Type	Student Projections			
	K-5	6-8	9-12	K-12
Single Family Detached	132	63	72	267
Single Family Attached	102	56	77	253
Multi-Family	51	29	26	105
<b>TOTAL</b>	<b>303</b>	<b>148</b>	<b>174</b>	<b>625</b>
<b>Classrooms<sup>a</sup></b>	<b>12</b>	<b>6</b>	<b>7</b>	<b>23</b>

<sup>a</sup> Classroom size is based on state standards of 25 students per elementary classroom and 27 students per middle and high school classrooms.

#### *Recreation and Parks*

Under the Proposed Project, the Project Applicant is proposing to provide 25-acres of open space that would be available for community use. This Alternative would also include 25-acres of open space, however this Alternative would include an additional 505 dwelling units that would place an increased demand on recreation and parks as compared to the Proposed Project. Based on a standard goal of one acre per 1,000 persons, this Alternative would generate a need for approximately 10.5 acres of open space. The Alternative would provide approximately 2.4 acres per 1,000 residents, and thus provides an amount of parks and open space in excess of the General Plan goal. Therefore, Alternative RU 3,500 would result in less than significant impacts on recreation and parks.

#### *Libraries*

Alternative RU 3,500 would generate approximately 10,500 new residents to the City of Inglewood, generating an increased demand for library services. Based on written correspondence from the IPL, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels. Alternative 3,500 would generate tax revenue that the City could use to expand library services if necessary. Additionally, this Alternative, like the Proposed Project, includes a 4-acre civic site which could be used as a joint us school, including a library that can be utilized by all city residents. Therefore, Alternative RU 3,500 would result in a less-than-significant impact to the Inglewood Library system and this impact would be slightly increased as compared to the Proposed Project.

<sup>3</sup> Government Code Section 65995(h). Web accessed on 5/19/2008, Jeanette C. Justus Associates.

**Traffic and Transportation**

Impacts on traffic and transportation under the Proposed Project would be less than significant after mitigation. The site access scheme under the Alternative RU 3,500 would be consistent with the Proposed Project.

**Alternative RU 3500 Weekday Trip Generation Summary**

The weekday trip generation forecast for Alternative RU 3,500 is summarized in Table VI.E-10. As presented in Table VI.E-10, Alternative RU 3,500 is expected to generate an additional 1,690 vehicle trips (539 more inbound trips and 1,151 more outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, Alternative RU 3,500 is expected to generate an additional 141 vehicle trips (1,444 more inbound trips and 1,303 fewer outbound trips). Over a 24-hour period, Alternative RU 3,500 project is forecast to generate an additional 19,348 daily trip ends during a typical weekday (9,674 inbound trips and 9,674 outbound trips).

**Table VI.E-10  
Alternative RU 3,500 Weekday Trip Generation <sup>a</sup>**

Land Use	Size	Daily Trip Ends <sup>b</sup> Volumes	AM Peak Hour Volumes <sup>b</sup>			PM Peak Hour Volumes <sup>b</sup>		
			In	Out	Total	In	Out	Total
Shopping Center <sup>c</sup>	620,000 GLSF	15,406	193	124	317	679	735	1,414
Casino/OTB <sup>d</sup>	120,000 SF	4,926	201	140	341	371	614	985
Residential	3,500 DU	14,952	184	900	1,084	888	437	1,325
Civic Use <sup>e</sup>	800 Students/30,000 SF	810	69	57	126	51	55	106
Hotel	300 rms/ 20,000sf mtg. space	2,820	123	86	209	102	117	219
Office	25,000	370	41	5	46	13	66	79
<b>Subtotal</b>		39,284	811	1,312	2,123	2,104	2,204	4,128
Existing Uses to be Removed	10,000 Attend.	(19,936)	(272)	(161)	(433)	(660)	(3,327)	(3,987)
<b>Net Total Trip Generation</b>		19,348	539	1,151	1,690	1,444	(1,303)	141

Notes:

<sup>a</sup> Source: ITE "trip Generation" 7<sup>th</sup> Edition, 2003.

<sup>b</sup> Trips are one-way traffic movements, entering or leaving.

<sup>c</sup> ITE Land Use Code 820 (shopping Center) trip generation equation rates were applied to the combined 620,000 SF commercial (retail and restaurants).

<sup>d</sup> Based on weekday traffic count data collected on Thursday, September 28, 2006, at the various Hollywood Park driveways. No live horse racing event was held. Daily trips were calculated based on the assumption that number of PM peak hour trips represents 20% of the daily traffic volumes.

<sup>e</sup> For purposes of analyzing Weekday traffic impacts, it was assumed during the weekday AM peak hour that the civic sue could be developed as an elementary school with 800 students since that civic use would generate the most traffic during the AM peak hour. It was assumed that during the daily PM peak hour that the civic use could be developed as a 30,000 sf library since a library generates more PM peak hour traffic impacts than an elementary school.

Source: Linscott Law and Greenspan Engineers, August 1, 2008. (See Appendix G-1 for internal trip reduction assumptions).

### Alternative RU 3,500 Weekend Trip Generation Summary

The Saturday trip generation forecast for Alternative RU 3,500 is summarized in Table VI.E-11. As presented in Table VI.E-11, Alternative RU 3,500 is expected to generate an additional 1,569 vehicle trips (209 more inbound trips and 1,360 more outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, the Alternative RU 3,500 project is forecast to generate an additional 27,790 daily trip ends during a typical weekend day (approximately 13,895 inbound trips and 13,895 outbound trips).

**Table VI.E-11**  
**Alternative RU 3,500 Weekend Trip Generation<sup>a</sup>**

Land Use	Size	Daily Trip Ends Volumes <sup>b</sup>	Midday Peak Hour Volumes <sup>b</sup>		
			In	Out	Total
Shopping Center <sup>c</sup>	620,000 GLSF	19,424	971	895	1,866
Casino/OTB <sup>d</sup>	120,000 SF	5,136	592	435	1,027
Residential	3,500 DU	13,462	597	509	1,106
Civic Use <sup>e</sup>	30,000 SF	698	54	47	101
Hotel	300 rms/ 20,000sf mtg. space	2,998	143	115	258
Office	25,000	58	4	4	8
<b>Subtotal</b>		41,776	2,361	2,005	4,366
Existing Uses to be Removed	10,000 Attend.	(13,986)	(2,152)	(645)	(2,797)
<b>Net Total Trip Generation</b>		<b>27,790</b>	<b>209</b>	<b>1,360</b>	<b>1,569</b>

Notes:

<sup>a</sup> Source: ITE "trip Generation" 7<sup>th</sup> Edition, 2003.

<sup>b</sup> Trips are one-way traffic movements, entering or leaving.

<sup>c</sup> ITE Land Use Code 820 (shopping Center) trip generation equation rates were applied to the combined 620,000 SF commercial (retail and restaurants).

<sup>d</sup> Based on weekday traffic count data collected on Thursday, September 28, 2006, at the various Hollywood Park driveways. No live horse racing event was held. Daily trips were calculated based on the assumption that number of PM peak hour trips represents 20% of the daily traffic volumes.

<sup>e</sup> To analyze weekend traffic impacts, it was assumed that the civic site would be developed as a library since a library generates more weekend traffic than an elementary school.

Source: Linscott Law and Greenspan Engineers, August 1, 2008. (See Appendix G-1 for internal trip reduction assumptions).

### Traffic Impact Comparison

#### Alternative RU 3,500 Project Impact Analysis

In order to determine the operating conditions of the street system in the year 2014 with the Alternative RU 3,500 project, traffic associated with the Alternative RU 3,500 project was assigned to the local roadway system based on the trip distribution and assignment characteristics consistent with the Proposed Project.

As shown in Table VI.E-12, application of the City of Inglewood's threshold criteria to the "With Alternative RU 3,500 Project" scenario indicates that the Alternative RU 3,500 project is expected to create a significant impact at six of the study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour. Incremental but not significant impacts are noted at the remaining 60 study intersections due to the Alternative RU 3,500 project.

The six study intersections forecast to be significantly impacted by the Alternative RU 3,500 project are intersections forecast to be significantly impacted by the Proposed Project. The traffic mitigation measures recommended for the Proposed Project are anticipated to reduce the traffic impacts associated with the Alternative RU 3,500 project to less than significant levels at five of the six impacted study intersections. Additional mitigation measures beyond those identified for the Proposed Project will be necessary in order to mitigate the impact due to the Alternative RU 3,500 project to less than significant levels at the intersection of Crenshaw Boulevard and Century Boulevard. The following additional mitigation measures are proposed:

- Int. No. 47: Crenshaw Boulevard/Century Boulevard

In addition to the mitigation measures recommended for the proposed project, widen and restripe Crenshaw Boulevard north of Century Boulevard to provide a southbound right-turn only lane. The resultant southbound approach lane configuration would provide one left-turn lane, three through lanes, and one right-turn only lane. It should be noted that the existing sidewalk widths on Crenshaw Boulevard north of Century Boulevard may need to be reduced to accommodate this measure. In addition, modify the existing traffic signal to provide a southbound right-turn overlapping phase to be operated concurrently during the eastbound left-turn phase. As shown in Appendix G-1 to the Draft EIR (see Table E-3), the proposed mitigation measures are expected to mitigate the forecast alternative project impact at this intersection to less than significant levels.

#### *Alternative RU 3,500 Cumulative Impact Analysis*

The v/c ratio at the 66 study intersections are incrementally increased by the addition of traffic generated by other related projects. As summarized in Table VI.E-12, application of the City's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative development of the Alternative RU 3,500 project and the related projects are expected to create cumulative impacts at 27 study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour. Incremental, but not significant, cumulative impacts are noted at the remaining 39 study intersections.

Of the 27 study intersections forecast to be cumulatively impacted by the Alternative RU 3,500 project and the related projects, 26 are forecast to be cumulatively impacted by the proposed project and the related projects. It should be noted that the intersection of La Brea Avenue and Arbor Vitae Street, which is not forecast to be cumulatively impacted by the Proposed Project and the related projects, is forecast to be cumulatively impacted by Alternative RU 3,500 and the related projects. The cumulative



**Table VI.E-12  
Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -  
AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS
1	AM	0.704	C	0.739	C	0.752	C	0.013	0.752	C	0.013	0.945	E	0.206	0.889	D	0.150
	PM	0.721	C	0.757	C	0.763	C	0.006	0.763	C	0.006	<b>1.056</b>	F	<b>0.299</b>	<b>0.981</b>	E	<b>0.224</b>
	SAT	0.710	C	0.746	C	0.758	C	0.012	0.758	C	0.012	0.903	E	0.157	0.834	D	0.088
2	AM	0.762	C	0.800	C	0.814	D	0.014	0.814	D	0.014	<b>1.156</b>	F	<b>0.356</b>	<b>0.952</b>	E	<b>0.152</b>
	PM	0.839	D	0.881	D	0.887	D	0.006	0.887	D	0.006	<b>1.178</b>	F	<b>0.297</b>	<b>0.985</b>	E	<b>0.104</b>
	SAT	0.665	B	0.698	B	0.711	C	0.013	0.711	C	0.013	<b>1.095</b>	F	<b>0.397</b>	<b>0.889</b>	D	<b>0.191</b>
3	AM	0.704	C	0.736	C	0.745	C	0.009	0.745	C	0.009	0.892	D	0.156	0.792	C	0.056
	PM	0.850	D	0.889	D	0.900	D	0.011	0.900	D	0.011	<b>1.080</b>	F	<b>0.191</b>	<b>0.980</b>	E	<b>0.091</b>
	SAT	0.711	C	0.743	C	0.751	C	0.008	0.751	C	0.008	0.866	D	0.123	0.766	C	0.023
4	AM	0.730	C	0.762	C	0.772	C	0.010	0.772	C	0.010	0.923	E	0.161	0.923	E	0.161
	PM	0.613	B	0.640	B	0.647	B	0.007	0.647	B	0.007	0.781	C	0.141	0.781	C	0.141
	SAT	0.583	A	0.608	B	0.615	B	0.007	0.615	B	0.007	0.714	C	0.106	0.714	C	0.106
5	AM	0.853	D	0.896	D	0.909	E	0.013	0.909	E	0.013	<b>1.032</b>	F	<b>0.136</b>	<b>0.847</b>	D	<b>-0.049</b>
	PM	0.823	D	0.864	D	0.822	D	-0.042	0.822	D	-0.042	0.937	E	0.073	0.850	D	-0.014
	SAT	0.769	C	0.807	D	0.818	D	0.011	0.818	D	0.011	0.900	D	0.093	0.742	C	-0.065
6	AM	0.739	C	0.776	C	0.779	C	0.003	0.779	C	0.003	0.798	C	0.022	0.798	C	0.022
	PM	0.864	D	0.907	E	0.916	E	0.009	0.916	E	0.009	0.954	E	0.047	0.954	E	0.047
	SAT	0.668	B	0.701	C	0.708	C	0.007	0.708	C	0.007	0.731	C	0.030	0.731	C	0.030
7	AM	0.959	E	1.008	F	1.021	F	0.013	1.021	F	0.013	<b>1.136</b>	F	<b>0.128</b>	<b>1.009</b>	F	<b>0.001</b>
	PM	0.918	E	0.965	E	0.994	E	0.029	0.994	E	0.029	<b>1.121</b>	F	<b>0.156</b>	<b>1.000</b>	E	<b>0.035</b>
	SAT	0.828	D	0.869	D	0.878	D	0.009	0.878	D	0.009	0.992	E	0.123	0.874	D	0.005
8	AM	1.005	F	1.052	F	1.051	F	-0.001	1.051	F	-0.001	1.141	F	0.089	1.141	F	0.089
	PM	0.815	D	0.852	D	0.851	D	-0.001	0.851	D	-0.001	1.023	F	0.171	1.023	F	0.171
	SAT	0.726	C	0.759	C	0.741	C	-0.018	0.741	C	-0.018	0.911	E	0.152	0.911	E	0.152

**Table VI.E-12 (Continued)**  
**Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -**  
**AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS		
9	I-405 Freeway NB Ramps/Manchester Boulevard <sup>d</sup>	AM	0.884	D	0.925	E	0.926	E	0.001	0.926	E	0.001	0.985	E	0.060	0.985	E	0.060
	PM	0.681	B	0.711	C	0.704	C	-0.007	0.704	C	-0.007	0.866	D	0.155	0.866	D	0.155	
	SAT	0.569	A	0.593	A	0.593	A	0.000	0.593	A	0.000	0.725	C	0.132	0.725	C	0.132	
10	La Cienega Boulevard/Arbor Vitae Street <sup>d</sup>	AM	0.800	C	0.836	D	0.837	D	0.001	0.837	D	0.001	0.870	D	0.034	0.770	C	-0.066
	PM	0.961	E	1.006	F	1.014	F	0.008	1.014	F	0.008	<b>1.104</b>	<b>F</b>	<b>0.098</b>	<b>1.004</b>	<b>F</b>	<b>-0.002</b>	
	SAT	0.509	A	0.531	A	0.508	A	-0.023	0.508	A	-0.023	0.611	B	0.080	0.511	A	-0.020	
11	La Cienega Boulevard/I-405 Freeway SB Ramps (n/o Century Boulevard) <sup>b</sup>	AM	0.837	D	0.879	D	0.900	D	0.021	0.900	D	0.021	0.960	E	0.081	0.960	E	0.081
	PM	0.610	B	0.640	B	0.689	B	0.049	0.689	B	0.049	0.765	C	0.125	0.765	C	0.125	
	SAT	0.465	A	0.488	A	0.510	A	0.022	0.510	A	0.022	0.594	A	0.106	0.594	A	0.106	
12	La Cienega Boulevard/Century Boulevard <sup>b</sup>	AM	0.733	C	0.770	C	0.824	D	0.054	0.824	D	0.054	0.889	D	0.119	0.818	D	0.048
	PM	0.690	B	0.724	C	0.783	C	0.059	0.783	C	0.059	<b>1.034</b>	<b>F</b>	<b>0.310</b>	<b>0.979</b>	<b>E</b>	<b>0.255</b>	
	SAT	0.530	A	0.556	A	0.658	B	0.102	0.658	B	0.102	0.991	E	0.435	0.943	E	0.387	
13	La Cienega Boulevard/I-405 Freeway SB Ramps (s/o Century Boulevard) <sup>b</sup>	AM	0.455	A	0.477	A	0.509	A	0.032	0.509	A	0.032	0.560	A	0.083	0.560	A	0.083
	PM	0.577	A	0.605	B	0.578	A	-0.027	0.578	A	-0.027	0.661	B	0.056	0.661	B	0.056	
	SAT	0.385	A	0.404	A	0.442	A	0.038	0.442	A	0.038	0.529	A	0.125	0.529	A	0.125	
14	I-405 Freeway NB Ramps/Century Boulevard <sup>d</sup>	AM	0.814	D	0.851	D	0.909	E	0.058	0.909	E	0.058	0.961	E	0.110	0.861	D	0.010
	PM	0.661	B	0.690	B	0.779	C	0.089	0.779	C	0.089	0.957	E	0.267	0.857	D	0.167	
	SAT	0.446	A	0.464	A	0.517	A	0.053	0.517	A	0.053	0.799	C	0.335	0.699	B	0.235	
15	Inglewood Avenue/Arbor Vitae Street <sup>d</sup>	AM	0.930	E	0.973	E	0.982	E	0.009	0.982	E	0.009	<b>1.073</b>	<b>F</b>	<b>0.100</b>	<b>0.924</b>	<b>E</b>	<b>-0.049</b>
	PM	0.913	E	0.955	E	0.996	E	0.041	0.996	E	0.041	<b>1.134</b>	<b>F</b>	<b>0.179</b>	<b>0.911</b>	<b>E</b>	<b>-0.044</b>	
	SAT	0.688	B	0.718	C	0.705	C	-0.013	0.705	C	-0.013	0.824	D	0.106	0.824	D	0.106	
16	Inglewood Avenue/Century Boulevard <sup>d</sup>	AM	0.744	C	0.777	C	0.837	D	0.060	0.837	D	0.060	0.898	D	0.121	0.798	C	0.021
	PM	0.780	C	0.816	D	0.885	D	0.069	0.885	D	0.069	<b>1.046</b>	<b>F</b>	<b>0.230</b>	<b>0.946</b>	<b>E</b>	<b>0.130</b>	
	SAT	0.590	A	0.615	B	0.680	B	0.065	0.680	B	0.065	0.862	D	0.247	0.762	C	0.147	

**Table VI.E-12 (Continued)**  
**Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -**  
**AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS		
17	La Brea Avenue/ Slauson Avenue <sup>c</sup>	AM	0.768	C	0.803	D	0.834	D	0.031	0.834	D	0.031	<b>1.002</b>	F	<b>0.199</b>	<b>0.861</b>	D	<b>0.058</b>
	PM	0.895	D	0.937	E	0.974	E	0.037	0.974	E	0.037	<b>1.174</b>	F	<b>0.237</b>	<b>0.977</b>	E	<b>0.040</b>	
	SAT	0.800	C	0.837	D	0.858	D	0.021	0.858	D	0.021	<b>1.072</b>	F	<b>0.235</b>	<b>0.901</b>	E	<b>0.064</b>	
18	La Brea Avenue/ Centinela Avenue <sup>d</sup>	AM	0.925	E	0.968	E	<b>1.008</b>	F	<b>0.040</b>	<b>0.908</b>	E	<b>-0.060</b>	1.048	F	0.080	1.048	F	0.080
	PM	0.829	D	0.867	D	0.871	D	0.004	0.771	C	-0.096	0.989	E	0.122	0.989	E	0.122	
	SAT	0.886	D	0.927	E	0.976	E	0.049	0.876	D	-0.051	1.091	F	0.164	1.091	F	0.164	
19	La Brea Avenue/ Florence Avenue <sup>d</sup>	AM	1.153	F	1.208	F	<b>1.241</b>	F	<b>0.033</b>	<b>1.141</b>	F	<b>-0.067</b>	1.220	F	0.012	1.220	F	0.012
	PM	1.109	F	1.162	F	<b>1.197</b>	F	<b>0.035</b>	<b>1.097</b>	F	<b>-0.065</b>	1.253	F	0.091	1.253	F	0.091	
	SAT	0.716	C	0.748	C	0.771	C	0.023	0.671	B	-0.077	0.842	D	0.094	0.842	D	0.094	
20	La Brea Avenue/ Manchester Boulevard <sup>d</sup>	AM	0.916	E	0.959	E	0.983	E	0.024	0.983	E	0.024	<b>1.116</b>	F	<b>0.157</b>	<b>0.917</b>	E	<b>-0.042</b>
	PM	0.754	C	0.788	C	0.780	C	-0.008	0.780	C	-0.008	1.046	F	0.258	0.905	E	0.117	
	SAT	0.848	D	0.887	D	0.930	E	0.043	0.930	E	0.043	<b>1.230</b>	F	<b>0.343</b>	<b>0.973</b>	E	<b>0.086</b>	
21	La Brea Avenue/ Arbor Vitae Street <sup>d</sup>	AM	0.643	B	0.671	B	0.686	B	0.015	0.686	B	0.015	0.751	C	0.080	0.651	B	-0.020
	PM	0.787	C	0.822	D	0.859	D	0.037	0.859	D	0.037	1.003	F	0.181	0.903	E	0.081	
	SAT	0.637	B	0.665	B	0.640	B	-0.025	0.640	B	-0.025	0.810	D	0.145	0.710	C	0.045	
22	La Brea Avenue/ Century Boulevard <sup>d</sup>	AM	0.783	C	0.819	D	0.875	D	0.056	0.775	C	-0.044	0.867	D	0.048	0.867	D	0.048
	PM	0.893	D	0.934	E	<b>1.005</b>	F	<b>0.071</b>	<b>0.905</b>	E	<b>-0.029</b>	1.105	F	0.171	1.105	F	0.171	
	SAT	0.738	C	0.771	C	0.828	D	0.057	0.728	C	-0.043	1.011	F	0.240	1.011	F	0.240	
23	Hawthorne Boulevard/ Imperial Highway <sup>c</sup>	AM	0.799	C	0.835	D	0.841	D	0.006	0.841	D	0.006	0.940	E	0.105	0.756	C	-0.079
	PM	0.910	E	0.952	E	0.964	E	0.012	0.964	E	0.012	<b>1.385</b>	F	<b>0.433</b>	<b>0.987</b>	E	<b>0.035</b>	
	SAT	0.599	A	0.625	B	0.642	B	0.017	0.642	B	0.017	0.950	E	0.325	0.653	B	0.028	
24	Centinela Avenue/ Florence Avenue <sup>d</sup>	AM	0.950	E	0.994	E	1.003	F	0.009	1.003	F	0.009	<b>1.071</b>	F	<b>0.077</b>	<b>0.916</b>	E	<b>-0.078</b>
	PM	0.942	E	0.985	E	1.001	F	0.016	1.001	F	0.016	<b>1.145</b>	F	<b>0.160</b>	<b>0.921</b>	E	<b>-0.064</b>	
	SAT	0.694	B	0.725	C	0.745	C	0.020	0.745	C	0.020	0.853	D	0.128	0.704	C	-0.021	

**Table VI.E-12 (Continued)**  
**Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -**  
**AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	V/C	LOS	V/C	V/C	LOS	V/C	LOS	V/C	LOS	
25	Prairie Avenue/ Florence Avenue <sup>d</sup>	AM	0.984	E	1.030	F	<b>1.056</b>	F	<b>0.026</b>	<b>0.956</b>	E	<b>-0.074</b>	1.023	F	-0.007	1.023	F	-0.007
	PM	0.975	E	1.020	F	<b>1.050</b>	F	<b>0.030</b>	<b>0.950</b>	E	<b>-0.070</b>	1.089	F	0.069	1.089	F	0.069	
	SAT	0.634	B	0.662	B	0.641	B	-0.021	0.541	A	-0.121	0.675	B	0.013	0.675	B	0.013	
26	Prairie Avenue/ Manchester Boulevard <sup>d</sup>	AM	0.688	B	0.719	C	0.747	C	0.028	0.747	C	0.028	0.842	D	0.123	0.742	C	0.023
	PM	0.901	E	0.942	E	0.993	E	0.051	0.993	E	0.051	<b>1.185</b>	F	<b>0.243</b>	<b>0.992</b>	E	<b>0.050</b>	
	SAT	0.719	C	0.751	C	0.742	C	-0.009	0.742	C	-0.009	0.974	E	0.223	0.833	D	0.082	
27	Prairie Avenue/ Kelso Street-Pincay Drive <sup>d</sup>	AM	0.554	A	0.577	A	0.674	B	0.097	0.674	B	0.097	0.723	C	0.146	0.723	C	0.146
	PM	0.769	C	0.804	D	0.752	C	-0.052	0.752	C	-0.052	0.980	E	0.176	0.980	E	0.176	
	SAT	0.520	A	0.541	A	0.650	B	0.109	0.650	B	0.109	0.946	E	0.405	0.946	E	0.405	
28	Prairie Avenue/ Arbor Vitae Street-Gate 2 <sup>d</sup>	AM	0.553	A	0.576	A	0.612	B	0.036	0.612	B	0.036	0.682	B	0.106	0.682	B	0.106
	PM	0.794	C	0.826	D	0.750	C	-0.076	0.750	C	-0.076	0.912	E	0.086	0.912	E	0.086	
	SAT	0.731	C	0.751	C	0.654	B	-0.097	0.654	B	-0.097	0.860	D	0.109	0.860	D	0.109	
29	Prairie Avenue/ Hardy Street-Gate 3 <sup>d</sup>	AM	0.449	A	0.467	A	0.546	A	0.079	0.546	A	0.079	0.579	A	0.112	0.579	A	0.112
	PM	0.760	C	0.785	C	0.658	B	-0.127	0.658	B	-0.127	0.739	C	-0.046	0.739	C	-0.046	
	SAT	0.739	C	0.754	C	0.643	B	-0.111	0.643	B	-0.111	0.740	C	-0.014	0.740	C	-0.014	
30	Prairie Avenue/ Century Boulevard <sup>d</sup>	AM	0.814	D	0.851	D	0.891	D	0.040	0.891	D	0.040	<b>1.035</b>	F	<b>0.184</b>	<b>0.935</b>	E	<b>0.084</b>
	PM	0.982	E	1.028	F	1.019	F	-0.009	1.019	F	-0.009	1.467	F	0.439	1.367	F	0.339	
	SAT	0.964	E	1.009	F	1.004	F	-0.005	1.004	F	-0.005	1.672	F	0.663	1.572	F	0.563	
31	Prairie Avenue/ I-105 Freeway EB -WB Off Ramps- 112th Street <sup>d</sup>	AM	0.668	B	0.697	B	0.730	C	0.033	0.730	C	0.033	0.822	D	0.125	0.822	D	0.125
	PM	0.756	C	0.790	C	0.713	C	-0.077	0.713	C	-0.077	0.926	E	0.136	0.926	E	0.136	
	SAT	0.669	B	0.699	B	0.733	C	0.034	0.733	C	0.034	0.992	E	0.293	0.992	E	0.293	
32	I-105 Freeway EB On Ramp-Freeman Avenue/Imperial Highway <sup>e</sup>	AM	0.699	B	0.730	C	0.743	C	0.013	0.743	C	0.013	0.834	D	0.104	0.834	D	0.104
	PM	0.548	A	0.572	A	0.539	A	-0.033	0.539	A	-0.033	0.749	C	0.177	0.749	C	0.177	
	SAT	0.546	A	0.570	A	0.584	A	0.014	0.584	A	0.014	0.786	C	0.216	0.786	C	0.216	

**Table VI.E-12 (Continued)**  
**Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -**  
**AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS		
33	Prairie Avenue/ Imperial Highway <sup>e</sup>	AM	0.868	D	0.908	E	0.922	E	0.014	0.922	E	0.014	<b>1.005</b>	F	<b>0.097</b>	<b>0.905</b>	E	<b>-0.003</b>
	PM	0.872	D	0.912	E	0.868	D	-0.044	0.868	D	-0.044	1.020	F	0.108	0.920	E	0.008	
	SAT	0.686	B	0.717	C	0.735	C	0.018	0.735	C	0.018	0.985	E	0.268	0.885	D	0.168	
34	Cemetery Driveway- Kareem Court/ Manchester Boulevard <sup>d</sup>	AM	0.593	A	0.618	B	0.624	B	0.006	0.624	B	0.006	0.669	B	0.051	0.669	B	0.051
	PM	0.491	A	0.512	A	0.462	A	-0.050	0.462	A	-0.050	0.673	B	0.161	0.673	B	0.161	
	SAT	0.387	A	0.402	A	0.395	A	-0.007	0.395	A	-0.00	0.662	B	0.260	0.662	B	0.260	
35	Crenshaw Drive-Briarwood Lane/ Manchester Boulevard <sup>d</sup>	AM	0.913	E	0.955	E	0.966	E	0.011	0.966	E	0.011	<b>1.021</b>	F	<b>0.066</b>	<b>0.921</b>	E	<b>-0.034</b>
	PM	0.552	A	0.576	A	0.571	A	-0.005	0.571	A	-0.005	0.720	C	0.144	0.620	B	0.044	
	SAT	0.577	A	0.602	B	0.597	A	-0.005	0.597	A	-0.005	0.759	C	0.157	0.659	B	0.057	
36	Kareem Court-Gate 8 Pinecay Drive <sup>d</sup>	AM	0.275	A	0.284	A	0.313	A	0.029	0.313	A	0.029	0.391	A	0.107	0.391	A	0.107
	PM	0.334	A	0.345	A	0.308	A	-0.037	0.308	A	-0.037	0.859	D	0.5014	0.859	D	0.514	
	SAT	0.237	A	0.246	A	0.272	A	0.026	0.272	A	0.026	0.985	E	0.739	0.985	E	0.739	
37	Carlton Drive-Gate 7-7A Pinecay Drive <sup>d</sup>	AM	0.310	A	0.320	A	0.497	A	0.177	0.497	A	0.177	0.542	A	0.222	0.542	A	0.222
	PM	0.332	A	0.339	A	0.468	A	0.029	0.468	A	0.029	0.586	A	0.247	0.586	A	0.247	
	SAT	0.306	A	0.312	A	0.469	A	0.157	0.469	A	0.157	0.606	B	0.294	0.606	B	0.294	
38	Doty Avenue-Gate 4/ Century Boulevard <sup>d</sup>	AM	0.410	A	0.424	A	0.504	A	0.080	0.504	A	0.080	0.570	A	0.146	0.470	A	0.046
	PM	0.590	A	0.608	B	0.754	C	0.146	0.754	C	0.146	0.960	E	0.352	0.860	D	0.252	
	SAT	0.650	B	0.662	B	0.797	C	0.135	0.797	C	0.135	<b>1.086</b>	F	<b>0.424</b>	<b>0.986</b>	E	<b>0.324</b>	
39	Yukon Avenue-Gate 5/ Century Boulevard <sup>d</sup>	AM	0.408	A	0.424	A	0.632	B	0.208	0.632	B	0.208	0.698	B	0.274	0.501	A	0.177
	PM	0.719	C	0.751	C	0.847	D	0.096	0.847	D	0.096	<b>1.069</b>	F	<b>0.318</b>	<b>0.895</b>	D	<b>0.144</b>	
	SAT	0.678	B	0.708	C	0.835	D	0.127	0.835	D	0.127	<b>1.104</b>	F	<b>0.396</b>	<b>0.969</b>	E	<b>0.261</b>	
40	Club Drive/ Century Boulevard <sup>d</sup>	AM	0.494	A	0.515	A	0.547	A	0.032	0.547	A	0.032	0.613	B	0.098	0.513	A	-0.002
	PM	0.641	B	0.670	B	0.740	C	0.070	0.740	C	0.070	0.946	E	0.276	0.846	D	0.176	
	SAT	0.670	B	0.699	B	0.754	C	0.055	0.754	C	0.055	<b>1.034</b>	F	<b>0.335</b>	<b>0.934</b>	E	<b>0.235</b>	

**Table VI.E-12 (Continued)**  
**Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -**  
**AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS		V/C	LOS		V/C	LOS		
41	Crenshaw Boulevard/ Slauson Avenue <sup>b</sup>	AM	0.815	D	0.852	D	0.851	D	-0.001	0.851	D	-0.001	1.025	F	0.173	0.955	E	0.103
	PM	0.769	C	0.803	D	0.827	D	0.024	0.827	D	0.024	<b>1.031</b>	<b>F</b>	<b>0.228</b>	<b>0.961</b>	<b>E</b>	<b>0.158</b>	
	SAT	0.965	E	1.010	F	1.004	F	-0.006	1.004	F	-0.006	1.204	F	0.194	1.134	F	0.124	
42	Crenshaw Boulevard/ Florence Avenue <sup>b</sup>	AM	0.784	C	0.820	D	0.833	D	0.013	0.833	D	0.013	0.911	E	0.091	0.841	D	0.021
	PM	0.750	C	0.784	C	0.804	D	0.020	0.804	D	0.020	0.932	E	0.148	0.862	D	0.078	
	SAT	0.790	C	0.826	D	0.831	D	0.005	0.831	D	0.005	<b>1.024</b>	<b>F</b>	<b>0.198</b>	<b>0.954</b>	<b>E</b>	<b>0.128</b>	
43	Crenshaw Boulevard/ 82nd Street-Crenshaw Drive <sup>d</sup>	AM	0.548	A	0.569	A	0.586	A	0.017	0.586	A	0.017	0.617	B	0.048	0.617	B	0.048
	PM	0.507	A	0.525	A	0.520	A	-0.005	0.520	A	-0.005	0.604	B	0.079	0.604	B	0.079	
	SAT	0.501	A	0.520	A	0.558	A	0.038	0.558	A	0.038	0.668	B	0.148	0.668	B	0.148	
44	Crenshaw Boulevard/ 8th Avenue <sup>d</sup>	AM	0.572	A	0.597	A	0.614	B	0.017	0.614	B	0.017	0.631	B	0.034	0.631	B	0.034
	PM	0.471	A	0.490	A	0.501	A	0.011	0.501	A	0.011	0.554	A	0.064	0.554	A	0.064	
	SAT	0.482	A	0.501	A	0.531	A	0.030	0.531	A	0.030	0.605	B	0.104	0.605	B	0.104	
45	Crenshaw Boulevard/ Manchester Boulevard <sup>d</sup>	AM	0.719	C	0.751	C	0.782	C	0.031	0.682	B	-0.069	0.732	C	-0.019	0.732	C	-0.019
	PM	0.947	E	0.991	E	<b>1.024</b>	<b>F</b>	<b>0.033</b>	<b>0.924</b>	<b>E</b>	<b>-0.067</b>	1.156	F	0.165	1.156	F	0.165	
	SAT	0.964	E	1.009	F	<b>1.054</b>	<b>F</b>	<b>0.045</b>	<b>0.954</b>	<b>E</b>	<b>-0.055</b>	1.239	F	0.230	1.239	F	0.230	
46	Crenshaw Boulevard/ Pincay Drive-90th Street <sup>d</sup>	AM	0.646	B	0.675	B	0.729	C	0.054	0.729	C	0.054	0.814	D	0.139	0.714	C	0.039
	PM	0.728	C	0.760	C	0.782	C	-0.022	0.782	C	0.022	<b>1.024</b>	<b>F</b>	<b>0.264</b>	<b>0.924</b>	<b>E</b>	<b>0.164</b>	
	SAT	0.689	B	0.720	C	0.794	C	0.074	0.794	C	0.074	<b>1.154</b>	<b>F</b>	<b>0.434</b>	<b>0.933</b>	<b>E</b>	<b>0.213</b>	
47	Crenshaw Boulevard/ Century Boulevard <sup>d</sup>	AM	0.776	C	0.811	D	0.898	D	0.087	0.764	C	-0.047	0.881	D	0.070	0.881	D	0.070
	PM	1.004	F	1.051	F	1.067	F	0.016	0.896	D	-0.155	1.278	F	0.227	1.278	F	0.227	
	SAT	0.991	E	1.038	F	<b>1.160</b>	<b>F</b>	<b>0.122</b>	<b>0.953</b>	<b>E</b>	<b>0.085</b>	1.522	F	0.484	1.522	F	0.484	
48	Crenshaw Boulevard/ Imperial Highway <sup>d</sup>	AM	0.806	D	0.842	D	0.867	D	0.025	0.867	D	0.025	0.915	E	0.073	0.815	D	-0.027
	PM	0.844	D	0.882	D	0.891	D	0.009	0.891	D	0.009	<b>1.071</b>	<b>F</b>	<b>0.189</b>	<b>0.971</b>	<b>E</b>	<b>0.089</b>	
	SAT	0.736	C	0.769	C	0.780	C	0.011	0.780	C	0.011	<b>1.002</b>	<b>F</b>	<b>0.233</b>	<b>0.902</b>	<b>E</b>	<b>0.133</b>	

**Table VI.E-12 (Continued)**  
**Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -**  
**AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
49	Crenshaw Boulevard/ Shopping Center Driveway (s/o Imperial Highway) <sup>d</sup>	AM	0.390	A	0.405	A	0.429	A	0.024	0.429	A	0.024	0.449	A	0.044	0.449	A	0.044
	PM	0.477	A	0.496	A	0.529	A	0.033	0.529	A	0.033	0.598	A	0.102	0.598	A	0.102	
	SAT	0.474	A	0.493	A	0.479	A	-0.014	0.479	A	-0.014	0.574	A	0.081	0.574	A	0.081	
50	Crenshaw Boulevard/ 116th Street <sup>d</sup>	AM	0.543	A	0.566	A	0.591	A	0.025	0.591	A	0.025	0.610	B	0.044	0.610	B	0.044
	PM	0.570	A	0.594	A	0.601	B	0.007	0.601	B	0.007	0.669	B	0.075	0.669	B	0.075	
	SAT	0.643	B	0.671	B	0.694	B	0.023	0.694	B	0.023	0.782	C	0.111	0.782	C	0.111	
51	Crenshaw Boulevard/ 118th Place-I-105 Freeway WB Ramps <sup>d</sup>	AM	0.739	C	0.772	C	0.797	C	0.025	0.797	C	0.025	0.827	D	0.055	0.827	D	0.055
	PM	0.763	C	0.798	C	0.764	C	-0.034	0.764	C	-0.034	0.860	D	0.062	0.860	D	0.062	
	SAT	0.720	C	0.753	C	0.766	C	0.013	0.766	C	0.013	0.887	D	0.134	0.887	D	0.134	
52	I-105 Freeway EB Ramps/ 120th Street <sup>e</sup>	AM	0.908	E	0.950	E	0.965	E	0.015	0.965	E	0.015	0.978	E	0.028	0.978	E	0.028
	PM	0.759	C	0.794	C	0.694	B	-0.100	0.694	B	-0.100	0.730	C	-0.064	0.730	C	-0.064	
	SAT	0.676	B	0.706	C	0.721	C	0.015	0.721	C	0.015	0.766	C	0.060	0.766	C	0.060	
53	Crenshaw Boulevard/ 120th Street <sup>e</sup>	AM	0.796	C	0.832	D	0.873	D	0.041	0.873	D	0.041	0.894	D	0.062	0.894	D	0.062
	PM	0.723	C	0.755	C	0.744	C	-0.011	0.744	C	-0.011	0.793	C	0.038	0.793	C	0.038	
	SAT	0.795	C	0.831	D	0.862	D	0.031	0.862	D	0.031	0.975	E	0.144	0.975	E	0.144	
54	Western Avenue/ Manchester Avenue <sup>b</sup>	AM	0.781	C	0.817	D	0.830	D	0.013	0.830	D	0.013	0.909	E	0.092	0.909	E	0.092
	PM	0.775	C	0.810	D	0.780	C	-0.030	0.780	C	-0.030	0.914	E	0.104	0.914	E	0.104	
	SAT	0.778	C	0.813	D	0.843	D	0.030	0.843	D	0.030	0.992	E	0.179	0.992	E	0.179	
55	Western Avenue/ Century Boulevard <sup>b</sup>	AM	0.760	C	0.794	C	0.816	D	0.022	0.816	D	0.022	0.908	E	0.114	0.838	D	0.044
	PM	0.778	C	0.814	D	0.870	D	0.056	0.870	D	0.056	<b>1.029</b>	<b>F</b>	<b>0.215</b>	<b>0.959</b>	<b>E</b>	<b>0.145</b>	
	SAT	0.692	B	0.723	C	0.765	C	0.042	0.765	C	0.042	0.958	E	0.235	0.888	D	0.165	
56	Vermont Avenue/ Manchester Avenue <sup>b</sup>	AM	0.864	D	0.903	E	0.915	E	0.012	0.915	E	0.012	<b>1.057</b>	<b>F</b>	<b>0.154</b>	<b>0.904</b>	<b>E</b>	<b>0.001</b>
	PM	0.919	E	0.962	E	0.987	E	0.025	0.987	E	0.025	<b>1.176</b>	<b>F</b>	<b>0.214</b>	<b>0.985</b>	<b>E</b>	<b>0.023</b>	
	SAT	0.674	B	0.704	C	0.737	C	0.033	0.737	C	0.033	0.872	D	0.168	0.623	B	-0.081	

**Table VI.E-12 (Continued)**  
**Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -**  
**AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
57	Vermont Avenue/ Century Boulevard <sup>b</sup>	AM	0.652	B	0.681	B	0.695	B	0.014	0.695	B	0.014	0.772	C	0.091	0.772	C	0.091
	PM	0.691	B	0.721	C	0.709	C	-0.012	0.709	C	-0.012	0.863	D	0.142	0.863	D	0.142	
	SAT	0.623	B	0.650	B	0.672	B	0.022	0.672	B	0.022	0.830	D	0.180	0.830	D	0.180	
58	Figueroa Street/ Manchester Avenue <sup>b</sup>	AM	0.762	C	0.800	C	0.808	D	0.008	0.808	D	0.008	0.892	D	0.092	0.892	D	0.092
	PM	0.711	C	0.746	C	0.708	C	-0.038	0.708	C	-0.038	0.845	D	0.099	0.845	D	0.099	
	SAT	0.762	C	0.800	C	0.792	C	-0.008	0.792	C	-0.008	0.929	E	0.129	0.929	E	0.129	
59	I-110 Freeway SB Ramps/Manchester Avenue <sup>b</sup>	AM	0.631	B	0.662	B	0.669	B	0.007	0.669	B	0.007	0.699	B	0.037	0.699	B	0.037
	PM	0.549	A	0.576	A	0.561	A	-0.015	0.561	A	-0.015	0.676	B	0.100	0.676	B	0.100	
	SAT	0.519	A	0.544	A	0.567	A	0.023	0.567	A	0.023	0.669	B	0.125	0.669	B	0.125	
60	I-110 Freeway NB Ramps/Manchester Avenue <sup>b</sup>	AM	0.743	C	0.780	C	0.781	C	0.001	0.781	C	0.001	0.842	D	0.062	0.842	D	0.062
	PM	0.596	A	0.625	B	0.631	B	0.006	0.631	B	0.006	0.688	B	0.063	0.688	B	0.063	
	SAT	0.584	A	0.613	B	0.604	B	-0.009	0.604	B	-0.009	0.673	B	0.060	0.673	B	0.060	
61	Figueroa Street/ Century Boulevard <sup>b</sup>	AM	0.771	C	0.806	D	0.813	D	0.007	0.813	D	0.007	0.891	D	0.085	0.891	D	0.085
	PM	0.717	C	0.749	C	0.741	C	-0.008	0.741	C	-0.008	0.850	D	0.101	0.850	D	0.101	
	SAT	0.711	C	0.742	C	0.771	C	0.029	0.771	C	0.029	0.968	E	0.226	0.968	E	0.226	
62	I-110 Freeway SB Off Ramp-Grand Avenue/Century Boulevard <sup>b</sup>	AM	0.447	A	0.465	A	0.480	A	0.015	0.480	A	0.015	0.559	A	0.094	0.559	A	0.094
	PM	0.521	A	0.543	A	0.554	A	0.011	0.554	A	0.011	0.702	C	0.159	0.702	C	0.159	
	SAT	0.532	A	0.555	A	0.584	A	0.029	0.584	A	0.029	0.769	C	0.214	0.769	C	0.214	
63	I-110 Freeway NB On Ramp-Olive Street/Century Boulevard <sup>b</sup>	AM	0.569	A	0.593	A	0.609	B	0.016	0.609	B	0.016	0.689	B	0.096	0.689	B	0.096
	PM	0.487	A	0.507	A	0.529	A	0.022	0.529	A	0.022	0.701	C	0.194	0.701	C	0.194	
	SAT	0.575	A	0.600	A	0.640	B	0.040	0.640	B	0.040	0.859	D	0.259	0.859	D	0.259	
64	Crenshaw Boulevard/ 104th Street <sup>d</sup>	AM	0.674	B	0.704	C	0.733	C	0.029	0.733	C	0.029	0.753	C	0.049	0.753	C	0.049
	PM	0.645	B	0.674	B	0.699	B	0.025	0.699	B	0.025	0.778	C	0.104	0.778	C	0.104	
	SAT	0.575	A	0.600	A	0.631	B	0.031	0.631	B	0.031	0.733	C	0.133	0.733	C	0.133	



**Table VI.E-12 (Continued)**  
**Alternative RU 3,500 Project Summary of Volume to Capacity Ratios and Levels of Service -**  
**AM and PM Weekday Peak Hours and Saturday Mid-Day Peak Hour**

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ ALT RU 3500 PROJECT		CHANGE V/C	YEAR 2014 W/ ALT RU 3500 MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	V/C	LOS	V/C	V/C	LOS	V/C	LOS			
65	New Signalized Project Driveway/Century Boulevard <sup>b</sup>	AM	f	f	f	f	0.496	A	0.496	0.496	A	0.496	0.562	A	0.562	0.562	A	0.562
		PM	f	f	f	f	0.690	B	0.690	0.690	B	0.690	0.895	D	0.895	0.895	D	0.895
		SAT	f	f	f	f	0.694	B	0.694	0.694	B	0.694	0.983	E	0.983	0.983	E	0.983
66	Prairie Avenue/97 <sup>th</sup> Street <sup>d</sup>	AM	0.371	A	0.385	A	0.427	A	0.042	0.427	A	0.042	0.448	A	0.063	0.448	A	0.063
		PM	0.487	A	0.507	A	0.530	A	0.023	0.530	A	0.023	0.610	B	0.103	0.610	B	0.103
		SAT	0.449	A	0.467	A	0.542	A	0.075	0.542	A	0.075	0.639	B	0.172	0.639	B	0.172

*Notes: Significant impacts are denoted with shaded cells and bold numbers.*

- <sup>a</sup> City of Culver City Intersection.
- <sup>b</sup> City of Los Angeles Intersection.
- <sup>c</sup> County of Los Angeles Intersection.
- <sup>d</sup> City of Inglewood Intersection.
- <sup>e</sup> City of Hawthorne Intersection.
- <sup>f</sup> Future Intersection.

Source: Linscott, Law and Greenspan Engineers, August 1, 2008.

mitigation measures recommended for the Proposed Project and the related projects are anticipated to reduce the cumulative impacts to less than significant levels at 23 of the 27 study intersections. Additional mitigation measures beyond those identified for the Proposed Project and related projects will be necessary in order to mitigate the cumulative impacts due to the Alternative RU 3,500 project and the related projects to less than significant levels at the following intersections:

5. La Tijera Boulevard/Centinela Avenue;
12. La Cienega Boulevard/Century Boulevard;
21. La Brea Avenue/Arbor Vitae Street; and
39. Yukon Avenue-Gate 5/Century Boulevard.

The following paragraphs summarize the recommended additional transportation mitigation measures for the study intersections to mitigate the cumulative traffic impacts due to the Alternative RU 3,500 project and the related projects to less than significant levels:

- Int. No. 5: La Tijera Boulevard/Centinela Avenue (City of Los Angeles)

In addition to the cumulative mitigation identified in the traffic study for the proposed project and related projects, it is proposed that the westbound approach on Centinela Avenue at La Tijera Boulevard be modified to provide one additional through lane. The resultant westbound approach lane configuration would provide one left-turn lane, two through lanes, and one shared through/right-turn lane through the intersection. As shown in Table VI.E-12, these mitigation measures would reduce the forecast cumulative impact at this intersection to less than significant levels.

- Int. No. 12: La Cienega Boulevard/Century Boulevard (City of Los Angeles)

In addition to the cumulative mitigation identified in the traffic study for the proposed project and related projects, it is proposed that the northbound approach on La Cienega Boulevard at Century Boulevard be modified to provide one additional through lane. The resultant northbound approach lane configuration would provide one left-turn lane, two through lanes, one shared through/right-turn lane, and one right-turn only lane through the intersection. It should be noted that there are three existing departure lanes on La Cienega Boulevard north of Century Boulevard. As shown in Table VI.E-12, these mitigation measures would reduce the forecast cumulative impact at this intersection to less than significant levels.

- Int. No. 21: La Brea Avenue/Arbor Vitae Street (City of Inglewood)

This intersection is anticipated to be cumulatively impacted by the Alternative RU 3,500 project and the related projects. The recommended cumulative mitigation consists of the funding

contribution to develop and enhance the City of Inglewood ITS program at this intersection. As shown in Table VI.E-12, this mitigation measure would reduce the forecast cumulative impact at this intersection to less than significant levels.

- Int. No. 39: Yukon Avenue-Gate 5/Century Boulevard (City of Inglewood)

In addition to the cumulative mitigation identified in the traffic study for the proposed project and related projects, it is proposed that the existing traffic signal be modified to provide a southbound right-turn overlapping phase to be operated concurrently during the eastbound left-turn phase. As shown in Table VI.E-12, these mitigation measures would reduce the forecast cumulative impacts at this intersection to less than significant levels.

### **Parking**

Impacts on parking from the Proposed Project would be less than significant. Like the Proposed Project, the parking demands for Alternative RU 3,500 will be met through use of the Hollywood Park Specific Plan. Alternative RU 3,500 would generate more parking demand related to the additional residential units to be constructed on-site, but would generate slightly less demand in the Mixed-Use Zone because 50,000 sf less of office/commercial spaces would be developed. This Alternative would be subject to the same shared parking analysis as required under the Proposed Project to ensure the parking supply is adequate to support the proposed development in the mixed-use area. Therefore, Alternative RU 3,500 would result in a less than significant impact to parking.

### **Conclusion**

Alternative RU 3,500 would not reduce any environmental impacts of the Proposed Project. Specifically, this Alternative would not reduce the following significant and unavoidable impacts associated with the Proposed Project: Air Quality (construction and operation), Noise (construction), Population, Housing and Employment (Population growth forecasts and Housing Growth Forecast), and solid waste (operation). Additionally, Alternative RU 3,500 would result in an additional significant and unavoidable impact resulting from operational noise as a result of additional mobile sources on-site.

As described in Table VI.E-13, below, Alternative RU 3,500 would achieve all of the Project Objectives to approximately the same degree as the Proposed Project.

**Table VI.E-13  
Assessment of Alternative RU 3,500 to Meet the Project Objectives**

<b>Project Objectives</b>	<b>Assessment of the Alternative to Meet Objectives</b>
1. To contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space.	Alternative RU 3,500 would be consistent with this project objective, as this alternative would include the same types of uses as included for the Proposed Project.
2. To provide an economically viable project that promotes the City’s economic well-being by significantly increasing property and sales tax revenues and providing high-quality retail uses and the opportunity for transient occupancy tax.	Alternative RU 3,500 would be consistent with this project objective, as this alternative would include the same types of uses as included for the Proposed Project.
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.	Alternative RU 3,500 would be consistent with this project objective, as the Casino and Gambling facility would continue to operate.
4. To provide land for a civic/public use.	Alternative RU 3,500 would meet this objective as it would include four acres for civic/public use.
5. To create exciting community park and open space areas, that exceed the City’s existing General Plan goals of one acre per 1,000 residents, in a manner that meets the needs of the proposed development and is beneficial to the overall community.	Alternative RU 3,500 would meet this objective as it would include 25-acres of open space. Based on the goal of one acre per 1,000 persons, this alternative would generate a need for approximately 10.5 acres of open space. Therefore, this alternative would provide approximately 14.5 acres above the goal.
6. To add a variety of ownership-housing opportunities, of different product types and prices, in an area of the greater Los Angeles region that is job-rich, thus creating a better balance of housing and employment opportunities.	Alternative RU 3,500 would meet this objective as it would include 3,500 dwelling units that would vary in size and price to accommodate the demands of the region.
7. To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood.	Alternative RU 3,500 would meet this objective as it would include 620,000 sf of retail uses and 25,000 sf of office uses.
8. To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and public open space within portions of the Merged Redevelopment Project Area.	Alternative RU 3,500 would meet this objective as it would include redevelopment of the Project Site and would provide a similar development scenario as the Proposed Project that would include open space features and improved landscape elements as compared to the existing conditions.
9. To create safe, secure and defensible spaces through project design, while also allowing public spaces, such as parks and retail, to be open to the public.	Alternative RU 3,500 would meet this objective as it would include the development of 25-acres of open space, 620,000 sf of retail, and 4-acres of civic use. Additionally, this alternative would include a police substation similar to the Proposed Project.
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project.	Alternative RU 3,500 would meet this objective as it would include the same types of project design features that are included under the Proposed Project to help increase sustainability with respect to water use, wastewater generation, energy demand, solid waste generation and more.
11. To promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways in a mixed-use project which integrates housing with employment opportunities.	Alternative RU 3,500 would meet this objective as it would include similar characteristics as compared to the Proposed Project and would include a similar circulation and pedestrian plan that would promote walking and bicycle use.

<b>Project Objectives</b>	<b>Assessment of the Alternative to Meet Objectives</b>
12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities.	Alternative RU 3,500 would meet this objective as it would include similar characteristics as compared to the Proposed Project and would include a similar pedestrian-oriented environment with comparable streetscape amenities as the Proposed Project.
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.	Alternative RU 3,500 would meet this objective as it would include similar visual characteristics and landscape features as compared to the Proposed Project.

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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

### F. MAXIMUM HOUSING ALTERNATIVE

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This Alternative was selected as a possible scenario for future development to incorporate the creation of both on-site and off-site affordable housing into the overall project, and to maximize the development of overall housing. No specific affordable housing is created as a result of the Proposed Project. Rather, the creation of new affordable housing is left to future implementation by the Redevelopment Agency, in accordance with the existing Redevelopment Plan for the Merged In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century and Imperial-Prairie Redevelopment Project Areas (the “Merged Redevelopment Plan”). The Project, as proposed, indirectly funds the creation of affordable housing by generating additional tax increment for the Redevelopment Agency to increase and improve the supply of affordable housing for persons and families of very low and moderate income.

Under this Alternative, the developer would be involved in creating affordable dwelling units as part of the project. This Alternative analyzes a range of potential options for accomplishing the creation of the 15% affordable units set forth in the Merged Redevelopment Plan. In accordance with Redevelopment Law, 40% of the affordable dwelling units would be created for persons and families with very low income, and 60% would be created for persons and families with moderate income, as defined in Community Redevelopment Law, Health and Safety Code, Section 33000 *et seq.* The affordable dwelling units could be located: 1) on the Project Site, 2) off the Project Site, but within the In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century and Imperial-Prairie Redevelopment Project Areas (each, a “Constituent Redevelopment Project Area,” or collectively, the “Merged Redevelopment Project Area”), or 3) a combination of on the Project Site and off the Project Site, but within the Merged Redevelopment Project Area. If the affordable dwelling units are aggregated in the Merged Redevelopment Project Area, the Redevelopment Agency must find that to do so will not cause or exacerbate racial, ethnic, or economic segregation. If the affordable dwelling units are created outside of the Merged Redevelopment Project Area, two affordable dwelling units will be required for each unit that otherwise would have been required to be available inside the Merged Redevelopment Project Area.

The Maximum Housing Alternative would result in the development of a maximum of 3,500 dwelling units on the Project Site, a maximum of 525 affordable dwelling units off the Project Site, approximately 620,000 sf of retail use, approximately 120,000 sf of casino use, a 300-room hotel with 20,000 sf of meeting room space, approximately 25,000 sf of office space, approximately 25 acres of open space, and approximately 10,000 sf of community space. A four-acre site would also be made available for civic uses which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility. Although a certain amount of affordable dwelling units may be created on the Project Site, for the purposes of studying the environmental impacts of this Alternative, a “worst-case scenario” is assumed, which provides for 3,500 market rate units on the Project Site and 525 affordable units off the Project Site. This provides a maximum envelope of potential impact to permit the lead agency wide latitude in determining how much affordable housing to be included specifically within

this Project, and where such housing could or should be located. All affordable dwelling units are expected to be “for rent,” including any affordable units that may be built on the Project Site.

There are a variety of methods that could be used to create the affordable dwelling units, including, but not limited to: (1) new construction on the Project Site; (2) new construction off the Project Site; (3) rehabilitation of old, existing units within the Merged Redevelopment Project Area; (4) purchasing or acquiring long-term affordability covenants on existing multifamily units within the Merged Redevelopment Project Area that restrict the cost of renting or purchasing those units that either: (i) are not presently available at affordable housing cost to persons and families of low or very low income households; or (ii) are units that are presently available at affordable housing costs to this same group of persons or families, but the that the Redevelopment Agency finds cannot reasonably be expected to remain affordable to this same group of persons or families; or (5) any other method permitted by law.

As compared to the Proposed Project, this Alternative could result in an increase of 1,030 dwelling units, and a reduction of 50,000 sf of commercial office space. The Equivalency Program could not be utilized under this Alternative to maximize the number of dwelling units constructed on-site in excess of 3,500 units. The proposed circulation plan and landscaping features, including the lake would be similar to what is proposed under the Proposed Project. A summary of the planned development under this Alternative is provided in Table VI.F-1, below.

**Table VI.F-1  
Development Summary of Maximum Housing Alternative**

<b>PROPOSED DEVELOPMENT</b>	<b>FLOOR AREA (NET)<sup>[a]</sup></b>
Residential (on the Project Site)	3,500 du (maximum)
Residential (off the Project Site)	525 du (maximum)
Retail	620,000 sf
Casino	120,000 sf
Civic Use	4 Acres <sup>[b]</sup>
Hotel	300 rooms / 20,000 sf meeting space
Office	25,000 sf
Open Space	25 AC
Community Space (HOA Recreation Facility)	10,000 sf
<b>Notes</b>	
<sup>[a]</sup> The use of net floor area is calculated per the Inglewood Municipal Code for purposes of determining the developed floor area. All floor area values are expressed in square feet (sf).	
<sup>[b]</sup> For purposes of analyzing the most environmentally intensive development of a civic use, this use was assumed to include the development of a school use with up to 800 students or a public library, depending on the impact being analyzed. For those impacts where a school produces greater impacts, a school was assumed. In all other cases, a public library was assumed as the use on the civic site.	
Source: Hollywood Park Land Company, July 2008.	

## *Aesthetics*

### *Views and Urban Design*

Impacts on views and urban design under the Proposed Project would be less than significant. Under the Maximum Housing Alternative, the Project Site would be redeveloped in a manner that is substantially comparable to the Proposed Project in terms of visual character and views. While the density of the project would be slightly increased if 3,500 dwelling units are built on-site, the urban design and mix of land uses would be substantially the same. To the extent the affordable dwelling units are new construction off-site, there would not be significant impacts to visual character and views since the units will be located in an already built-out, urbanized area and would be constructed and designed to be compatible with the surrounding uses. To the extent the affordable dwelling units are created via rehabilitation of older, existing buildings, there would not be a not be a significant impact to visual character and views since the affordable dwelling units created will be in existing dwelling units in the Merged Redevelopment Project Area. And, in most cases, the rehabilitation of older buildings results in improved visual character to the site and surrounding area. Impacts to views and urban design under this Alternative would be less than significant.

### *Light and Glare*

Impacts on light and glare under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, the Maximum Housing Alternative would generate new sources of light and glare in the form of street lighting, signage illumination and structural light illumination. To the extent the affordable units are new construction off-site, new sources of light and glare in the form of structural light illumination could occur, although the dwelling units would be designed to include directional and security lighting in a manner to reduce light and glare impacts on adjacent uses to the maximum extent feasible. To the extent affordable dwelling units are created via rehabilitation located off the Project Site, the off-site affordable units would not generate new sources of light and glare since the units already exist within a developed community and the redevelopment of the potential sites would occur in urbanized areas and would be designed to include directional and security lighting in a manner to reduce light glare impacts upon adjacent uses to the maximum extent feasible. As compared to the existing environment, the Maximum Housing Alternative would eliminate a substantial amount of light pollution that is currently generated by evening events at the racetrack. Accordingly, light and glare impacts under this Alternative would be less than significant.

### *Shade and Shadow*

The Proposed Project would result in a less than significant impact with respect to shade and shadow. The Maximum Housing Alternative would also be developed with most structures at or below 75 feet in height. Similar to the Proposed Project, this Alternative would include the 300-room hotel structure and it would be the tallest structure at approximately 150 feet above grade. To the extent that affordable units are new construction off-site, it is possible that the new structures could shade sensitive uses. The extent



of the shade and shadow impacts from new construction off-site cannot be determined until specific sites are selected for the affordable dwelling units. To the extent the affordable units are created via rehabilitation of older, existing buildings, no new shade and shadow impacts would be anticipated since the units would be located in already existing structures. As concluded for the Proposed Project, shade and shadow impacts from the development would not significantly impact sensitive land uses. Therefore, the Maximum Housing Alternative would be developed at the same scale and massing as the Proposed Project, and this Alternative would also result in less than significant shade and shadow impacts.

## **Air Quality**

### *Construction*

Constructed-related impacts on air quality under the Proposed Project would be significant and unavoidable. The Maximum Housing Alternative would require more construction activity than the Proposed Project due to the additional 505 dwelling units on the Project Site and the construction activity from the potential rehabilitation or new construction of 525 dwelling units off-site to create the affordable dwelling units. To the extent the affordable units are new construction off-site, the total pollutant emissions during the Maximum Housing Alternative construction period would be greater than pollutants emitted during the Proposed Project construction period. Completion of all affordable dwelling units could extend beyond 2014, thus air quality impacts from construction could endure longer than the timeline for the Proposed Project. To assume a worst-case impact, the development of the additional 505 dwelling units on the Project Site plus the 525 affordable units that could be developed off-site would result in 34% increase in residential construction as compared to the Proposed Project. As such, construction-related air quality impacts would be expected to increase proportionally at 34% above project emission levels for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> and would result in a significant and unavoidable air quality impact. Additionally, the Maximum Housing Alternative daily regional construction emissions would occur over a longer construction period than the Proposed Project and the duration of construction would be increased. To the extent the affordable units are created via rehabilitation of older, existing buildings, a significant unavoidable impact would still occur, although the rehabilitation of 525 units may result in decreased air quality impacts from construction, since less demolition and construction activity would be required as compared to the construction of 525 new affordable units. The overall impact of the alternative would nonetheless result in a significant and unavoidable impact. Therefore, the Maximum Housing Alternative would result in significant and unavoidable air quality impacts.

### *Operational*

The 1,030 additional dwelling units associated with the Maximum Housing Alternative would generate more mobile and area source emissions than the Proposed Project. Weekday emissions would be approximately 380 ppd for VOC, 260 ppd for NO<sub>x</sub>, 1,743 ppd for CO, two ppd for SO<sub>x</sub>, 70 ppd for PM<sub>2.5</sub>, and 358 ppd for PM<sub>10</sub>. Weekend emissions would be approximately 419 ppd for VOC, 338 ppd for NO<sub>x</sub>, 2,366 ppd for CO, three ppd for SO<sub>x</sub>, 96 ppd for PM<sub>2.5</sub>, and 490 ppd for PM<sub>10</sub>. Similar to the Proposed

Project, regional operational emissions would exceed the SCAQMD significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub>. As such, the Maximum Housing Alternative regional operational emissions would result in a significant and unavoidable impact.

Mobile source emissions associated with the Maximum Housing Alternative would potentially increase localized CO emissions. Project-related one- and eight-hour CO concentrations were 3.2 and 2.2 ppm, respectively. These concentrations are well below the State one- and eight-hour standards of 9.0 and 20 ppm, respectively. The increase of 505 affordable dwelling units on the Project Site and the 525 affordable dwelling units off the Project Site would increase traffic in the vicinity of the Project Site. However, it is not expected these increases associated with the Maximum Housing Alternative would increase the CO concentrations beyond the threshold one- and eight-hour concentration levels. As such, the Maximum Housing Alternative would result in a less than significant localized CO impact.

Similar to the Proposed Project, the Maximum Housing Alternative would not be consistent with the current General Plan land use designation, which was utilized to calculate the regional emissions budget in the most recent AQMP. As such, the Maximum Housing Alternative would not be compatible with the AQMP. And, with respect to cumulative impacts, the Maximum Housing Alternative would result in a net increase in housing and thus generate more greenhouse gas (GHG) emissions than estimated for the Proposed Project. It should be noted that while this Alternative could result in an increased amount of new residential development, to the extent affordable units are created via rehabilitation of older, existing buildings, this Alternative would increase the useful life of existing buildings and also involve the rehabilitation of older residences which would result in improved sustainability of those units as compared to their existing conditions. These features would include improved insulation, use of low-flow faucets and toilets, and energy star appliances. To the extent the affordable units are new construction, sustainability features would also be incorporated in these units. Additionally, the Maximum Housing Alternative would be typical of redevelopment in an urban environment and would not generate a disproportionate amount of vehicle miles traveled, and would not have unique and disproportionately high fuel consumption characteristics since this Alternative creates more infill housing close to jobs. Therefore, the Maximum Housing Alternative would result in a less than significant global warming impact.

## **Geology and Soils**

Impacts on geology and soils under the Proposed Project would be less than significant after mitigation. The same geological conditions and associated seismic risks would occur under the Maximum Housing Alternative as described for the Proposed Project. Development of the Proposed Project has been determined to be generally feasible from a geotechnical perspective. The geotechnical recommendations associated with the Project Site preparation, earthwork and foundations and Restricted Use Zone (RUZ) that are identified in the EIR for the Proposed Project would carry over to this Alternative for on-site development. With respect to the affordable dwelling units potentially created off-site whether through new construction or rehabilitation of older, existing buildings, the geological conditions and associated seismic risks would be analyzed once the precise location of the affordable units is determined. In the

absence of site specific geotechnical investigations, it is assumed that each potential development site would be subject to a geotechnical survey and investigation to ensure the site(s) are suitable from a geotechnical perspective as part of the building permit process on a case-by-case basis.

The geology and soils impacts under the Maximum Housing Alternative would therefore be less than significant.

### **Hazardous Materials and Risk of Upset**

#### *Construction*

Construction impacts on hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, this Alternative would result in the demolition of most of the existing uses on the Project Site and would generate potentially significant impacts associated with potential exposure to ACMs and LBP during construction. To the extent that the affordable units are developed off-site via new construction, the potential exposure to ACMs or LBP would depend upon whether the site is vacant or contains structures to be demolished. To the extent that the affordable units are created via rehabilitation of older, existing dwelling units, the rehabilitation process may generate potentially significant impacts associated with potential exposure to ACMs and LBP in older buildings. Similar to the Project, however, these impacts would be mitigated to less-than-significant levels with adherence to all applicable laws and regulations, and with respect to the on-site development, implementation of the mitigation measures prescribed for the Proposed Project. Therefore, the Maximum Housing Alternative would have a less than significant impact with respect to hazardous materials during construction.

#### *Operation*

Operational impacts with respect to hazardous materials and risk of upset under the Proposed Project would be less than significant after mitigation. Under the Maximum Housing Alternative, the retail, office, casino, hotel, school and residential uses would not require or generate substantial hazardous materials, which would be similar to the land uses developed under the Proposed Project. To the extent that affordable units are created off-site via new construction or rehabilitation of older, existing buildings, the residential units would not require or generate substantial hazardous materials. Therefore, this Alternative would have a less than significant impact after mitigation with respect to hazardous materials during operation.

### **Cultural Resources**

#### *Archeological Resources*

A cultural resources records search was conducted for the Hollywood Park Redevelopment Project Property by the South Central Coastal Information Center, California Historical Resources Information System in July 2007. Based on a review of all recorded archaeological sites within a ½-mile radius of the

Project Site and cultural resource reports on file, database records for all California Points of Historical Interest, California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places, and the California Historical Resources Inventory listings, no significant cultural resources are known to be located on the Project Site. Additionally, prior to construction or rehabilitation for any the affordable housing units located off the Project Site, each potential affordable housing site would be required to conduct site-specific research regarding cultural resources and any necessary mitigation would be assigned on a site-by-site basis to ensure impacts would be reduced to the maximum extent feasible. Therefore, the Maximum Housing Alternative would result in a less than significant impact on cultural resources. Additionally, this Alternative would include mitigation measures to ensure the impacts associated with the accidental discovery of unknown cultural resources would be less than significant.

#### *Historic Resources*

Impacts on historic resources under the Proposed Project would be less than significant after mitigation. Similar to the Proposed Project, this Alternative would involve the demolition of most of the existing buildings on the Project Site and the construction of a new mixed-used development. Through a comprehensive historic resource analysis (refer to Section IV.E, Cultural Resources), which included a field investigation of the Project Site and surrounding area, review of building permit records, maps, books and photographs, it was determined, by an evaluation of criteria used by the California Register of Historical Resources, that none of the buildings currently existing on the Project Site are considered significant historic resources pursuant to CEQA. Additionally, impacts, if any, to historic resources from the creation of affordable dwelling units off-site, whether through new construction or rehabilitation, will be addressed on a site-by-site basis and proper mitigation measures will be implemented, if applicable. As such, the Maximum Housing Alternative would result in less than significant impacts on historic resources.

#### **Hydrology/Water Quality**

##### *Construction*

Construction-related impacts on water quality under the Proposed Project would be less than significant after mitigation. Under the Maximum Housing Alternative, water quality impacts would be slightly increased but similar to the Proposed Project. The redevelopment of the site at a higher density would generate more cars and activities with an inherent increased potential to impair the surface water flows during storm events. Additionally, this Alternative could also result in the construction and/or rehabilitation of affordable housing units off the Project Site which would result in additional disturbed surface area during construction activities. Implementation of prescribed best management practices and compliance with the RWQCB regulations on and off the Project Site would reduce potentially significant water quality impacts to less than significant levels. Therefore, the Maximum Housing Alternative would result in less than significant impacts after mitigation on hydrology/water quality.

### *Operational*

Operational impacts to water quality under the Proposed Project would be less than significant after mitigation. Under the Maximum Housing Alternative, the amount of pervious surface area on the Project Site would be approximately the same as the Proposed Project since this Alternative would include all 25 acres of open space and is appropriately designed to retain and treat surface water flows on site with controlled release into the receiving storm drains. Additionally, this Alternative could also result in the operation of affordable housing units off the Project Site which would also be designed to retain and treat surface water flows on-site at each respective location, with controlled release into the receiving storm drains. Therefore, the Maximum Housing Alternative would result in less than significant impacts after mitigation with respect to operational hydrology/water quality.

### **Noise**

#### *Construction*

Under the Proposed Project, mitigated construction noise levels would exceed the five dBA significance threshold at sensitive receptors near the Project Site. As such, construction activity would result in a significant and unavoidable short-term construction noise impact. Construction activity associated with the Maximum Housing Alternative for the Project Site would generally result in similar noise levels as discussed for the Proposed Project. For the off-site development, construction-related noise exposure would be expected to reach similar levels as compared to the Proposed Project, but would be more dispersed throughout the City since the 525 affordable units would be created off-site. If noise level increases from construction would occur in proximity to noise sensitive uses, mitigation measures would be required to reduce noise levels to the maximum extent feasible. Construction activity on and off the Project Site would comply with the standards established in the Noise Ordinance. Nevertheless, short-term construction-related noise impacts associated with the Maximum Housing Alternative would result in a significant and unavoidable impact after mitigation.

#### *Operational*

Operational impacts on noise under the Proposed Project would be less than significant after mitigation. The Maximum Housing Alternative would result in more daily vehicle trips to the Project Site than the Proposed Project due to the increased residential component and therefore would result in higher mobile noise levels. Mobile noise resulting from vehicle trips to the affordable dwelling units that could be located off-site would be essentially equivalent to the existing conditions for rehabilitated dwelling units since the units already exist and generate a certain amount of trips; however, for newly constructed affordable units, mobile noise resulting from vehicle trips would be an increase over existing conditions. Mobile noise associated with the Maximum Housing Alternative may result in noise level increases greater than three decibels within the “normally unacceptable” or “clearly unacceptable” category, resulting in a significant and unavoidable impact. Therefore, the Maximum Housing Alternative would result in a significant and unavoidable operational noise impact due to mobile sources.

Stationary noise sources associated with Maximum Housing Alternative for the additional development on the Project Site would be similar to those sources identified for the Proposed Project. To the extent affordable units are created off-site via new construction, potential stationary noise sources, including mechanical equipment, for the new buildings could be located near other residences and could cause an increase in ambient noise levels. However, it is anticipated that the increase in ambient noise levels would be less than the three dBA audibility threshold, because the mechanical equipment could generally be located within enclosures or otherwise shielded from any nearby sensitive land uses. To the extent the affordable units are created off-site via rehabilitation of older existing buildings, the baseline ambient noise level from stationary noise sources could be maintained, or even improved upon because of the rehabilitation of the building. As such, stationary noise under the Maximum Housing Alternative would result in a less than significant impact.

And, similar to the Proposed Project, all residential units constructed under this Alternative (including newly constructed or rehabilitated affordable housing located off-site) would be designed to maintain noise levels at interior spaces to be within the 45 dBA noise standard. In addition, any proposed residential uses that fall within the Los Angeles International Airport Influence Area's 65 dBA CNEL contour would be required to be developed in a manner that achieves a 45 dBA interior noise level. With respect to affordable units created via rehabilitation of older, existing buildings, this could be an improvement over current conditions to the extent that buildings being rehabilitated fall within the 65 dB CNEL noise contour and are not currently providing a 45 dB CNEL interior noise level.

### **Population, Housing, and Employment**

Impacts on population, housing and employment under the Proposed Project would be significant and unavoidable due to a technical inconsistency with regional housing and population growth forecasts.

### ***Construction Impacts***

The Proposed Project would generate approximately 17,105 construction-related jobs over the 10-year buildout and stabilization horizon period. It is estimated that employment opportunities associated with construction of the improvements and structures on the Project Site and the rehabilitation of existing dwelling units or construction of new off-site units for affordable housing under the Maximum Housing Alternative would be similar to Alternative RU 3,500 which would generate approximately 18,821 construction-related jobs. This increase in construction jobs would be considered a beneficial impact of this Alternative and would not indirectly create an increase in the City's population or the need for housing. Indirect impacts upon regional population, housing and employment conditions would be less than significant under this Alternative.

Construction impacts to population and housing can sometimes cause displacement. If the affordable dwelling units created off-site result from new construction, there would not be a displacement impact since the new units would be constructed on currently vacant land. However, if the creation of 525 off-site affordable dwelling units is achieved by rehabilitating of older, existing buildings, the creation of the

affordable units could lead to housing displacement impacts. The significance of this impact cannot be determined without knowing the specific sites for the location of the affordable housing. However, to the extent feasible, rehabilitation would be completed in a manner that is consistent with normal attrition within the units and relocation assistance would be provided in accordance with all applicable federal, state, and local housing regulations. Under this Alternative, the change to housing would result in a net increase of affordable housing units, which would be beneficial in terms of meeting the City's affordable housing goals.

### ***Operational Impacts***

#### *Employment Displacement Impacts*

Similar to the Proposed Project, the Maximum Housing Alternative would eliminate horse racing at the Hollywood Park Racetrack. Therefore, operational employment displacement impacts for this Alternative would be less than significant, like the Proposed Project.

#### *Employment Generation Impacts*

#### Indirect Employment Growth

The increase in on-site employment generated by the commercial uses of this Alternative 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. The increase in on-site employment opportunities generated by the commercial uses of this Alternative would generate less indirect population and housing growth than anticipated under the Proposed Project. This Alternative includes the same amount of retail space, but includes a reduction of 50,000 sf of office space. Employment opportunities typically associated with commercial and retail uses would not likely result in substantial permanent population growth or associated housing demands. Indirect impacts to population and housing demographics generated by the commercial uses of this Alternative would be less than significant.

#### Direct Employment Growth

Under the Maximum Housing Alternative, the proposed commercial and residential land uses on the Project Site are estimated to generate approximately 3,094 jobs, including the retention of approximately 1,071 existing casino-related jobs. Although this Alternative would result in the displacement of the 1,601 FTE jobs that are currently generated by the current horseracing operations on the property, this Alternative would result in a net increase of 476 new jobs overall. As compared to the Proposed Project, which would generate approximately 517 new jobs, the level of employment generated by this Alternative would be slightly less. Nevertheless, as this Alternative would still generate a net positive amount of jobs, and employment impacts from direct employment growth would be considered less than significant.

## *Population/Housing Impacts*

### Regional Housing Growth Forecasts

The Maximum Housing Alternative could involve the construction of 3,500 new dwelling units on the Project Site resulting in the generation of 10,500 new residents to the City of Inglewood. In addition, this Alternative could result in the development of 525 affordable dwelling units off-site within the Merged Redevelopment Project Area. In the event the affordable housing is developed with new housing off-site, assuming 3.0 persons per dwelling unit, this Alternative could generate up to 1,575 additional residents for a total of 12,075 new residents. However, this represents a worst-case scenario as some of the off-site affordable housing could involve rehabilitation of existing residential units. Under this scenario, the potential for population growth would be off-set by the existing residents in the buildings. As such, the net gain in resident population would be in the range of 10,500 to 12,075 additional residents. As compared to the Proposed Project, which would create approximately 2,995 new residential dwelling units resulting in approximately 8,985 new permanent residents, this Alternative would increase housing and population estimates by up to 3,090 new residents.

With respect to housing, the 2,995 dwelling units included for the Proposed Project would be inconsistent with the housing identified for the City of Inglewood. The SCAG housing forecasts for Inglewood for the year 2015 is estimated at 38,149 dwelling units. The construction of the 2,995 dwelling units under the Proposed Project would therefore result in a total of 41,964 dwelling units by 2014. Accordingly, under the Proposed Project, the 2015 housing forecast would not be within SCAG's estimate by 3,815 dwelling units. As the Maximum Housing Alternative would include an increase of up to 505 additional dwelling units on-site and up to 525 affordable dwelling units off-site as compared to the Proposed Project, this Alternative would exceed SCAG's 2015 housing forecast by approximately 4,845 dwelling units. However, it should be noted that creating affordable housing furthers the goals of the Inglewood General Plan, the Merged Redevelopment Plan and the RHNA because there is a shortage of affordable housing in the planning area. Furthermore, this Alternative would add more housing in an area with policies geared to increase housing stock, both affordable and market rate, and can be accommodated by existing utilities, public services, and roadway infrastructure without resulting in significant environmental impacts. However, like 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 a significant and unavoidable impact.

### Regional Population Growth Forecasts

With respect to population, the 2,995 dwelling units included for the Proposed Project would result in approximately 8,985 new permanent residents. This increase would not be consistent with the population growth forecast identified for the City of Inglewood. The SCAG population forecasts for the Inglewood Subregion for the year 2015 is estimated at 120,185 persons. The construction of the 2,995 dwelling units under the Proposed Project would result in a new population of approximately 127,863 persons by 2014. Accordingly, under the Proposed Project, the 2014 population would exceed SCAG's 2015 forecast by



7,678 persons. As the Maximum Housing Alternative would include an increase of up to 3,090 persons as compared to the Proposed Project, this Alternative would exceed SCAG's 2015 housing forecast by approximately 10,768 persons. Accordingly, this impact would be technically significant and unavoidable. However, as noted above, since there is a shortage of housing in the City, the creation of up to 525 affordable units may not in reality generate new residents to the City; it is possible that the units will be filled by current City residents. Additionally, since the Project Site and any off-site development would be considered infill development, this Alternative creates development in areas that are already accommodated by existing utilities, public services and roadway infrastructure without resulting in additional significant environmental impacts. Additionally, as discussed under the Proposed Project's impacts, 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—June 30, 2014 planning period. The creation of additional housing by this Alternative, both affordable and market-rate, 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. Nonetheless, this impact would be considered significant and unavoidable since it exceeds the population growth forecasts for the City.

### **Land Use and Planning**

The Maximum Housing Alternative would include generally the same mix of land uses on the Project Site as included under the Proposed Project. In addition, this Alternative contemplates the potential development of off-site affordable dwelling units. Similar to the Proposed Project, the Maximum Housing Alternative would require an amendment to the General Plan and the Merged Redevelopment Plan, adoption of a Specific Plan, and a zone change to achieve consistency with the City's land use planning policies. To the extent that there is off-site creation of affordable dwelling units, the units are expected to be developed in areas where residential units are currently allowed by the IMC and General Plan and Redevelopment Plan designations. Until specific sites are selected, the full impacts with regard to these land uses are not known. With approval of the discretionary requests for the Project Site, land use consistency impacts under this Alternative would be less than significant. In the event the construction of affordable housing involves additional discretionary requests that are not identified and evaluated within the scope of this EIR, further CEQA review would be required.

### **Public Utilities**

With the exception of solid waste, impacts on public utilities under the Proposed Project would be considered less than significant. For purposes of a "worst-case" analysis, all of the 525 affordable housing units that could be created through new construction or rehabilitation of existing units off the Project Site are assumed to be new construction in order to forecast this Alternative's "worst-case" impact.

## Water

As shown in Table VI.F-2, below, assuming all 525 affordable housing units are created via new construction off-site, the Maximum Housing Alternative would generate a demand for 797,335 gallons per day or approximately 996.57 AF/yr. Comparing the water demand estimated in the 2005 Urban Water Management Plan (which accounted for some level of development on the Hollywood Park Site in addition to the Renaissance and Haagan projects) to the proposed water demands for the Maximum Housing Alternative yields the amount of water not accounted for in the 2005 Urban Water Management Plan for the Maximum Housing Alternative of the Hollywood Park Redevelopment Project. Mathematically, this is shown as 29.53 AF/yr [H] + 46.76 AF/yr [R] – 359.96 AF/yr [EHP] + 996.57 AF/yr [HPRP] = 712.9 AF/yr.

**Table VI.F-2  
Water Demands Under the Maximum Housing Alternative**

Project Land Use	Quantity	Unit	Demand Factor		Total (GPD)
<b>DOMESTIC WATER</b>					
Mixed Use (R-M)	4.45	AC	5,210	GPD/AC <sup>1</sup>	23,185
Residential SFD (R-1)	35	DU	336	GPD/DU <sup>1</sup>	11,760
Residential—Affordable Off-Site <sup>4</sup>	525	DU	336	GPD/DU	176,400
Residential SFD (R-1.5, R-2, R-2A)	16.35	AC	1,926	GPD/AC <sup>1</sup>	31,490
Residential TH (R-3)	71.36	AC	5,210	GPD/AC <sup>1</sup>	371,786
Residential WRAP/PODUIM (R-4, R-M)	35.07	AC	5,210	GPD/AC <sup>1</sup>	182,715
<b>Subtotal Residential =</b>					<b>797,335</b>
Commercial/Retail	36.36	AC	1,680	GPD/AC <sup>1</sup>	61,085
Hotel	4.95	AC	1,680	GPD/AC <sup>1</sup>	8,316
Casino/OTB	5.64	AC	1,680	GPD/AC <sup>1</sup>	9,475
Civic Use	4	AC	1,680	GPD/AC <sup>1</sup>	6,720
Lake Water Replenishment	4	AC	1,540	GPD/AC <sup>2</sup>	6,161
<b>TOTAL DOMESTIC USES =</b>					<b>889,092</b>
<b>RECYCLED WATER</b>					
Parks (Recycled Water)	13	AC	3,445	GPD/AC <sup>3</sup>	44,785
Public Streets (Recycled Water)	9.93	AC	3,445	GPD/AC <sup>3</sup>	34,195
Private HOA Open Space	20.38	AC	3,445	GPD/AC <sup>3</sup>	70,209
<b>TOTAL RECYCLED WATER USES =</b>					<b>149,189</b>
<sup>1</sup> Table 1-2, City of Inglewood 25 Year Water Master Plan dated September 2003. <sup>2</sup> Geosyntec Water Balance Report. <sup>3</sup> 3.86 acre-feet/year per acre irrigation demand. Based on information from the California Irrigation Management Information System. <sup>4</sup> The generation rates provided in the WSA are generally based upon the acreage of the applicable land use. For comparison purposes, this analysis assumes a “worst case” scenario and uses the generation rate for SFD R-1 to estimate the water demanded by 525 affordable units off-site, since the acreage of the affordable units is unknown at this time. It is anticipated that the affordable units would actually use less water than the SFD R-1 units since the affordable units would be for-rent apartments. Source: Hollywood Park Redevelopment Project Water Demands, Letter Report, Stetson Engineers, Inc., July 17, 2008.					

Since the 2005 Urban Water Management Plan attributed 360.60 AF/yr the three development projects, the Maximum Housing Alternative would leave a deficit of a maximum of 353 AF/vr. At a minimum, this Alternative would be responsible for securing water sources up to this amount.

It is anticipated that like Alternative RU 3,500 there would be a deficit of water supply in the later years (2025 and/or 2030) for the normal water years and the multiple dry water year's scenarios resulting from the increased water demand associated with the implementation of this Alternative. The deficits under the Maximum Housing Alternative are higher than those shown for the Proposed Project. This is to be expected because the water demand for the Maximum Housing Alternative could include up to 525 affordable housing units off-site and an additional 505 dwelling units on-site.

Should the Maximum Housing Alternative be phased in over time, water demand impacts would be phased in as well. But ultimately, the full effect of the water demand impacts will be realized upon complete implementation of the project. It should be noted that to the extent the affordable dwelling units are created through rehabilitation of older, existing buildings, the impacts to water demand would be less than estimated since water is currently demanded by those existing units and is being serviced by current water supply. Ordinance No. 170,978 would still apply to the Maximum Housing Alternative, resulting in increased water conservation measures. Mitigation measures that are proposed for the Project are also required for the Maximum Housing Alternative to secure water rights for the projected deficit, and the Alternative would impose conservation measures similar to those that would be imposed during dry or multiple dry years. Under Mitigation Measure J.1-1, the Project Applicant would provide the precise amount of water that would ultimately be required for the Alternative once more information is known about the actual water needs of the affordable housing units. As discussed in the Water Supply Assessment, the water supply deficit generated by the Maximum Housing Alternative can be made up with ground water leases and the acquisition of water rights. Therefore, water supply impacts will be reduced to a less than significant level.

### *Wastewater*

As shown in Table VI.F-3 below, the Maximum Housing Alternative would generate a net increase of approximately 589,000 gpd of wastewater. In comparison to the Proposed Project, which is anticipated to generate 393,000 net gpd of wastewater, this Alternative would generate approximately 196,000 gpd more than estimated to be generated by the Proposed Project. Similar to the Proposed Project, it is expected that the existing wastewater infrastructure would be sufficient to handle the increased demands from this Alternative. Therefore, the Maximum Housing Alternative would result in less than significant impacts.

**Table VI.F-3  
Estimated Wastewater Generation by Maximum Housing Alternative**

Land Use	Unit/Quantity	Generation Rate (gpd/unit) <sup>a</sup>	Total (gallons/day)
<b>Existing Uses<sup>b</sup></b>	--	--	524,000
<i>Subtotal Existing:</i>			
<b>Maximum Housing Alternative</b>			
Residential	3,500 du	200 gal/unit/day	700,000
Affordable Residential on/off Site	525	200gal/unit/day	105,000
Retail	620,000 sf	0.325 gal/sf/day	201,500
Casino	120,000 sf	0.35 gal/sf/day	42,000
Civic Use	4 Acres <sup>c</sup>	20 gal/student/day	16,000
Hotel (rooms)	300 rooms	125 gal/room/day	37,500
Hotel (meeting space)	20,000 sf	0.3 gal/sf/day	6,000
Office	25,000 sf	0.2 gal/sf/day	5,000
Open Space	25 AC	--	--
Community Space (HOA Recreation Facility)	10,000 sf		--
<i>Subtotal Alternative</i>	-	-	<b>1,113,000</b>
<b>Total Net Water Demand</b>			<b>589,000</b>
<i>Notes:</i>			
<i>du: Dwelling units</i>			
<i>sf: Square feet</i>			
<i><sup>a</sup> Generation Rates based on County Sanitation Districts of Los Angeles County wastewater generation rates. Uses not listed are estimated by the closest type of use available in the table.</i>			
<i><sup>b</sup> Hall and Foreman, EIR Technical Appendix - Public Utilities Report, May 2008.</i>			
<i><sup>c</sup> For purposes of analyzing the most environmentally intensive development of a civic use, this use was assumed to include the development of a school use with up to 800 students.</i>			
<i>Source: Christopher A. Joseph &amp; Associates, July 2008.</i>			

### **Energy Conservation**

#### *Electricity*

As shown in Table VI.F-4, the Maximum Housing Alternative would consume a net increase of 12,729,889 kilowatt hours per year (KW-Hr/yr) of electricity as compared to existing conditions. In comparison to the Proposed Project, this Alternative would result in a net increased demand of approximately 5,893,045 KW-Hr/yr of electricity per year. Similar to the Proposed Project, it is expected that existing electrical facilities would be sufficient to handle the increased loads of the Maximum Housing Alternative. Therefore, this Alternative would result in less than significant impacts on electricity demands.

**Table VI.F-4  
Estimated Electricity Demands – Maximum Housing Alternative**

<b>Land Use</b>	<b>Size (SF)</b>	<b>Demand (Kilowatt hours/unit/year)<sup>a</sup></b>	<b>Total (kilowatt hours/year)</b>
Existing Uses <sup>b</sup>	--		26,010,004
<i>Subtotal Existing</i>	-	-	
<b><i>Maximum Housing Alternative</i></b>			
Residential	3,500	5,626.50 KW-Hr/unit	19,692,750
HOA Facility	10,000 sf	10.5 KW-Hr/sf/yr	105,000
Affordable Residential on/off Site	525	5,626.50 KW-Hr/unit	2,953,913
Retail	675,000 sf	13.55 KW-Hr/sf/yr	9,146,250
Casino/OTB	120,000 sf	19.23 KW-Hr/sf/yr <sup>c</sup>	2,307,930
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	10.5 KW-Hr/sf/yr	772,800
Hotel			
300 Rooms <sup>f</sup>	210,000 sf	9.95 KW-Hr/sf/yr	2,089,500
Meeting Space	20,000 sf	12.95 KW-Hr/sf/yr	259,000
Office	25,000 sf	12.95 KW-Hr/sf/yr	323,750
Open Space	25 AC	1 KW-Hr/sf/yr	1,089,000
<i>Subtotal Alternative</i>	-	-	<b>38,739,893</b>
<b>Total Net Electricity Demand</b>			<b>12,729,889</b>
<i>Notes:</i>			
<i>du: dwelling unit</i>			
<i>sf: square feet</i>			
<sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise.			
<sup>b</sup> Hollywood Park Land Company, June 8, 2007.			
<sup>c</sup> The electricity generation rate was based on existing electricity demands for the casino as provided by the Hollywood Park Land Company.			
<sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use.			
<sup>e</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil).			
<sup>f</sup> Hotel use based on 700 square feet per room.			
Source: Christopher A. Joseph & Associates, July 2008.			

### Natural Gas

Under the Maximum Housing Alternative, an increase in approximately 3,500 new dwelling units and rehabilitation or construction of 525 dwelling units off-site for affordable housing would further increase demands for natural gas resources. As shown in Table VI.F-5, the Maximum Housing Alternative would generate a demand for a net increase in 26,674,925 cubic feet of natural gas per month as compared to existing conditions. In comparison to the Proposed Project, this Alternative would result in an increased consumption of approximately 6,764,950 cubic feet of natural gas per month.

**Table VI.F-5  
Estimated Natural Gas Consumption – Maximum Housing Alternative**

<b>Land Use</b>	<b>Unit/Quantity</b>	<b>Consumption Rate <sup>a</sup></b>	<b>Total</b>
Existing Uses <sup>b</sup>	--	--	3,894,900
<b><i>Maximum Housing Alternative</i></b>			
Residential	3,500 units	6,665 cf/du/month	23,327,500
HOA Facility	10,000 sf	2 cf/sf/month	20,000
Affordable Residential on/off Site	525 units	6,665 cf/du/month	3,499,125
Office/Commercial	25,000 sf	2 cf/sf/month	50,000
Retail	620,000 sf	3 cf/sf/month	1,860,000
Casino/OTB	120,000 sf	4.80cf/sf/month	576,000
Hotel			
Rooms-300 Rooms <sup>c</sup>	210,000 sf	5 cf/sf/month	1,050,000
Meeting Space	20,000 sf	2 cf/sf/month	40,000
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	2 cf/sf/month	147,200
Open Space	25 AC	--	--
<b>Subtotal</b>			<b>30,569,825</b>
<b>Net Total</b>			<b>26,674,925</b>
<sup>a</sup> Rates based on SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993, unless footnoted otherwise. <sup>b</sup> Hollywood Park Land Company, June 8, 2007. <sup>c</sup> Hotel use based on 700 square feet per room. <sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use for these impacts. <sup>e</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2008.			

Similar to the Proposed Project, it is expected that existing natural gas infrastructure would be sufficient to serve the needs of this Alternative. Therefore, while demands for natural gas would be increased as compared to the Proposed Project, impacts to natural gas infrastructure and supplies would be less than significant.

#### *Solid Waste*

Demolition activities under the Maximum Housing Alternative would involve approximately the same amount of demolition debris on the Project Site as the Proposed Project (i.e., 67,735 tons), since the same existing buildings would be removed from the Project Site under either scenario. In addition, an unknown quantity of demolition debris would result from rehabilitation if the affordable units are not new construction on vacant lots. This Alternative would also result in an increase of floor area on the Project Site and off-site dwelling units as compared to the Proposed Project; thus, the amount of construction

waste generated under the Maximum Housing Alternative would be more than the construction waste generated under the Proposed Project. As shown in Table VI.F-6, below, the portion of the on-site development of the Maximum Housing Alternative would generate approximately 67,735 tons of demolition debris and 16,722 tons of construction debris, for a total of 84,457 tons of debris. As compared to the Proposed Project, this Alternative would result in an increased generation of solid waste by approximately 3,035 tons.

**Table VI.F-6  
Estimated Construction Solid Waste Generation – Maximum Housing Alternative**

Construction Activity	Size (sf)	Rate (lbs./sf)	Generated Waste (tons)
<i>Demolition-Existing Uses</i>		<i>Subtotal</i>	<b>67,735</b>
<i>Construction-Maximum Housing Alternative</i>			
Residential <sup>a</sup>	3,500 units	4.38	11,498
HOA Facility	10,000 sf	3.89	19
Affordable Residential on/off Site	525 units	4.38	2,300
Office/Commercial	25,000 sf	3.89	49
Retail	620,000 sf	3.89	1,206
Casino/OTB	120,000 sf	17.67 <sup>b</sup>	1,060
Hotel			
Rooms	300 rooms <sup>c</sup>	3.89	408
Meeting Space	20,000 sf	3.89	39
Civic Use <sup>d</sup>	4 AC <sup>e</sup>	3.89	143
Open Space	25 acres	N/A	-
		<i>Subtotal</i>	<b>16,722</b>
		<b>Total</b>	<b>84,457</b>
<sup>a</sup> Assumes an average of 1,500 sf per dwelling unit. <sup>b</sup> Based on renovation rate provided in <i>Characterization of Building-Related Construction and Demolition Debris in the United States</i> , U.S. E.P.A., June, 1998. <sup>c</sup> Based on an average of 700 sf per hotel room. <sup>d</sup> The proposed Civic Use could consist of a school, library, community center or other civic use. For purposes of this EIR, generation rates for public utilities are based on a school use because it would be the most intensive civic use. <sup>e</sup> Based on California Department of Education, 2000, <i>Guide to School Site Analysis and Development</i> . A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, August 2008.			

While demands for solid waste disposal needs would be increased as compared to the Proposed Project, increased impacts to regional landfill capacity would be negligible as adequate landfill capacity is anticipated during the construction timeline of the proposed Alternative. Accordingly, the Maximum Housing Alternative would result in less than significant solid waste impacts during construction.

As shown in Table VI.F-7, net operational solid waste generation for the Maximum Housing Alternative would be approximately 16,076 tons of solid waste per day as compared to existing conditions. As compared to the Proposed Project, this Alternative would result in an increased generation of solid waste by approximately 3,820 pounds per day.

**Table IV.F-7  
Estimated Operational Solid Waste Generation by Maximum Housing Alternative**

Land Use	Unit/Quantity	Generation Rate <sup>a</sup> (lbs/unit/day)	Total
<b>Existing Uses</b>			
Main Building/Grandstand	594,000	.006	3,564
Casino <sup>b</sup>	321,000	.005	1,605
		<i>Subtotal</i>	<b>5,169</b>
<b>Maximum Housing Alternative</b>			
Residential	3,500 units	4.00 lbs/unit/day	14,000
HOA Facility	10,000 sf	0.006 lbs/sf/day	60
Affordable Residential on/off Site	525 units	4.00 lbs/unit/day	2,100
Office/Commercial	25,000 sf	0.006 lbs/sf/day	150
Retail	620,000 sf	0.005 lbs/sf/day	3,100
Casino/OTB	120,000 sf	0.005 lbs/sf/day	600
Hotel			
Rooms	300 rooms	2.0 lbs/room/day	600
Meeting Space	20,000 sf	0.006 lbs/sf/day	120
Civic Use <sup>c</sup>	4 AC	0.007 lbs/sf/day	515
Open Space	25 AC	--	--
		<i>Subtotal</i>	<b>21,245</b>
		<b>Net Total</b>	<b>16,076</b>
<sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table. <sup>b</sup> Does not include the Pavilion area which has been abandoned and is not in use. <sup>c</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2008.			

Operational-related solid waste impacts would be significant and unavoidable as regional landfill capacity for the life of the Alternative beyond 2015 has not been accommodated. Because solutions to meet future disposal needs have not yet been developed at the regional level (i.e., developing new landfills within the County and transporting waste outside the region) operational solid waste impacts would be significant and unavoidable on project-specific and cumulative level. Accordingly, the Maximum Housing Alternative would result in significant and unavoidable operational solid waste impacts.



## Public Services

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

### *Police Protection*

The projected demand for police protection services is based on the number and types of land uses and anticipated on-site population. Since this Alternative would result in the development of more residences on the Project Site and off-site, as compared to the Proposed Project, it would place an increased demand on the IPD for police protection services. Based on the number of sworn officers that are currently authorized for the IPD (i.e., 1.8 officers per 1,000 inhabitants), the Maximum Housing Alternative would generate a demand for 22 additional police officers, or roughly 6 more police officers than the Proposed Project. Similar to the Proposed Project, the Maximum Housing Alternative would generate tax revenue that the City could use to hire new officers. Additionally, this Alternative would incorporate mitigation measures to reduce the potential for increasing demands upon police services in the area, such as strategically positioned lighting, building security systems, and implementation of an on-site security plan. This Alternative would also include a police substation on the Project Site to be operated and staffed by the Inglewood Police Department. Therefore, the impact on police protection services under the Maximum Housing Alternative would be less than significant.

### *Fire Protection*

The projected demand for fire protection services is based on the amount and size of new structures on a site. Since this Alternative would result in an increase in the intensity of development on the Project Site as compared to the Proposed Project, it would place an increased demand on the LACoFD for fire protection services. To the extent affordable units are created off-site, there will also be an increased demand on the LACoFD if the affordable units are new construction; rehabilitation of older, existing units would not increase demand on fire protection services since these buildings are already served by the LACoFD. As discussed in Section IV.K.2, Fire Protection, fire flow requirements would be determined by the LACoFD. Overall, the impact on fire protection services under this Alternative would be less than significant.

### *Schools*

As shown in Table VI.F-8, below, the Maximum Housing Alternative would generate approximately 810 new students; approximately 236 more students than the Proposed Project. This assumes the most impactful scenario whereby 525 affordable units are created as a result of new construction off-site, which would generate new residents and thus new students not currently served by the IUSD. As discussed in Section IV.K.3, the Applicant and IUSD are discussing the possibility of a facility and financing program and mitigation agreement that would be mutually agreeable for all affected parties. Impacts associated with the increase in student enrollment at nearby schools resulting from the Proposed Project are being jointly evaluated. The Applicant will work with IUSD to ensure that any new school that could be

developed would be built in accordance with local and state standards and requirements and are available for all Project students. If no mitigation agreement is completed, the Applicant would be required to pay the adopted Developer Fees, which would fully and completely mitigate all school impacts. Therefore, this Alternative would result in a less than significant impact after mitigation on schools.

**Table VI.F-8  
Estimated Student Generation by Maximum Housing Alternative <sup>a</sup>**

Product Type	Student Projections			
	K-5	6-8	9-12	K-12
Single Family Detached	132	63	72	267
Single Family Attached	121	56	76	253
Multi-Family	140	78	71	290
<b>TOTAL</b>	<b>393</b>	<b>197</b>	<b>219</b>	<b>810</b>
<b>Classrooms <sup>b</sup></b>	<b>16</b>	<b>7</b>	<b>8</b>	<b>-</b>

<sup>a</sup> Includes the 525 off-site affordable units

<sup>b</sup> Classroom size is based on state standards of 25 students per elementary classroom and 27 students per middle and high school classrooms.

#### *Recreation and Parks*

Under the Proposed Project and this Alternative, the Project Applicant is proposing to provide 25-acres of open space that would be provided for community use. Based on the General Plan Open Space Element goal of one acre per 1,000 persons, this Alternative would generate a need for approximately 12 acres of open space. The Alternative would provide over 2 acres per 1,000 residents, and would thus provides an amount of parks and open space in excess of the General Plan goal. Therefore, under the Maximum Housing Alternative, impacts on recreation and parks would be less than significant.

#### *Libraries*

The Maximum Housing Alternative would generate up to approximately 12,075 new residents to the City of Inglewood, generating an increased demand for library services. Based on written correspondence from the IPL, the City's libraries are currently meeting the needs of the City, within the limits of existing funding levels. The Maximum Housing Alternative would generate tax revenue that the city could use to expand library services if needed. Additionally, this Alternative, like the Proposed Project, includes a 4-acre civic site which could be used as a joint use school, including a library that can be utilized by all city residents. Therefore, the Maximum Housing Alternative would also result in a less-than-significant impact to the Inglewood Library system, and this impact would be slightly increased as compared to the Proposed Project.

## **Traffic and Transportation**

Impacts on traffic and transportation under the Proposed Project would be less than significant after mitigation.

The Project Site access scheme under the Maximum Housing Alternative would be consistent with the Proposed Project (See pg. VI.L-25).

With respect to the traffic impacts from on-site development under the Maximum Housing Alternative, the impacts would be the same as those analyzed under Alternative RU 3,500. Please refer to the Traffic and Transportation analysis in Section VI.E for a complete discussion of traffic and transportation impacts that would also be associated with the Maximum Housing Alternative.

### *Traffic Impact Comparison*

#### *Maximum Housing Alternative Project Impact Analysis*

To the extent that affordable dwelling units are new construction off-site, traffic associated with the creation of those would be determined once the specific sites are selected in the Merged Redevelopment Project Area; at that time, the additional trips would be assigned to the local roadway system to determine the impacts. To the extent that affordable units are created via rehabilitation, it is assumed that there would be no additional traffic generated since the buildings are already existing and create a certain amount of traffic that would be in the City's baseline conditions (See pg. VI.E-25).

## **Parking**

Impacts on parking from the Proposed Project would be less than significant. Like the Proposed Project, the parking demands for the on-site development under the Maximum Housing Alternative will be met through use of the Hollywood Park Specific Plan. The Maximum Housing Alternative would generate more parking demand related to the additional residential units to be constructed on-site, but would generate slightly less demand in the Mixed-Use Zone because 50,000 sf less of office/commercial spaces would be developed. The Maximum Housing Alternative would be subject to the same shared parking analysis as required under the Proposed Project to ensure the parking supply is adequate to support the proposed development in the mixed-use zone on the Project Site. To the extent affordable units are new construction off-site, parking will be provided according to the requirements of the Inglewood Municipal Code. To the extent affordable units are rehabilitation of older, existing buildings, at least the same number of parking spaces will be provided as currently exists. Therefore, the Maximum Housing Alternative would result in a less than significant impact to parking.

**Conclusion**

The Maximum Housing Alternative would not reduce any environmental impacts as compared to the Proposed Project, and specifically, this Alternative would not reduce the following significant and unavoidable impacts associated with the Proposed Project: Air Quality (Construction and Operation), Noise(Construction), Population, Housing & Employment (Population growth forecasts and Housing growth forecasts), and Solid Waste (Operation). Additionally, the Maximum Housing Alternative would lead to an additional significant and unavoidable impact resulting from operational noise as a result of additional mobile sources on the Project Site.

As described in Table VI.F-9, below, the Maximum Housing Alternative would achieve all of the Project Objectives to approximately the same degree as the Proposed Project in addition to directly increasing the supply of affordable housing for persons and families of very low and moderate income levels.

**Table VI.F-9  
Assessment of Maximum Housing Alternative to Meet the Project Objectives**

Project Objectives	Assessment of the Alternative to Meet Objectives
1. To contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space;	The Maximum Housing Alternative would be consistent with this project objective, as this alternative would include the same types of uses as included for the Proposed Project. Additionally, creating affordable units on vacant lots or rehabilitating older, existing buildings will also provide “smart growth.”
2. To provide an economically viable project that promotes the City’s economic well-being by significantly increasing property and sales tax revenues and providing high-quality retail uses and the opportunity for transient occupancy tax;	The Maximum Housing Alternative would be consistent with this project objective, as this alternative would include the same types of uses as included for the Proposed Project.
3. To preserve the Casino/Gambling Facility on the Hollywood Park Site.	The Maximum Housing Alternative would be consistent with this project objective, as the Casino and Gambling facility would continue to operate.
4. To provide land for a civic/public use.	The Maximum Housing Alternative would meet this objective as it would include four acres for civic/public use.
5. To create exciting community park and open space areas, that exceed the City’s existing General Plan goals of one acre per 1,000 residents, in a manner that meets the needs of the proposed development and is beneficial to the overall community;	The Maximum Housing Alternative would meet this objective as it would include 25-acres of open space. Based on the goal of one acre per 1,000 persons, this alternative would generate a need for approximately 12 acres of open space. Therefore, this alternative would provide approximately 13 acres above the goal.
6. To add a variety of ownership-housing opportunities, of different product types and prices, in an area of the greater Los Angeles region that is job-rich, thus creating a better balance of housing and employment opportunities;	The Maximum Housing Alternative would meet this objective as it would include 3,500 dwelling units that would vary in size and price to accommodate the demands of the region. Additionally, affordable rental units would be made available to very low and moderate income persons and families.

Project Objectives	Assessment of the Alternative to Meet Objectives
7. To provide opportunities for viable retail and creative office space in a manner that is complimentary to the existing character of the adjoining residential neighborhood;	The Maximum Housing Alternative would meet this objective as it would include 620,000 sf of retail uses and 25,000 sf of office uses.
8. To eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities, retail and restaurant uses, and public open space within portions of the Merged Redevelopment Project Area;	The Maximum Housing Alternative would meet this objective as it would include redevelopment of the Project Site and would provide a similar development scenario as the Proposed Project that would include open space features and improved landscape elements as compared to the existing conditions. In addition, vacant lots could be used to construct affordable housing and/or older, existing buildings could be rehabilitated to provide affordable housing.
9. To create safe, secure and defensible spaces through project design, while also allowing public spaces, such as parks and retail, to be open to the public;	The Maximum Housing Alternative would meet this objective as it would include the development of 25-acres of open space, 620,000 sf of retail, and 4-acres of civic use. Additionally, this alternative would include a police substation similar to the Proposed Project.
10. To provide a state-of-the-art sustainability program to be incorporated into the buildout and operation of the Proposed Project;	The Maximum Housing Alternative would meet this objective as it would include the same types of project design features that are included under the Proposed Project to help increase sustainability with respect to water use, wastewater generation, energy demand, solid waste generation and more.
11. To promote walking and bicycle use through enhanced pedestrian connections and bicycle pathways in a mixed-use project which integrates housing with employment opportunities;	The Maximum Housing Alternative would meet this objective as it would include similar characteristics as compared to the Proposed Project and would include a similar circulation and pedestrian plan that would promote walking and bicycle use. Any affordable units that could be located off-site would already be connected to existing bicycle pathways and pedestrian connections that currently exist in Inglewood.
12. To promote a safe pedestrian-oriented environment by providing extensive streetscape amenities; and	The Maximum Housing Alternative would meet this objective as it would include similar characteristics as compared to the Proposed Project and would include a similar pedestrian-oriented environment on the Project Site with comparable streetscape amenities as the Proposed Project.
13. To enhance the visual appearance and appeal of the neighborhood by providing perimeter and interior landscaping.	The Maximum Housing Alternative would meet this objective as it would include similar visual characteristics and landscape features on the Project Site as compared to the Proposed Project.

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## VI. ALTERNATIVES TO THE PROPOSED PROJECT

### G. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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Section 15126.6 of the State CEQA Guidelines requires that an “environmentally superior” alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. As summarized in Table VI.G-1, Proposed Project and Project Alternatives Environmental Impact Comparison, the environmentally superior alternative would be the No Project Alternative - Continuation of Existing Land Uses. However, as required by CEQA, when the No Project Alternative is shown to be environmentally superior over the Proposed Project, an Alternative Environmentally Superior Project Alternative shall be identified. For purposes of this analysis, Alternative RU 1,000 is identified as the Environmentally Superior Alternative.

Although Alternative RU 1,000 does not meet all of the Proposed Project’s objectives, does not avoid the significant impacts of the Proposed Project, and results in an additional significant impact, it is nonetheless selected as the environmentally superior project because its impacts would be less as compared to the Proposed Project. Alternative RU 1,000 would help further the General Plan and Merged Redevelopment Plan goals, as it would add new dwelling units to the City’s housing stock and provide new recreation and open space for Inglewood in a manner that is complimentary to the existing character of the adjoining residential neighborhood. Since one of the City’s goals is revitalizing the housing stock, of the alternatives that contain a residential component, Alternative RU 1,000 generally lessens the impacts on a relative basis, because it is a less intensive development. As discussed in Section IV.H. Population, Housing and Employment, the existing level of dwelling units is inconsistent with SCAG’s regional growth projections for the City. Therefore, any redevelopment that contains a residential component would be incapable of avoiding the technical significant impact of the Project’s inconsistency with regional growth projections. Additionally, any new development would also be incapable of avoiding the significant cumulative impact to operational solid waste because a regional solution to landfill capacity in the future has not been developed at this point. It is also likely that construction activities for any type of redevelopment would also create a significant, but temporary noise impact, and thus only no development alternative would be capable of reducing this significant impact of the Project.

Alternative RU 1,000 does not maintain the current racing activities or the casino on the Project Site, and does not have a commercial or retail component to off-set the number of jobs lost. As a result, the analysis for Alternative RU 1,000 concludes that employment displacement is a significant impact. Notwithstanding this analysis, the loss of jobs could be considered an economic or social effect of a project, and under CEQA Guidelines (Section 15131), it would not be treated as a significant effect on the physical environment. Viewed in this light, Alternative RU 1,000 would not result in an additional significant impact and would therefore result in the same level of impacts as the Proposed Project. Given that Alternative RU 1,000 is a less intensive development scenario than the Proposed Project, it overall would likely lessen the intensity of the impacts as compared to the Proposed Project.

**Table VI.G-1  
Project Alternatives Environmental Impact Comparison**

Impact Area	Proposed Project	No Project Alternatives			Alternative RU 800	Alternative RU 1,000	Alternative RU 3,500	Maximum Housing Alternative
		Continuation of Existing Land Uses <sup>1</sup>	Reasonably Foreseeable Stadium Alternative	Reasonably Foreseeable Convention Center Alternative				
<b>Aesthetics</b>								
Views and Urban Design	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
Light/Glare	LTS	SU (+)	SU (+)	LTS	LTS	LTS	LTS	LTS
Shade/Shadow	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
<b>Air Quality</b>								
Construction	SU	NI (-)	SU	SU	SU	SU	SU	SU
Operational	SU	SU	SU	LTS	SU	SU	SU	SU
<b>Geology and Soils</b>	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
<b>Hazardous Materials/Risk of Upset</b>								
Construction	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS
Operation	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
<b>Cultural Resources</b>								
Archaeological Resources	LTS	NI (-)	LTS	LTS	LTS	LTS	LTS	LTS
Historic Resources	LTS	NI	LTS	LTS	LTS	LTS	LTS	LTS
<b>Hydrology/Water Quality</b>								
Construction	LTS	NI (-)	LTS	LTS	LTS	LTS	LTS	LTS
Operation	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
<b>Noise</b>								
Construction	SU	NI (-)	SU	SU	SU	SU	SU	SU
Operation	LTS	NI	SU (+)	LTS	LTS	LTS	SU	SU (+)
<b>Population, Housing &amp; Employment</b>								
Employment Displacement	LTS	SU (+) <sup>3</sup>	LTS	LTS	SU (+)	SU (+)	LTS	LTS
Employment Generation	LTS	NI	LTS	LTS	SU (+)	SU (+)	LTS	LTS
Population/Housing	SU	NI	SU	SU	SU	SU	SU	SU
<b>Land Use and Planning</b>	LTS	LTS	SU (+)	SU (+)	SU (+)	LTS	LTS	LTS
<b>Public Utilities</b>								
Water	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
Wastewater	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
Energy – Electricity	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
Energy – Natural Gas	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
Solid Waste	SU	SU	SU	SU	SU	SU	SU	SU

Impact Area	Proposed Project	No Project Alternatives			Alternative RU 800	Alternative RU 1,000	Alternative RU 3,500	Maximum Housing Alternative
		Continuation of Existing Land Uses <sup>1</sup>	Reasonably Foreseeable Stadium Alternative	Reasonably Foreseeable Convention Center Alternative				
<b>Public Services</b>								
Police	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
Fire	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
Schools	LTS	NI (-)	LTS	NI (-)	LTS	LTS	LTS	LTS
Recreation and Parks	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
Libraries	LTS	LTS	LTS	NI (-)	LTS	LTS	LTS	LTS
<b>Traffic and Transportation</b> (Intersection LOS)	LTS	LTS	LTS	LTS <sup>2</sup>	LTS <sup>2</sup>	LTS <sup>2</sup>	LTS	LTS
<b>Parking</b>	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
<p><i>Notes:</i>                      NI: No Impact                      LTS: Less-Than-Significant Impact.                      SU: Significant Unavoidable Impact.  <sup>1</sup> For comparative purposes, the impacts analysis analyzes "Continuation of Existing Land Uses" as if it were a stand-alone project and not the baseline conditions.  <sup>2</sup> Assumes funding for the same level of mitigation as the Proposed Project.  <sup>3</sup> Assumes that over the long run, due to the continued decline of the economic viability of horse racing, racing-related jobs on site could be lost.                      (+) Denotes the level of impact under the alternative would be increased as compared to the Proposed Project.                      (-) Denotes the level of impact under the alternative would be reduced as compared to the Proposed Project.                      Source: Christopher A. Joseph &amp; Associates, October 2008.</p>								



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## **Persons Consulted**

AT&T

Los Angeles Construction and Engineering  
100 W. Alondra Boulevard, Building A, Room 202  
Gardena, CA 90248

Manny Gaitan, Engineer

City of Inglewood Public Works Department

1 Manchester Boulevard  
Inglewood, CA 90301

Glen W.C. Kau, P.E., Public Works Director

County of Los Angeles Fire Department

Fire Prevention Engineering

5823 Rickenbacker Road

Commerce, CA 90040

E.C., Engineering Technician

County of Los Angeles Fire Department

1320 N. Eastern Avenue

Los Angeles, CA 90063-3294

John R. Todd, Chief, Forestry Division

County of Los Angeles Public Works Department

Hydraulic Analysis Unit

1000 S. Fremont Ave., Building A9-East

Alhambra, CA 91803

T.J. Moon

County Sanitation Districts of Los Angeles County

1955 Workman Mill Road

Whittier, CA 90601-1400

Stephen R. Maguin, Chief Engineer and General Manager

Inglewood Public Library

101 W. Manchester Boulevard

Inglewood, CA 90301

Michael L. Easley, Senior Administrative Analyst

Southern California Edison

P.O. Box 800

Rosemead, CA 91770

Vivian R. Parker, Service Planner

Southern California Gas Company

701 N. Bullis Road

Compton, CA 90224-9099

Seabron Ross, Pipeline Planning Assistant

West Basin Municipal Water District

17140 S. Avalon Boulevard, Suite 210

Carson, CA 90746-1296

Joe Walters, Recycled Water Project Manager

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**VII. BIBLIOGRAPHY**  
**B. PREPARERS OF THE EIR**

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**LEAD AGENCY**

City of Inglewood Planning and Building Department  
One Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301

Sheldon Curry, Assistant City Administrator for Development

Jesse Lewis, Director of Community Development

Baron McCoy, Director Inglewood Redevelopment Agency

Wanda Williams, Senior Planner

Silvia Baker, Planner

**PROJECT APPLICANT**

Hollywood Park Land Company, LLC  
c/o Wilson Meany Sullivan  
100 Wilshire Blvd., Suite 940  
Santa Monica, CA 90401  
(310) 382-9000

Chris Meany

Doug Moreland

Maya Ray

**APPLICANT'S LEGAL COUNSEL**

Gibson, Dunn & Crutcher LLP  
333 S. Grand Avenue  
Los Angeles, CA 90071  
(213) 229-7000

Amy Forbes, Partner

Shireen B. Rahnema, Associate

Erika Randall, Associate

## **TRAFFIC/TRANSPORTATION**

Linscott, Law & Greenspan  
234 E. Colorado Blvd., Suite 400  
Pasadena, CA 91101  
(626) 796-2322

David Shender, Principal  
Alfred Ying, Engineer  
Francesca Bravo, Engineer

## **AIR QUALITY AND NOISE**

Terry A. Hayes Associates, LLC  
8522 National Boulevard, Suite 102  
Culver City, CA 90232  
(310) 839-4200

Terry A. Hayes, Principal  
Sam Silverman, Senior Environmental Scientist

## **GEOTECHNICAL ENGINEERS**

Delta Group Consultants  
2291 W. 25<sup>th</sup> Street, Suite 105  
Torrance, CA 90501  
(310) 320-2118

Michael D. Reader, CEO  
Ying Liu, Senior Project Engineer

Geomatrix Consultants, Inc.  
2101 Webster Street, 12<sup>th</sup> Floor  
Oakland, CA 94612  
(510) 663-4100

John A. Egan, Principal Engineer and Vice President  
Robert H. Wright, Senior Engineering Geologist  
Frank H. Swan, Consulting Geologist

## **ENVIRONMENTAL ENGINEER**

Erler & Kalinowski, Inc.  
35 North Lake Avenue, Suite 705  
Pasadena, California 91101  
phone: (626) 432-5900 x 201  
cell: (310) 713-2103  
fax: (626) 432-5905

Jami Striegel Orloff, P.E.

## **HISTORIC CONSULTANT**

Page & Turnbull, Inc.  
1242 Kolle Avenue  
South Pasadena, CA 91030  
(323) 982-9550

John Lesak

## **HYDROLOGY**

Hall & Foreman, Inc.  
25152 Springfield Court, Suite 350  
Santa Clarita, CA 91355-1096  
(661) 284-7400

Henrik Nazarian, P.E.

## **WATER QUALITY**

Geosyntec Consultants  
55 SW Yamhill Street, Suite 200  
Portland, Oregon 97204  
(503) 222-9518

Aaron Poresky

## **PARKING CONSULTANT**

Walker Parking Consultants  
2250 Hollywood Way, Suite 303  
Burbank, California 91505

Ezra D. Kramer

## **ECONOMIC DEVELOPMENT CONSULTANT**

HR&A Advisors, Inc.  
2800 28<sup>th</sup> Street, Suite 325,  
Santa Monica, California 90405  
Paul J. Silvern, Partner

## **EIR CONSULTANT**

Christopher A. Joseph & Associates  
11849 W Olympic Boulevard, Suite 101  
Los Angeles, California 90064  
Chris Joseph, President  
Shane E. Parker, Vice-President/Principal  
Brett Pomeroy, Environmental Planner  
Peggy Malone-Brown, Environmental Planner  
Kathleen Beresh, Research Assistant  
Sherrie Cruz, Senior Graphics Specialist  
Chad Flynn, GIS Specialist  
Brittany Burkhead, Research Assistant  
Johnny Borrelli, Research Assistant



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## VII. BIBLIOGRAPHY

### C. ABBREVIATIONS AND ACRONYMS

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AB	Assembly Bill
AC	Asbestos Cement
ACM	Asbestos-Containing Materials
ADT	average daily trips
AFY	Acre Feet per Year
ALUC	Airport Land Use Commission
AQMP	Air Quality Management Plan
ASTM	American Society of Testing and Materials
ASTs	above-ground storage tanks
ATCS	Adaptive Traffic Control System
ATSAC	Automatic Traffic Surveillance and Control system
BANL	Base Ambient Noise Level
BAT	Best Available Technology Economically Achievable
BCT	Best Conventional Pollutant Control Technology
bgs	below ground surface
BMP	Best Management Practices
BTEX	benzene, toluene, ethylbenzene, and xylene compounds
C-R	Commercial and Recreation (zoning designation)
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFO	concentrated animal feeding operation
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education

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CDFG	California Department of Fish and Game
CDMG	California Division of Mines and Geology
CEC	California Energy Commission
CEQA	California Environmental Quality Act
cf	cubic feet
CFD	Community Facilities District
cfs	cubic feet per second
CH <sub>4</sub>	methane
CHL	California Historical Landmarks
CHPS	Collaborative for High Performance Schools
CLUP	Comprehensive Land Use Plan
CMA	Critical Movement Analysis
CMP	Congestion Management Program/Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
COD	chemical oxygen demand
COPCs	chemicals of potential concern
CPT	Cone Penetration Test
CPTED	Crime Prevention Through Environmental Design
CPU	Crime Prevention Unit
CR	California Register of Historic Resources
CTR	California Toxics Rule
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel/scale
DOGGR	(California Department of Conservation) Division of Oil, Gas, and Geothermal Resources
DTSC	Department of Toxic Substances Control

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du	dwelling unit
EB	eastbound
EIR	Environmental Impact Report
EKI	Erler & Kalinowski, Incorporated
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
°F	Fahrenheit
FAR	Floor Area Ratio
FER	Fault Evaluation Report
FHWA	Federal Highway Administration
FRA	Federal Railway Administration
FTA	Federal Transportation Administration
FTE	full time equivalent
gal	gallon
GHG	Greenhouse gas
GLA	gross leasable area
gpd	gallons per day
gpm	gallons per minute
HCD	California Department of Housing and Community Development
HI	Hazard Index
HID	High Intensity Discharge
HOA	Home Owners' Association
HPLC	Hollywood Park Land Company
Hr	Hour
HR&A	HR&A Advisors, Inc.
HRA	health risk assessment
HRI	California State Historic Resources Inventory
HVAC	Heating, Ventilation and Air Conditioning
ICU	Intersection Capacity Utilization

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IDOT	Inglewood Department of Transportation
IMC	Inglewood Municipal Code
IPD	Inglewood Police Department
IPM	Integrated Pest Management
ISD	Inglewood School District
ITE	Institute of Transportation Engineers
ITS	Intelligent Transportation System
IUSD	Inglewood Unified School District
JWPCTP	Joint Water Pollution Control Wastewater Treatment Plant
JWPCP	Joint Water Pollution Control Plant
kg	kilogram
KW	kilowatt
kWh	kilowatt hours
L	liter
LACoFD or LAFD	Los Angeles County Fire Department
LACFCD	Los Angeles County Department of Public Works Flood Control District
LACSD	Los Angeles County Sanitation District
LADPW	Los Angeles County Department of Public Works
LADWP	Los Angeles Department of Water and Power
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LAX	Los Angeles International Airport
LBP	Lead-based paint
lbs	pounds
LEED	Leadership in Energy and Environmental Design
L <sub>eq</sub>	Equivalent Noise Level
LLG	Linscott Law and Greenspan (Traffic Consultant)
LOS	Level of Service
LST	Localized Significance Threshold

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m <sup>3</sup>	cubic meter
MAP	Million Annual Passengers
MBAS	methylene blue activated substances
MBTU	million British thermal units
MEP (or msp)	Maximum Extent Practicable
MF	multi-family
mg	milligram
µg	microgram
µg/m <sup>3</sup>	micrograms per cubic meter
mgpd	millions of gallons per day
mi	miles
MLS	Major League Soccer
mph	miles per hour
MPN	Most Probable Number
MM	Mitigation Measures
MMRP	Mitigation Monitoring Report and Program
MOA	memorandum of agreement
MS4	municipal separate storm sewer systems
msl or MSL	mean sea level
MTA	Metropolitan Transportation Authority
MVA	megavolt amperes
NAAQS	National Ambient Air Quality Standards
NB	northbound
NIFZ	Newport Inglewood Fault Zone
N <sub>2</sub> O	nitrous oxide
NO	nitrogen oxide
NO <sub>2</sub>	nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation

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NOT	Notice of Termination
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NR	National Register of Historic Resources
O <sub>3</sub>	Ozone
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
P1, 2, 3 or 5	Parking Structure 1, 2, 3 or 5
P3	the Casino Garage
PAHs	polycyclic aromatic hydrocarbons
Pb	lead
PCBs	Polychlorinated biphenyls
PCE factor	passenger car equivalency factor
PCE	Perchloroethene; also known as Tetrachloroethene
PDF	Project Design Feature
PE	preferred emergency
PHI	Points of Historical Interest
PM	particulate matter
PM <sub>10</sub>	respirable particulate matter
PM <sub>2.5</sub>	Fine Particulate Matter
ppd	pounds per day
ppm	parts per million
ppmv	parts per million by volume
PPV	peak particle velocity
psi	pounds per square inch
PTA	Primary Trade Area
PUC	(California) Public Utilities Commission (also CPUC)
RAP	Recovery Action Program
RCPG	Regional Comprehensive Plan and Guide

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RD	Reporting District
RHNA	Regional Housing Needs Assessment
RMS	root mean square
ROG	reactive organic gases
RTP	Regional Transportation Plan
RUZ	Restricted Use Zone
RWQCB	Regional Water Quality Control Board
SB	southbound
SB 50	Senate Bill 50
SBCCOG	South Bay Cities Council of Governments
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCG	Southern California Gas Company
SCH	State Clearinghouse
SEMS	Standard Emergency Management System
sf	square feet
SFA	single-family attached
SFD	single-family detached
SFID	School Facility Improvement District
SFNA	School Facilities Needs Analysis
SGR	student generation rates
SHBC	State Historical Building Code
SLIC	Spills, Leaks, Investigations, and Cleanups
SMP	Soil Management Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
SONGS	San Onofre Nuclear Generating Station

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SPT	Standard Penetration Tests
SQMP	Stormwater Quality Management Program
SRRE	Source Reduction and Recycling Element
STA	Secondary Trade Area
STC	sound transmission class
SUSMP	Standard Urban Stormwater Mitigation Plan
SVE	soil vapor extraction
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resource Control Board
TAC	Toxic Air Contaminants
TAHA	Terry A. Hayes Associates LLC
TBA	tertiary butyl alcohol
TDM	Transportation Demand Management
TDS	Total dissolved solids
TI	Traffic Index
TIA	Traffic Impact Assessment
TIF	tax increment financing
TMDL	total maximum daily load
TN	total nitrogen
TOD	Transit Oriented Development
TP	total phosphorous
TPH	total petroleum hydrocarbons
TSS	total suspended solids
ULI	the Urban Land Institute
USEPA	United States Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
V/C	Volume-to-Capacity
VdB	Vibration decibels



VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compound
vph	vehicles per hour
WB	westbound
WBMWD	West Basin Municipal Water District
WDR	Waste Discharge Requirement Order
WSA	Water Supply Assessment
WBMWD	West Basin Municipal Water District
WQOs	water quality objectives
Yr	Year