Global: Geo discussion still missing from most Alts.

CHAPTER 6
Project Alternatives

6.1 Overview

This chapter presents the alternatives analysis for the Proposed Project on the Project Site as required by the California Environmental Quality Act (CEQA). The discussion includes an explanation of the methodology used to select alternatives to the Proposed Project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the Proposed Project while still meeting most of the basic project objectives (as described in Chapter 2, Project Description). The chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated for their comparative merits with respect to minimizing adverse environmental effects. It describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration and reasons for their elimination. For the alternatives selected for analysis, the chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the Proposed Project. Finally, as required under CEQA Guidelines section 15126.6(e), based on this analysis, this chapter then discusses the Environmentally Superior Alternative.

6.1.1 CEQA Requirements for Alternatives Analysis

CEQA, the CEQA Guidelines, and the case law on the subject have established a comprehensive framework for the identification and analysis of alternatives to the Proposed Project in an EIR. CEQA Guidelines section 15126.6(a) states that an EIR must describe and evaluate a reasonable range of alternatives to the Proposed Project that would feasibly attain most of the project's basic objectives, but that would avoid or substantially lessen any identified significant adverse environmental effects of the project. An EIR is not required to consider every conceivable alternative to a Proposed Project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

Under CEQA, the feasibility of alternatives can be based on a range of factors and influences. CEQA Guidelines section 15364 defines "feasibility" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." CEQA Guidelines section 15126.6(f)(1) states that the factors that may be taken into account when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a

comparative environmental effects of development of the Proposed Project at three alternative locations in the region, including another site in the City of Inglewood.

Comparative Analysis of Environmental Effects

Table 6-2 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the Proposed Project and Alternative 1. Because no new development would occur at the Project Site, the effects of the No Project Alternative would be a continuation of the existing conditions described in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. Because the Proposed Project would not be constructed or operated at the Project Site under this alternative, none of the impacts identified for the Proposed Project would occur under the No Project alternative.

The Arena Site contains two developed parcels that are currently unoccupied. One unoccupied building is a two-story warehouse/light manufacturing facility located on the north side of West 102nd Street. The other unoccupied building is a one- and two-story concrete commercial building with an access driveway and small parking area located at 3838 West 102nd Street. Under Alternative 1, it is foreseeable that these buildings would be leased to new tenants, and warehouse/ light industrial/commercial activities in those buildings would resume. These activities would foreseeably be similar in nature and scope to those activities that have occurred in the past.

The effects of continued use of Staples Center for LA Clippers games would continue to create a range of environmental effects in and around downtown Los Angeles and the region, including the generation of vehicle miles travel (VMT) and associated congestion during pre- and post-event hours, and generation of criteria air pollutants including ozone precursors and small particulate matter. Because these effects are ongoing, they are considered part of the regional environmental setting and would not be subject to mitigation through the CEQA process.

Relationship to Project Objectives

Under the No Project Alternative none of the City's or applicant's objectives for the Proposed Project would be achieved.

6.5.2 Alternative 2: Reduced Project Size Alternative

Description

Under Alternative 2, the Proposed Project would be reduced in size to the maximum extent potentially feasible so as to avoid or substantially lessen impacts that would be associated with the intensity of development on the Project Site. Alternative 2 examines the impacts of a project that would still provide an arena sized consistent with the smallest recently-constructed NBA arenas, while eliminating all other uses that are not absolutely essential to the construction and operation of the arena itself. In this fashion, Alternative 2 would eliminate all uses other than the arena itself, the plaza that supports arena entry and exit, and the infrastructure (primarily parking) necessary to serve the arena. Further downsizing the arena is considered infeasible because an

Public Services

Because impacts of the Proposed Project on public services, including fire and police protection, and parks and recreation facilities would be largely driven by event activity at the proposed arena, these impacts would remain largely unchanged and would continue to be less than significant (see Impacts 3.13-1 through 3.13-10), under Alternative 2.

Transportation and Circulation

Under Alternative 2, the slightly reduced capacity of the arena would reduce vehicle trip generation in the pre-event and post-event peak hours for major events in the weekday and weekend evenings by approximately 3 percent. This slight reduction in trips would not materially reduce the significant impacts found for the Proposed Project on intersections, neighborhood streets, and freeway facilities under either Adjusted Baseline or Cumulative conditions with or without concurrent events at The Forum or the NFL Stadium (Impacts 3.14-1 through 3.14-9, Impacts 3.14-17 through 3.14-25, Impacts 3.14-33 through 3.14-35, and Impacts 3.14-42 through 3.14-44).

Global: these impacts don't line up anymore w/ 3.14.

Similar to the Proposed Project, Alternative 2 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic (Impacts 3.14-11, 3.14-27, 3.14-37, and 3.14-46).

Construction impacts on traffic were determined to be significant for the Proposed Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the arena and West Parking Garage under Alternative 2 would likely involve the same temporary lane closures. Therefore, construction impacts for Alternative 2 would be similar to those for the Proposed Project.

Although Project-related congestion would be slightly less than under the Proposed Project, the potential impact on emergency access to the CHMC would be essentially the same, and would ~~remain significant,~~ as under the Proposed Project.

require mitigation to be LTS

Utilities and Service Systems

Because the amount of impervious surfaces in Alternative 2 would be very similar to those under the Proposed Project, impacts related to storm drainage system capacity (Impacts 3.15-9 and 3.15-10) would be essentially the same as under the Proposed Project, with the same required mitigation measures.

Impacts Identified as Being Less Severe than the Proposed Project

Air Quality and Greenhouse Gas Emissions

Air Quality and GHG emissions during construction and operation under Alternative 2 would be similar to the Proposed Project but the reduced seating capacity of the arena and elimination of the other proposed ancillary uses (i.e., retail shops, outdoor stage, team practice facility, sports medical clinic, team offices) on the Arena Site and the hotel on the planned hotel on the East Transportation Site would reduce the amount of construction, and would reduce the overall

amount of associated traffic by 3 percent. There would be a corresponding decrease in criteria pollutant emissions, localized maximum daily operational emissions (NO_2), and GHG emissions. Therefore, similar to the Proposed Project, Alternative 2 would conflict with implementation of the applicable air quality plans, as operational emissions associated with the alternative, though reduced, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impact 3.2-1 and 3.2-5).

Impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO_2) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impact 3.7-1) would be reduced by approximately 3 percent, but would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b)), Mitigation Measure 3.2-2(b), which would require the testing of the emergency generators and fire pump generators on non-event days, Mitigation Measure 3.7-1(a), which would require the implementation of an ~~energy minimization and~~ GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the no net new GHG emissions threshold of significance.

needs to pick up all AQ MMs

Energy Demand and Conservation

Energy demand during construction and operation under Alternative 2 would be similar to the Proposed Project but lessened because the capacity of the arena would be reduced by 3 percent. This alternative would not include additional team facilities (i.e., team practice facility, sports medical clinic, and team offices) at the Project site, although the team offices and practice facility would continue to be used in their current sites. The planned hotel on the East Transportation Site would not be included, and thus would reduce the amount of energy demanded (Impacts 3.5-2 and 3.5-4).

Noise and Vibration

Noise levels under Alternative 2 would be similar to the Proposed Project but lessened as the seating capacity of the arena would be reduced by 3 percent and none of the other proposed facilities (i.e., retail shops, outdoor stage, team practice facility, sports medical clinic, and team offices) on the Arena Site and the hotel on the planned hotel on the East Transportation Site would be constructed. Therefore, impacts associated with a temporary increase in noise during construction and a permanent increase in noise during operation (Impacts 3.11-1, 3.11-2, 3.11-5 and 3.11-6) would be reduced as the duration of construction noise would be shorter (due to less building space) and the amount of traffic would decrease (due to fewer trips). In addition, vibration levels under Alternative 2 would also be similar to the Proposed Project but lessened for the same reasons. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-7) would be reduced, but would still require the implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

Like
~~Unlike~~ the Proposed Project, Alternative 2 would not expose people within portions of the Project Site where there is an expectation of quiet to excessive noise levels from aircraft operations at nearby LAX as the hotel and team medical clinic would not be constructed on the Project Site. For this reason, noise impacts associated with aircraft operations (Impacts 3.11-4 and 3.11-8) would be avoided, as with the Proposed Project.

Population, Employment and Housing

Impacts related to Population, Employment and Housing (Impacts 3.12-1 through 3.12-4) would remain less than significant under Alternative 2, although non-event-related employment generation on the Project Site would be reduced by about 90 percent. Because under Alternative 2 non-event-related employment on the Project Site would be reduced by about 90 percent, impacts on public schools (Impacts 3.13-11 and 3.13-12), already less than significant for the Proposed Project, would be further reduced under Alternative 2. The arena under Alternative 2 would be expected to generate a total of 35 new school students, a reduction of 15 students compared to the 50 students under the Proposed Project as described in Table 3.13-9.

Transportation and Circulation

The elimination of the ancillary uses in Alternative 2 would avoid the significant impacts identified for the Proposed Project's ancillary uses and hotel at intersections and neighborhood streets (Impacts 3.14-1 through 3.14-6, Impacts 3.14-17 through 3.14-22, Impacts 3.14-33, 3.14-34, 3.14-42, and 3.14-43).

The slight reduction in venue capacity would reduce the significant VMT impacts identified for events at the venue, but not to a less than significant level. The elimination of the ancillary uses and hotel would avoid the significant VMT impacts identified for the Project's ~~retail and~~ hotel use (Impacts 3.14-10, 3.14-26, 3.14-36, and 3.14-45).

Impact #5 aff

Utilities and Service Systems

Under Alternative 2, utility demands would be proportionately decreased as a result of the decreased capacity of the arena, and elimination of the practice facility, team offices, and sports medicine clinic in the Arena Structure, as well as the retail/restaurant, community, and hotel uses. Water demand of Alternative 2 would be approximately 48 percent lower than under the Proposed Project. Wastewater generation of Alternative 2 would be about 31 percent lower than under the Proposed Project. Solid waste generation of Alternative 2 would be approximately about 37 percent lower than under the Proposed Project.[3] As a result, impacts with respect to water supply (Impacts 3.15-2 and 3.15-4), wastewater treatment capacity (3.15-5, 3.15-7), and solid waste disposal capacity (3.15-11 and 3.15-13) would be less than significant under both the Proposed Project and Alternative 2.

[3] Memorandum – IBEC Alternative 2 – Wastewater & Solid Waste Generation, July 18, 2019.

Impacts Identified as Being More Severe than the Proposed Project

Noise

The impact of event-related noise on nearby sensitive receptors would be exacerbated under the Reduced Project Size Alternative. Plaza events that utilize amplified sound, including pre- or post-game concerts, would be more exposed due to the lack of intervening structures in the plaza meaning that more noise would escape the Project Site, and would travel greater distances, affecting more sensitive receptors. As such, affected sensitive receptors, especially those located to the northwest of the intersection of South Prairie Avenue and West Century Boulevard, as well as homes that are located south and west of the Arena, west of South Prairie Avenue and south of West 102nd Street, as well as the hotel use at 3900 West Century Boulevard would all be exposed to substantially higher levels of noise than disclosed for the Proposed Project (Impacts 3.11-2 and 3.11-6). Mitigation of these effects would either involve (1) reductions in the level of amplification for plaza events, or (2) construction of intervening walls or structures to obstruct line-of-sight between the plaza and nearby sensitive receptors.

Transportation and Circulation

Although few of the impacts of the Reduced Project Size Alternative would be more severe than those of the Proposed Project, it is notable that Alternative 2 would fail to respond to several policies of the City of Inglewood General Plan which encourage the development of employment-generating uses in the City. Further, by eliminating the potential to consolidate LA Clippers team uses, including the arena, practice facility, sports medicine and treatment facilities, and team offices in a single location, Alternative 2 would likely increase the amount of travel between these uses that are currently located disparately throughout the region. The result of this would be increased trip-making and increased VMT. Further, the elimination of complementary ancillary uses on the Project Site would likely increase trip-making and VMT for both regular daytime employees as well as for event attendees who would have to travel to other locations for food and drink, hotels, and other activities (Impacts 3.14-10, 3.14-26, 3.14-36, and 3.14-45). These effects would tend to exacerbate the generation of air pollutants, GHG emissions, congestion, and other such effects at a regional level.

Relationship to Project Objectives

The Reduced Project Size Alternative would meet some, but not all of the City's objectives for the project. The City objectives to promote economic development, the economic health and welfare, and City revenues (City Objective 2); to strengthen the community by providing public and youth-oriented space (City Objective 4); and to increase sports and entertainment employment opportunities (City Objective 6) would only be partially met under this alternative as no retail use, team practice facility, sports medical clinic or team offices would be included. Further, the elimination of the team practice facility, sports medical clinic, and team office means that the LA Clippers would continue to generate VMT and associated air pollutants and GHG emissions during commute trips between these uses located around the Los Angeles basin. As such, Alternative 2 would be less responsive to City Objective 8 because it would be less environmentally conscious than the Proposed Project.

With the addition of Alternative 3 at this location, the potential exists for outdoor lighting, building façade lighting, and illuminated signage on the arena and/or parking structures that would face the residences to result in light levels in excess of the significance threshold (Impacts 3.1-2 and 3.1-5). This would be similar to the impacts of the Proposed Project on adjacent sensitive receptors, and would be mitigated through implementation of Mitigation Measures 3.1-2(a) through (b). * Note: no hotel, so no MM 2(c).

Biological Resources

A number of trees are located on and/or adjacent to the City Services Center site. In addition, as discussed in Section 3.3, Biological Resources, a number of trees are also located on and/or adjacent to the Arena Site where the City Services Center and fire academy would be relocated. As a result, Alternative 3 could disturb nesting raptors or migratory birds (Impact 3.3-2) and result in the loss of protected trees (Impact 3.3-3). Mitigation Measures 3.3-2 and 3.3-3 would reduce these impacts by requiring that steps be taken to protect these resources during construction. As a result, impacts on nesting raptors or migratory birds and protected trees would be similar to those described for the Proposed Project.

Cultural and Paleontological Resources

Like the Project Site, there are no known archaeological or paleontological resources located on the City Services Center site. However, according to the TOD EIR, it is likely that development in Downtown Inglewood, including on the City Services Center site, could disturb buried archaeological resources,[5] destroy previously unknown unique paleontological resources,[6] and disturb unknown human remains.[7] In addition, as discussed in Section 3.4, Cultural and Tribal Cultural Resources, and Section 3.6, Geology and Soils, unknown archaeological resources, paleontological resources and human remains may also be located on the Arena Site where the City Services Center and fire academy would be relocated. For these reasons, it is possible that, like with the Proposed Project, implementation of Alternative 3 could cause a substantial adverse change in the significance of unknown historic, archaeological, or tribal cultural resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-5, 3.4-6, and 3.4-7), unknown paleontological resources (Impacts 3.6-2 and 3.6-4) and/or unknown human remains (Impacts 3.4-4 and 3.4-8). Mitigation Measures 3.4-1, 3.4-4, and 3.6-2 would reduce these impacts by requiring that work stop if such resources are uncovered, and that the resources be appropriately evaluated and treated. Therefore, impacts on archaeological resources, paleontological resources, and human remains would be similar to the Proposed Project.

5 City of Inglewood, 2016. *Downtown Inglewood and Fairview Heights Transit Oriented Development Plan Program EIR*. November 1, 2016. p. 4.D-14.

6 City of Inglewood, 2016. *Downtown Inglewood and Fairview Heights Transit Oriented Development Plan Program EIR*. November 1, 2016. p. 4.D-16.

7 City of Inglewood, 2016. *Downtown Inglewood and Fairview Heights Transit Oriented Development Plan Program EIR*. November 1, 2016. p. 4.D-18.

Land Use and Planning

Like the Proposed Project, Alternative 3 would not result in the division of an established community, nor would it be inconsistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus Alternative 3 would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

Public Services

Because impacts of the Proposed Project on public services, including fire and police protection, parks and recreation facilities, and public schools would be largely driven by event activity at the proposed arena, these impacts would remain largely unchanged and would continue to be less than significant (see Impacts 3.13-1 through 3.13-12) under Alternative 3.

Transportation and Circulation

Under Alternative 3, the ability to walk to the Crenshaw/LAX light rail line Downtown Inglewood Station without the need for shuttling would increase the attractiveness of rail transit, although this effect could be partially offset since only one rail line would be thus accessible. As such, it is anticipated that vehicle trip generation for major events in the arena at the City Services Center Alternative site would be similar to that for the Proposed Project.

This alternative would therefore be expected to have intersection, neighborhood street, and freeway facility impacts for major events at a similar level as the Proposed Project (Impacts 3.14-1 through 3.14-9, Impacts 3.14-17 through 3.14-25, Impacts 3.14-33 through 3.14-35, and Impacts 3.14-42 through 3.14-44), although distributed across the transportation system differently. Although the City Services Center Alternative site is closer to the I-405 freeway (0.6 miles) than is the Proposed Project (1.3 miles), it is farther from the I-110 and I-105 freeways; thus, regional trips would not be distributed as evenly and freeway impacts would be concentrated on the I-405. Furthermore, although Florence Avenue and La Brea Avenue (designated as major arterials in the City of Inglewood General Plan) serve the area near the site, the street grid system breaks down in the north part of Inglewood surrounding the City Services Center Alternative site, with curvier streets, less arterial capacity, and discontinuous streets in the vicinity.

Eucalyptus Avenue and Beach Avenue both travel through residential neighborhoods to the north of the City Services Center Alternative site. Since both of these streets would provide direct access to parking garages for the arena, neighborhood street impacts would be expected on these streets (Impacts 3.14-4 through 3.14-6, Impacts 3.14-20 thorough 3.14-22, Impacts 3.14-34 and 3.14-43).

The amount of on-site parking under this alternative would be similar to that for the Proposed Project, meaning that a substantial amount of parking (roughly 3,700 to 4,100 spaces for a major event) would still need to be provided off site. Some could be accommodated in parking garages in the downtown Inglewood area and in the nearby Faith Central Bible Church parking structure, but shuttling would be required to off-site parking, presumably at Hollywood Park, to avoid spillover parking into residential neighborhoods.

Similar to the Proposed Project, Alternative 3 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic (Impacts 3.14-11, 3.14-27, 3.14-37, and 3.14-46).

Construction impacts on traffic were determined to be significant for the Proposed Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the Project at the Alternative 3 site would likely involve temporary lane closures along the Eucalyptus Avenue frontage of the site for construction of a parking garage. Therefore, construction impacts for Alternative 3 would be in a different location, but would be similar in magnitude to those described for the Proposed Project.

Utilities and Service Systems

The existing storm drain system in the area of the City Services Center Alternative and Arena sites may not have sufficient capacity to handle post-construction stormwater runoff from each site (Impacts 3.15-9 and 3.15-10). In order to lessen the significance of these impacts for Alternative 3, like the Proposed Project, Mitigation Measures 3.15-9 and 3.15-10 would require the project to comply with a number of regulations governing water quality and drainage (Mitigation Measure 3.9-1(a)). As a result, impacts related to stormwater drainage would be similar to the Proposed Project.

Impacts Identified as Being Less Severe than the Proposed Project

Because Alternative 3 would be located away from the busy West Century Boulevard and South Prairie Avenue corridors, and because the amount of development in Alternative 3 is less than under the Proposed Project, a number of significant impacts of the Proposed Project would be lessened or avoided.

Aesthetics

Although the aesthetic impacts of the Proposed Project to views and visual character would be less than significant, none of the effects described near the Project Site would occur under Alternative 3. There would be development on the Arena Site, but it would be low in scale other than the fire academy tower, and would not be large in scale. Because the streets surrounding the City Services Center Alternative site are narrower and not straight for extended distances, views are relatively constrained, and as such there would be less potential for disruption of long-range views under Alternative 3 (Impact 3.1-1). Further, the significant impacts of increased light at sensitive receptors around the Project Site, including the residences at 10226 and 10204 South Prairie Avenue, as well as residences on the west side of the West Parking Garage Site, would not occur under Alternative 3 as development would not be lit at night (Impacts 3.1-2 and 3.1-5).

Air Quality and GHG Emissions

Air Quality and GHG emissions during construction and operation under Alternative 3 would be similar to the Proposed Project but lessened because this alternative would disturb slightly less soil (i.e., 9.7 acres on the City Services Center Alternative site and approximately 10 acres on the Arena Site) and would not include additional team facilities (i.e., team practice facility, sports

medical clinic, and team offices), the planned hotel on the East Transportation Site, or a new potable water well, and thus, the duration of construction would be shorter and fewer trips would be generated during operation. In addition, as discussed under Transportation, below, the elimination of the office, practice facility, sports medicine clinic, and hotel uses in Alternative 3 and the ability to walk to rail transit would reduce weekday peak hour trip generation by the ancillary uses by more than half from that estimated for the Proposed Project, with corresponding decreases in both criteria air pollution and GHG emissions directly from the Proposed Project. However, the lack of consolidation of the LA Clippers uses on a single site would tend to offset some of these reductions as a result of increased amounts of travel between the Arena Structure, team offices currently located in downtown Los Angeles, and practice facility in Playa Vista.

Therefore, similar to the Proposed Project, Alternative 3 would conflict with implementation of the applicable air quality plans, as operational emissions associated with the alternative, though reduced, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impact 3.2-1 and 3.2-5). In addition, impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO_2) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impacts 3.7-1 and 3.7-2) would be reduced, but would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)), Mitigation Measure 3.2-2(b), which would require testing of the emergency generators and fire pump generators on non-event days, Mitigation Measure 3.7-1(a), which would require the implementation of an ~~energy minimization and~~ GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the no net new GHG emissions threshold of significance.

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Energy Demand and Conservation

Energy demand during construction and operation under Alternative 3 would be similar to the Proposed Project but lessened because this alternative would not include additional team facilities (i.e., team practice facility, sports medical clinic, and team offices), the planned hotel on the East Transportation Site, or a new potable water well, and thus would reduce the amount of energy demanded (Impacts 3.5-2 and 3.5-4).

Hazards and Hazardous Material

Alternative 3 would not result in an air navigation hazard as the City Services Center Alternative site as it is not located within an airport land use area plan. For this reason, hazards impacts associated with air navigation (Impacts 3.8-5) would be avoided under this alternative and Mitigation Measure 3.8-5 would not be required.

Noise and Vibration

As described above, there are three residential homes that are considered sensitive receptors immediately across West Beach Avenue. Construction noise levels under Alternative 3 would also be similar to the Proposed Project but lessened in duration as this alternative would not

include additional team facilities (i.e., team practice facility, sports medical clinic, and team offices), the planned hotel on the East Transportation Site, or a new potable water well, and thus the construction period would be shorter and fewer vehicle trips would be generated during operation. Like with the Proposed Project, operational sound from outdoor plaza events from amplification systems would result in significant impacts at sensitive receptors proximate to the City Services Center site, but because compared to the Proposed Project there are fewer sensitive receptors that are in close proximity to the City Services Center site, this impact would be less severe than under the Proposed Project. Therefore, impacts associated with a temporary increase in noise during construction and a permanent increase in noise during operation (Impacts 3.11-1, 3.11-2, 3.11-5, and 3.11-6) would be reduced, but would still require implementation of Mitigation Measure 3.11-1, which would require the implementation of measures and controls to reduce noise during construction, Mitigation Measure 3.11-2(a), which would require the preparation of a noise reduction plan major events, and Mitigation Measure 3.11-2(b), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)).

Vibration levels under Alternative 3 would also be similar to the Proposed Project but lessened as the duration of construction would be shorter. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-6) would be reduced, but would still require the implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

Project conclusion is LTS so this is off.

Unlike the Proposed Project, Alternative 3 would not result in the construction of the hotel and team medical clinic and the City Services Center Alternative site is located entirely outside the 65 dBA contour for aircraft operations from LAX. Thus, Alternative 3 would not expose sensitive receptors within the Project Site to excessive noise levels from aircraft operations. For this reason, noise impacts associated with aircraft operations (Impacts 3.11-4 and 3.11-8) would be avoided.

Population, Employment and Housing

Impacts related to Population, Employment and Housing (Impacts 3.12-1 through 3.12-4) would remain less than significant under Alternative 3, although non-event-related employment generation on the City Services Center Alternative site would be reduced by about 62 percent. Because non-event-related employment on the City Services Center Alternative site would be reduced by about 62 percent under Alternative 3, impacts on public schools (Impacts 3.13-11 and 3.13-12), already less than significant for the Proposed Project, would be further reduced under Alternative 3. The arena and commercial uses under Alternative 3 would be expected to generate a total of 38 new school students, a reduction of 12 students compared to the 50 students under the Proposed Project as described in Table 3.13-9.

Transportation and Circulation

The elimination of the office, practice facility, and sports medicine clinic uses in Alternative 3 and the ability to walk to rail transit would reduce weekday peak hour trip generation by the ancillary uses by more than half from that estimated for the Proposed Project, substantially reducing or possibly even avoiding the significant impacts of the ancillary uses at intersections and neighborhood streets (Impacts 3.14-1, 3.14-4, 3.14-17, and 3.14-20).

The elimination of the hotel use would avoid the significant VMT impact identified for the Proposed Project's hotel use (Impacts 3.14-10, 3.14-26, 3.14-36, and 3.14-45).

Pedestrian impacts could be lessened since event attendees parking off site at Hollywood Park would be shuttled to the off-site locations and would not have to cross arterial streets to access the off-site parking (Impacts 3.14-13, 3.14-29, 3.14-39, and 3.14-48).

The nearest emergency room to the Alternative 3 site is located at the Centinela Hospital ~~Medical~~ Center, approximately 1.1 miles from the site. Given that large events at the Alternative 3 site would directly impact La Brea Avenue and Eucalyptus Avenue, two of the primary north-south routes across the future Metro Crenshaw/LAX light rail line within the City of Inglewood, Project-related congestion could impact emergency access to the CHMC from northern portions of the City. This impact would be less severe than emergency access impacts of the Proposed Project, but could nonetheless ~~be significant~~.

Given the location of the City Services Center Alternative site relative to The Forum and the NFL Stadium, Project impacts on intersections, neighborhood streets, freeway facilities, and public transit during concurrent events at The Forum and/or the NFL Stadium would be shifted and somewhat lessened from those for the Proposed Project during concurrent events (Impacts 3.14-33 through 3.14-35 and Impacts 3.14-42 through 3.14-44).

Utilities and Service Systems

Under Alternative 3, utility demands would be proportionately decreased as a result of the elimination of the practice facility, team offices, and sports medicine clinic in the Arena Structure and hotel uses. As described above, these uses would continue to exist and operate in their current locations. Water demand of Alternative 3 would be approximately 31 to 35 percent lower than under the Proposed Project. Wastewater generation of Alternative 3 would be about 22 percent lower than under the Proposed Project. Solid waste generation of Alternative 3 would be approximately about 22 percent lower than under the Proposed Project.[9] As a result, impacts with respect to water supply (Impacts 3.15-2 and 3.15-4), wastewater treatment capacity (3.15-5, 3.15-7), and solid waste disposal capacity (3.15-11 and 3.15-13) would be less than significant under both the Proposed Project and Alternative 3.

[9] Memorandum – IBEC Alternative 3 – Wastewater & Solid Waste Generation, July 18, 2019.

Impacts Identified as Being More Severe than the Proposed Project

Although the amount of development included in the City Services Center Site Alternative is less than under the Proposed Project, the specific aspects of the site create the potential for impacts that would be more severe than under the Proposed Project.

Aesthetics

Because of the narrowness of the surrounding streets and the presence of residential uses immediately across West Beach Avenue, the potential for spillover lighting effects on residential uses is greater than under the Proposed Project (Impacts 3.1-2 and 3.1-5). In addition, the location of the residences to the northeast of the Arena Structure and 8-story Parking Structure B and 7-story Parking Structure C that would be located across the street would create the potential for shadows to be cast on the homes in afternoons in the winter (Impact 3.1-3). Due to the over 400-foot length and east-west alignment of the two parking structures, such effects would be longer lasting than shadow effects on homes under the Proposed Project and it is likely that these impacts would be significant. If such shadows were significant, mitigation would involve reducing the height of the West Beach Avenue parking structures, which could also materially reduce the available parking on the City Services Center Alternative Site.

Transportation and Circulation

Of the streets immediately bordering the City Services Center Alternative site, Eucalyptus Avenue is designated as a minor arterial, Beach Avenue and Ivy Avenue are designated as collector streets, and Cable Place is a local street. Each of these streets currently provide only one traffic lane in each direction in the vicinity of the alternative site, and Eucalyptus Avenue and Ivy Avenue will have at-grade crossings with the Crenshaw/LAX light rail line. As such, the ability of Eucalyptus Avenue to adequately accommodate peak event flows into and out of Parking Structure A and of West Beach Avenue to adequately accommodate peak event flows into and out of Parking Structures B and C would result in significant street and site access impacts (Impacts 3.14-4 through 3.14-6, Impacts 3.14-20 through 3.14-22, Impacts 3.14-34 and 3.14-43).

Impact #s off.

Relationship to Project Objectives

The City Services Center Alternative would meet some of City's objectives for the project. In particular, the project would meet the City's goals of becoming a regional sports and entertainment center (City Objective 1) and stimulating economic development (City Objective 2). In addition, given the location of the site near the future Crenshaw/LAX light rail line, the project would also meet the City's goal of encouraging public transit opportunities (City Objective 6).

However, although Alternative 3 would include relocation of current City Services Center and the firefighter training academy uses to the Arena Site portion of the Project Site, it would result in a less intensive use of the Project Site than the Proposed Project. Because City objective 5 is to '[t]ransform vacant or underutilized land within the City into compatible land uses within aircraft noise contours generated by operations at LAX, in compliance with Federal Aviation Administration (FAA) grants to the City," Alternative 3 would not be as responsive to this

around the Baldwin Hills Alternative Site, and the environmental impacts of redevelopment of the site.

Impacts Identified as Being the Same or Similar to the Proposed Project

Because the size of the arena and the amount of development would be essentially the same as the development in the Proposed Project, many of the impacts of the Proposed Project that are affected by the intensity of development would remain the same or very similar at the Baldwin Hills Alternative Site.

Aesthetics

The aesthetic conditions around the Baldwin Hills Alternative site are different in specifics than at the Project Site, but similar in character. The site is adjacent to a major commercial corridor, in this case Crenshaw Boulevard, with other commercial lined streets backed by residential neighborhoods on several sides. Long range views are of urbanized Los Angeles, and while the proposed arena and associated uses at this site would be clearly identifiable, the aesthetic change of the site from a regional shopping mall with major parking resources to an arena with parking resources would not be material (Impact 3.1-1). Most of the immediately adjacent uses that would be potentially affected by shadows created by the larger structures are commercial in nature, and given the 4-story profile of the perimeter parking structures, it is unlikely that significant shadow impacts would affect nearby residential uses (Impact 3.1-3).

Although they would affect light sensitive receptors at a different location, the spillover lighting effects of Alternative 4 would be of similar magnitude as those of the Proposed Project. Adjacent to the Baldwin Hills Alternative site there are light sensitive residences across Stocker Street and Santa Rosalia Drive. Illuminated signage on retail buildings and parking structures, plaza lighting, and arena façade lighting could spillover these streets and result in light in excess of City of Los Angeles standards on residential properties. While many of these current light sensitive receptors are in proximity to the existing Baldwin Hills mall uses, the increased height, signage, and area lighting from the proposed type of development could exacerbate existing light levels and create significant impacts (Impacts 3.1-2 and 3.1-5). Like the Proposed Project, Alternative 4 would require implementation of Mitigation Measure 3.1-2(a) through (c).

Biological Resources

A number of trees are located on and/or adjacent to the Baldwin Hills Alternative site so it is likely that tree loss or other construction activities that would occur with Alternative 4 could disturb nesting raptors or migratory birds (Impact 3.3-2). Mitigation Measure 3.3-2 would reduce these impacts by requiring that steps be taken to protect this resource during construction. As a result, impacts to nesting raptors or migratory birds would be similar to the Proposed Project.

by the project at this site. Although the net new trips generated by major events at the arena would be reduced somewhat, a substantial reduction in the level of intersection, neighborhood street, or freeway facility impacts would not be expected (Impacts 3.14-1 through 3.14-9, Impacts 3.14-17 through 3.14-25, Impacts 3.14-33 through 3.14-35, and Impacts 3.14-42 through 3.14-44).

In general, regional highway facilities are located further from the Baldwin Hills Alternative site than the regional highway facilities that serve the Project site. Regional access to the Baldwin Hills Alternative site is provided by the I-10 freeway, located approximately 1.6 miles to the north, the I-110 freeway, located about 3.1 miles to the east, and the I-405 freeway, located approximately 3.5 miles to the west. Local access to the Baldwin Hills Alternative site is provided by Crenshaw Boulevard and Martin Luther King Jr. Boulevard, both of which are designated as Avenue I arterial streets in the City of Los Angeles *Mobility Plan 2035*, and Stocker Street, a Boulevard II arterial street in the *Mobility Plan 2035*.[15] Each of the streets bordering the Baldwin Hills Alternative site provide multiple traffic lanes.

Similar to the Proposed Project, Alternative 4 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic (Impacts 3.14-11, 3.14-27, 3.14-37, and 3.14-46).

Pedestrian impacts could be similar since not all parking would be provided on the Baldwin Hills Alternative site and pedestrians could be crossing arterial streets to access off-site parking (Impacts 3.14-13, 3.14-29, 3.14-39, and 3.14-48).

Construction impacts on traffic were determined to be significant for the Proposed Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the Project at the Alternative 4 site would likely involve temporary lane closures along the Stocker Street frontage of the site for construction of a parking garage. Therefore, construction impacts for Alternative 4 would be in a different location but could be similar in magnitude to those for the Proposed Project.

Utilities and Service Systems

Similar to the Proposed Project, Alternative 4 would demand approximately 103 acre-feet per year (AFY) with the implementation of baseline water conservation measures and about 63 AFY with LEED Gold certification. Water service to the Baldwin Hills Alternative site is provided by the Los Angeles Department of Water and Power (LADWP). In accordance with the requirements of Senate Bill 610 and California Water Code section 10912(a), LAWDP, as the designated water supplier, prepared a Water Supply Assessment (WSA) for development proposed under the Baldwin Hills Crenshaw Plaza Master Plan. The WSA concluded that the anticipated additional 332.5 AFY of annual water demand under the Master Plan falls within the City's projected water supplies for normal, single-dry, and multiple-dry years through the year 2030 and falls within the

[15] City of Los Angeles, *Mobility Plan 2035, An Element of the General Plan*, Adopted January 2016.

City's 25-year water demand growth projection.[16] As Alternative 4 would demand substantially less water than the Baldwin Hills Crenshaw Plaza Master Plan, LADWP would also have sufficient supply to serve development under Alternative 4. This impact would be the same as the Proposed Project.

In addition, like with the Proposed Project, the existing storm drain system in the vicinity of the Baldwin Hills Alternative site may have insufficient capacity to accommodate post-construction stormwater runoff from the Alternative 4 development (Impacts 3.15-9 and 3.15-10). Mitigation Measures 3.15-9 and 3.15-10 would require the project to comply with a number of regulations governing water quality and drainage (Mitigation Measure 3.9-1(a)). As a result, impacts related to stormwater capacity would be similar to those described for the Proposed Project.

Impacts Identified as Being Less Severe than the Proposed Project

Air Quality and GHG Emissions

Air Quality and GHG emissions during construction and operation under Alternative 4 would be similar to the Proposed Project but slightly lessened as this alternative would not include the planned hotel on the East Transportation Site or a new potable water well. Therefore, similar to the Proposed Project, Alternative 4 would conflict with implementation of the applicable air quality plans, as operational emissions associated with the alternative, though somewhat reduced, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impacts 3.2-1 and 3.2-5).

Impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO_2) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impact 3.7-1 and 3.7-2) would be slightly reduced, but would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)), Mitigation Measure 3.2-2(b), which would require the testing of the emergency generators and fire pump generators on non-event days, Mitigation Measure 3.7-1(a), which would require the implementation of an energy minimization and GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the no net new GHG emissions threshold of significance.

pick up all AQ mits

Biological Resources

None of the trees listed in the City of Los Angeles Protective Tree Ordinance occur on the Baldwin Hills Alternative site.[17] As a result, Alternative 4 would not result in the loss of protected trees (3.3-3). Mitigation Measure 3.3-3 to reduce this impact would not be required. As a result, impacts to protected trees would be avoided under this alternative.

[16] City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR.* November 2016. pp. IV.M.2-11 to IV.M.2-12.

[17] City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR.* November 2016. Appendix A, Initial Study, p. 5.

Energy Demand and Conservation

Energy demand during construction and operation under Alternative 4 would be similar to the Proposed Project but slightly lessened as this alternative would not include the planned hotel on the East Transportation Site or a new potable water well Impacts 3.5-2 and 3.5-4.

Hazards and Hazardous Materials

Alternative 4 would not result in an air navigation hazard as the Baldwin Hills Alternative site is not located within an airport land use area plan. For this reason, hazards impacts associated with air navigation (Impact 3.8-5) would be avoided under this alternative and Mitigation Measure 3.8-5 would not be required.

Noise and Vibration

Alternative 4 would not expose people residing or working within the Baldwin Hills Alternative site to excessive noise levels from aircraft as the site is not located within 2 miles of a public airport or public use airport. For this reason, noise impacts associated with aircraft operations (Impacts 3.11-4 and 3.11-8) would be avoided under this alternative.

Transportation and Circulation

The removal of a portion of the existing retail uses at Baldwin Hills Crenshaw Plaza shopping mall to accommodate the Project at the Baldwin Hills Alternative site would reduce the net vehicle trip increase generated by the project at this site. Net new trips generated by the ancillary uses would be reduced to the extent that intersection and street impacts are unlikely for the ancillary uses (Impacts 3.14-1, 3.14-4, 3.14-17, and 3.14-20). Net new trips generated by daytime events uses would be reduced because of both the removal of a portion of the existing uses and the ability to walk to rail transit, reducing intersection, neighborhood street, and freeway facility impacts for daytime events (Impacts 3.14-2, 3.14-5, 3.14-8, 3.14-8, 3.14-21, and 3.14-24).

Average trip lengths for attendees of events at the Baldwin Hills Alternative site would likely be shorter than those for events at the Proposed Project given the site's location closer to the regional center, reducing the significant VMT impacts identified for events at the Proposed Project, but not to a level that is less than significant. The elimination of the hotel use would avoid the significant VMT impact identified for the Proposed Project's hotel use (Impacts 3.14-10, 3.14-26, 3.14-36, and 3.14-45).

The nearest emergency rooms to the Alternative 4 site are located at the Kaiser Permanente West Los Angeles Medical Center, approximately 2.7 miles from the site, and the Southern California at Culver City, approximately, 3.3 miles from the site. Given the distance from the site, impacts on emergency access would not be expected to be significant,

Given that the location of the Baldwin Hills Alternative site is over 3 miles from The Forum and the NFL Stadium, the level of additional project-related impact on intersections, neighborhood streets, freeway facilities, and public transit during concurrent events at The Forum and/or the NFL Stadium would be substantially reduced from that for the Proposed Project during

concurrent events (Impacts 3.14-33 through 3.14-35, Impact 3.14-37, Impacts 3.14-42 through 3.14-44, and Impact 3.14-46).

Impacts Identified as Being More Severe than the Proposed Project

Cultural Resources

According to Master Plan EIR, two known archaeological sites are located on the Baldwin Hills Alternative site. Archaeological site survey records indicate the presence of archaeological burial remains and artifacts including abalone shells, mollusk shells, chipped stone points, and other unidentified material that were identified and recorded in 1946 during construction of the Broadway Building on the northern mall parcel and again in 1951 during excavation for the basement store.[18] In addition, the younger quaternary alluvium deposits underneath the Baldwin Hills Alternative site typically do not contain significant fossil vertebrate remains; however, older, deeper deposits underneath the site may contain significant vertebrate fossils.[19]

For these reasons, similar to the Project Site, it is possible that the Baldwin Hills Alternative site may contain unknown historical, archaeological, or tribal cultural resources (Impacts 3.4-1, 3.4-2, 3.4-3, 3.4-5, 3.4-6, and 3.4-7), unknown paleontological resources (Impacts 3.6-2 and 3.6-4), and/or unknown human remains (Impacts 3.4-4 and 3.4-8). As noted above, the Master Plan EIR identified that there are two known archaeological sites within the Project Site, and City of Los Angeles Historic-Cultural Monument No. 487 (Sanchez Ranch) is located within 500 feet of the Project Site. Both archaeological resource sites 19-000080 and 19-001336, and City of Los Angeles Cultural Monument No. 487, have recorded the existence of Native American burial remains and other artifacts including abalone shells, mollusk shells, and chipped stone points. Due to the proximate location of the proposed grading areas and these sites, potential to disturb other undiscovered Native American remains that may exist beneath the Project Site is considered moderate to high. Because of the potential for accidental discovery of such resources occur during construction, this impact would be potentially significant and considered more severe than that described for the Proposed Project.

Mitigation Measures 3.4-1, 3.4-4, and 3.6-2 would reduce these impacts by requiring that work stop if such resources are uncovered, and that the resources be appropriately evaluated and treated. Nevertheless, because of the known presence of Native American archaeological resources, including human remains and burial artifacts on and near the Baldwin Hills Alternative Site, impacts on archaeological resources, paleontological resources, and human remains would be more severe than for the Proposed Project.

Noise and Vibration

Ambient noise levels at locations around the Baldwin Hills Alternative site are similar, but somewhat lower than those in the vicinity of the Project Site. Noise levels along perimeter streets

[18] City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR.* November 2016. p. IV.D.2-9.
[19] City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR.* November 2016. p. IV.D.2-6.

The design of the arena would change in response to the conditions on the District at South Bay Alternative site. Investigation of and planning for remediation of the former landfill started in the late 1970s, and continued for about 40 years. The DTSC Remedial Action Plan for the former landfill requires the creation of an impervious cap underlain by clean fill.[23] Thus, in order to avoid substantial changes to those earlier plans that would be associated with substantial excavation, instead of excavating to a depth of up to 35 feet and removing approximately 376,000 cubic yards of earth and former landfill materials from the site to accommodate the arena bowl, under Alternative 5, the arena would be constructed on a pad that would require the import of a similar amount of soil in order to build up the land area around the arena to avoid disturbing the buried landfill materials on the site.

This alternative would not include a hotel or a new municipal water well.

Comparative Analysis of Environmental Effects

Table 6-2 at the end of this chapter provides an impact-by-impact comparison of the significant impacts of the Proposed Project and Alternative 5. In addition, the comparative analysis of environmental effects provided below was informed by The District at South Bay Specific Plan EIR,[24] which provided information relating to existing conditions in and around the Carson Alternative Site.

Impacts Identified as Being the Same or Similar to the Proposed Project

Aesthetics

Like the Project Site, the District at South Bay Alternative site is located in an urbanized area. The area in the vicinity of the Carson site does not contain notable features that would be considered unique geologic features or scenic resources located near a scenic highway, and does not have any scenic vistas. The site is adjacent to the San Diego Freeway which is not designated as a state scenic highway. As such, like the Proposed Project, the project built and operated at the District at South Bay Alternative site would not substantially damage any scenic resources within a state scenic highway. Because of the setting and location of adjacent uses, there would be no significant impacts related to shadowing of residences or other sensitive uses (Impact 3.1-3). These impacts would be of the same magnitude as under the Proposed Project. Finally, the spillover lighting effects of Alternative 5 would be of similar magnitude as those of the Proposed Project (Impacts 3.1-2 and 3.1-5). Adjacent to the District at South Bay Alternative site are light sensitive residences to the south and west across the Torrance Lateral Channel. Lighting in the parking lots surrounding the arena could spill over to these areas and result in light in excess of City of Carson standards on residential properties. Like the Proposed Project, Alternative 4 would require implementation of Mitigation Measures 3.1-2(a) through (e).

[23] City of Carson, *Carson Marketplace Addendum to the Final Environmental Impact Report*, State Clearinghouse Number 20050510059, July 2009. pp. 15–16.

[24] City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018.

public use airport and would not result in a safety hazard for people residing or working in the vicinity of the site (Impacts 3.11-3 and 3.11-6).

Alternative 5 would not result in an air navigation hazard as the District at South Bay Alternative site is not located within an airport land use area plan. For this reason, hazards impacts associated with air navigation (Impacts 3.8-5) would be avoided under this alternative and Mitigation Measure 3.8-5 would not be required.

Hydrology and Water Quality

Development under Alternative 5 would not degrade the quality of the water that is discharged from the District at South Bay Alternative site (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). Construction on the District at South Bay Alternative site would be required to adhere to best management practices listed the NPDES General Construction Permit to reduce potential adverse effects with regard to water quality. During operation, the proposed arena and other facilities would be subject to the drainage control requirements of the County's 2009 Standard Urban Stormwater Mitigation Plan (SUSMP) permit and the City's Storm Water Pollution Control Measures for New Development Projects.[33] In addition, any alterations to existing drainage patterns as a result of Alternative 5 would not be of a sufficient magnitude so as to result in substantial erosion or siltation or flooding on or off site (Impact 3.9-3 and 3.9-6).[34] As a result, Mitigation Measures 3.9-1(a) and 3.9-1(b) to reduce impacts related to water quality and drainage would not be required. For this reason, impacts related to on-site contamination would be less than those described for the Proposed Project.

Noise and Vibration

Noise levels under Alternative 5 would be similar to the Proposed Project but lessened as sensitive receptors to the west and south of the District at South Bay Alternative site are located further away from construction activity and roadways than sensitive receptors under the Proposed Project. The nearest sensitive residential receptors that may be affected by the Proposed Project at the District at South Bay Alternative site are one- and two-story detached residences and mobile homes that are located across the Torrance Lateral Channel to the south and west of the site. Future residential uses have been approved across Del Amo Boulevard from the area of the District at South Bay Alternative site. In addition, the San Diego Freeway is a substantial noise source to the east of the District at South Bay Alternative Site, and the Porsche Experience, located across Del Amo Boulevard immediately north of the recently approved residences, is an entertainment use that already creates substantial noise in the area. Ambient noise levels measured at the site range from about 50 to 78 dBA across the site, generally in a west-to-east configuration with higher noise levels near the San Diego Freeway, and lower levels near the residential uses south and west of the site.[35] This is a much wider range of noise levels than at the Project Site. Because the noise levels produced by the Proposed Project constructed at the District at South Bay Alternative site would be similar to those predicted for the Proposed Project, it is possible that the impacts would be less

[33] City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-11.
[34] City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. VI-12.
[35] City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. Table IV.H-1, p. IV.H-6.

severe on the eastern side of the property, near the San Diego Freeway, and potentially more severe on the south and western side of the site, adjacent to current residential uses.

Therefore, impacts associated with a temporary increase in noise during construction and a permanent increase in noise during operation (Impacts 3.11-1, 3.11-2,3.11-5, and 3.11-6) would be reduced, but would still require implementation of Mitigation Measure 3.11-1, which would require the implementation of measures and controls to reduce noise during construction, Mitigation Measure 3.11-2(a), which would require the preparation of a noise reduction plan major events, and Mitigation Measure 3.11-2(b), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)). In addition, vibration levels under Alternative 5 would also be similar to the Proposed Project but lessened for the same reasons. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-7) would be reduced, but would still require the implementation of Mitigation Measures 3.11-3(a) through (c), which requires minimum distances of construction equipment from sensitive receptors and the designation of a construction relations officer to field vibration-related complaints.

Transportation and Circulation

The District at South Bay Alternative site is located approximately 3.5 miles from the Metro Blue Line station at Del Amo Boulevard, approximately 1.5 miles from the Metro Silver Line station on the I-110 freeway at Carson Street, and approximately 1.8 miles from the Harbor Gateway Transit Center. As such, it is assumed that the Project at this location would provide shuttle service to the Blue Line and Silver Line similar to the shuttle service to the Crenshaw/LAX and Green Lines to be provided as part of the Proposed Project. Although the Silver Line is an express bus service with lower capacity than a light rail line, bus service can be readily increased if needed and the Silver Line provides one-seat service to the Metro Red/Purple Lines and Union Station in downtown Los Angeles. As such, it is anticipated that vehicle trip generation for events in the arena at the District at South Bay Alternative site would be similar to that for the Proposed Project.

Regional access to the District at South Bay Alternative site would be provided by the I-405 freeway (immediately adjacent to the east), the I-110 freeway (approximately 0.5 miles to the west), the SR-91 freeway (about 1.9 miles to the north), and the I-710 freeway (approximately 3.4 miles to the east). Overall, these regional highway facilities are located closer to the District at South Bay Alternative site than the regional highway facilities that serve the Proposed Project are to the Proposed Project site, including direct access to the I-405 freeway via the Avalon Boulevard interchange located immediately adjacent to the site (Impacts 3.14-7 through 3.14-9 and Impacts 3.14-23 through 3.14-25). Direct access to the site is provided by three streets designated as major highways in the City of Carson General Plan: Del Amo Boulevard (six lanes), Avalon Boulevard (six lanes), and Main Street (four lanes). There are no direct street connections across the Torrance Lateral Flood Control Channel connecting to the residential neighborhoods to the south and west. For all of these reasons, locating the Project on the District at South Bay Alternative site would likely impact a lesser number of intersections and

neighborhood streets than the Proposed Project (Impacts 3.14-1 through 3.14-6 and Impacts 3.14-17 through 3.14-22).

Since all parking would be provided on site under Alternative 5, pedestrian impacts would be lessened since impacts associated with pedestrians crossing arterial streets would not be expected to be significant (Impacts 3.14-13, 3.14-29, 3.14-39, and 3.14-48). This could also potentially lessen eventgoer confusion regarding where they should park and reduce local circulation.

The elimination of the hotel use would avoid the significant VMT impact identified for the Proposed Project's hotel use (Impacts 3.14-10, 3.14-26, 3.14-36, and 3.14-45).

The nearest emergency room to the Alternative 5 site is located at the Harbor-UCLA Medical Center, approximately 1.1 miles from the site. Given the distance from the site and that the Harbor-UCLA Medical Center is located on the far side of the Harbor Freeway and served by different major arterials (Carson Street, Vermont Avenue, and Normandie Avenue) than those serving the site, impacts on emergency access would not be expected to be significant.

Construction impacts on traffic were determined to be significant for the Proposed Project due to temporary lane closures along the Project frontages on South Prairie Avenue and West Century Boulevard. Construction of the Project at the Alternative 5 site would be generally internal to the site and would likely not involve temporary lane closures along arterial streets. Therefore, construction impacts for Alternative 5 would be less than those for the Proposed Project.

Given that the location of the District at South Bay Alternative site is over 8 miles from The Forum and the NFL Stadium, the Project at this site would not be likely to have additional significant impacts on intersections, neighborhood streets, freeway facilities, and public transit during concurrent events at The Forum and/or the NFL Stadium (Impacts 3.14-33 through 3.14-35 and Impacts 3.14-42 through 3.14-44).

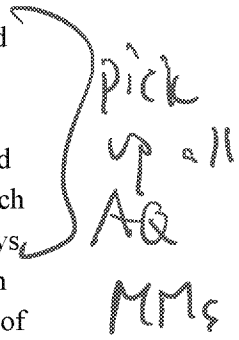
Impacts Identified as Being More Severe than the Proposed Project

Air Quality and GHG Emissions

Air Quality and GHG emissions during construction under Alternative 5 would be similar to the Proposed Project but slightly lessened as this alternative would not include the planned hotel on the East Transportation Site and no parking structures would be constructed. However, operational air pollutant and GHG emissions would be increased compared to the Proposed Project because the project developed at the District at South Bay Alternative site would have less accessibility to transit and therefore higher automobile trip generation. In addition, because of its increased distance from Staples Center, VMT would be increased due to increased trip lengths. The combination of increased trips and increased trip lengths means that transportation-related emissions of criteria air pollutants and GHGs would be increased compared to the Proposed Project. Therefore, similar to the Proposed Project, Alternative 5 would conflict with implementation of the applicable air quality plans, however operational emissions associated with

the alternative would exceed thresholds established by the SCAQMD for criteria air pollutants by a greater amount than under the Proposed Project (Impact 3.2-1 and 3.2-5).

Impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO_2) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impact 3.7-1 and 3.7-2) would be increased, and would still require the implementation of Mitigation Measure 3.2-2(a), which would require the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)), Mitigation Measure 3.2-2(b), which would require the testing of the emergency generators and fire pump generators on non-event days, Mitigation Measure 3.7-1(a), which would require the implementation of an energy minimization and GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the project below the no net new GHG emissions threshold of significance. It is very likely that the required GHG offsets would be materially greater than under the Proposed Project.



Energy Demand and Conservation

Impacts related to Energy Demand and Conservation would be greater for the District at South Bay Alternative than those of the Proposed Project. Like for the Proposed Project, it is assumed that the Alternative 5 project would be built to comply with the requirements of LEED Gold certification. Because the project at the District at South Bay Alternative site would not include construction of either the hotel or the parking structures, energy required for construction would tend to be less than under the Proposed Project. However, due to increased trip making and VMT, operational transportation energy would be increased compared to the Proposed Project. Construction impacts, which may be decreased compared to the Proposed Project, are one-time events and relatively short in duration, compared to operational impacts which occur on a continual basis over a 30-year or more period. Thus, on balance, energy effects of the project at the District at South Bay Alternative site would be more severe than those of the Proposed Project (Impacts 3.5-2 and 3.5-4).

Hazards and Hazardous Materials

The initial investigations of contamination at the District at South Bay Alternative site go back to the late 1970s. As a result of contamination discovered on and adjacent to the District at South Bay Alternative site, the site was listed as a hazardous substances site by the California Department of Toxic Substances Control (DTSC) in the 1980s and a remedial action order requiring implementation of remedial activities was issued for the site in 1988.[36] Remediation of the District at South Bay Alternative site was divided by the DTSC into two operable units (OU). A remedial action plan (RAP) for the Upper OU was approved in 1995, which was modified by an Explanation of Significant Differences (ESD) in 2009. A separate RAP for the Lower OU was prepared in 2005. The purpose of the Upper OU RAP was to make the District at South Bay Alternative site safe for future development. The purpose of the Lower OU RAP was to protect

[36] City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. II-13.

groundwater resources and was not required to make the District at South Bay Alternative site safe for future resources.[37]

The Upper OU RAP requires the installation, operation, and maintenance of (1) a landfill cap designed to encapsulate the waste and create a barrier between future improvements and buried waste, (2) an active gas collection and treatment system designed to remove landfill gases from under the landfill cap, and (3) a groundwater collection and treatment system designed to contain a groundwater plume underneath the site and treat the extracted groundwater prior to discharge.[38] Development under Alternative 5 would be required to adhere to these requirements. The arena foundation would need to be supported by a pile system, with individual piles driven to the bearing soil beneath the waste. Given the density of the pile system to support a building of the scale of the proposed arena, and the nature of the extensive landfill gas collection system, it is likely that material changes to the landfill gas collection system may be required, and it is possible that construction workers could be exposed to contamination during ground disturbing and foundation construction activities. These impacts would be more severe than those described for the Proposed Project in Impact 3.8-4. Mitigation Measure 3.8-4 would require the preparation and approval of the Soil Management Plan prior to initiating earthwork activities, which would reduce the potential for worker exposures. This measure would be required to be expanded to include coordination with the State Department of Toxic Substance Control (DTSC), and implementation of any required amendments or updates to the RAP for the site. For this reason, impacts related to on-site contamination would be more severe than those described for the Proposed Project.

Transportation and Circulation

Three of the streets surrounding or within the Alternative 5 site are identified in the City of Carson *Master Plan of Bikeways*[39] for future bicycle improvements: colored buffered bike lanes on Del Amo Boulevard, buffered bike lanes on New Stamps Road, and a bike path along Lenardo Drive (shown as Stadium Way on Figure 6-4) from the east end of the site to Avalon Boulevard. As such, depending on the location of parking access and shuttle bus pull-outs, construction and operation of the Project could adversely affect planned bicycle facilities. Strategic placement of Traffic Control Officers could potentially mitigate any such impacts.

Average trip lengths for attendees of events at the District at South Bay Alternative site would likely be longer than those for events at the Proposed Project given the site's location farther from the regional center, increasing the level of the significant VMT impacts identified for events at the Proposed Project (Impacts 3.14-10, 3.14-26, 3.14-36, and 3.14-45).

Relationship to Project Objectives

The City of Inglewood's basic objectives for the Proposed Project involve economic development, revitalization, and enhancing the welfare of the City and its residents, transforming underutilized property in the City, enhancing the identity of the City, and creating jobs in

[37] City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. II-14.
[38] City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018. p. II-14.
[39] City of Carson, 2013. *Carson Master Plan of Bikeways*. August 2013.

under construction at HPSP, impacts on the transportation system would be reduced from those anticipated for Concurrent Event Scenarios 3 and 4. Although concurrent events transportation impacts may be reduced based on an enhanced level of schedule coordination between the operators of the NFL Stadium and the Alternative 6 arena, discussed above, concurrent events between those two venues could take place and concurrent events with The Forum would still occur, and therefore the identified concurrent event significant and unavoidable impacts for the Proposed Project would remain so under Alternative 6.

Because the frequency with which concurrent events occurs would be reduced, the likelihood of impacts to emergency access during concurrent events would be correspondingly reduced, but would remain significant and unavoidable during concurrent events.

Utilities and Service Systems

Under Alternative 6, utility demands on the HPSP Alternative site would decrease as the hotel use would be eliminated. Due to the elimination of the hotel, water demand of Alternative 6 would be approximately 20 percent lower than under the Proposed Project. Wastewater generation of Alternative 6 would be about 3 percent lower than under the Proposed Project. Solid waste generation of Alternative 6 would be approximately about 4 percent lower than under the Proposed Project.[44] As a result, impacts with respect to water supply (Impacts 3.15-2 and 3.15-4), wastewater treatment capacity (3.15-5, 3.15-7), and solid waste disposal capacity (3.15-11 and 3.15-13) would be less than significant under both the Proposed Project and Alternative 6.

The existing off-site storm drain system in the area of the HPSP Alternative site has been planned with major infrastructure to accommodate development throughout the 238-acre HPSP area. This is contrasted with the Project Site, which may not have sufficient capacity to handle post-construction stormwater runoff from the Proposed Project (Impacts 3.15-9 and 3.15-10). Thus, the impacts related to stormwater drainage and runoff would potentially be less than significant, but Alternative 6 would still require implementation of Mitigation Measures 3.15-9 and 3.15-10. Impacts related to stormwater drainage would likely be less severe than those described for the Proposed Project, but would still require mitigation.

Impacts Identified as Being More Severe than the Proposed Project

There are no impacts of Alternative 6 that were identified which would be more severe than those described for the Proposed Project.

Relationship to Project Objectives

The HPSP Alternative would meet some of City's objectives for the Proposed Project. In particular, the HPSP Alternative would meet the City's goals of becoming a regional sports and entertainment center (City Objective 1) and stimulating economic development (City Objective 2). The HPSP site has an approved specific plan that is currently being implemented. As such, although portions of the HPSP area are currently vacant, they are planned for development, and development is proceeding.

[44] Memorandum – IBEC Alternative 6 – Wastewater & Solid Waste Generation, August 23, 2019.

because the Forum Alternative would result in a new significant and unavoidable impact as a result of the demolition of the historic Forum building, it would be less responsive than the Proposed Project to City Objective 8, which calls for the project objectives to be achieved "in an expeditious and environmentally conscious manner."

The Forum Alternative would meet most but not all of the project applicant's objectives for the project. Because the Forum Alternative would first require feasibly acquiring the site, ~~it is uncertain if~~ Alternative 7 would allow the applicant to begin hosting LA Clippers home games in the 2024–2025 season. For this reason, the Forum Alternative could be unable to meet project applicant Objective 1a.

6.6 Alternatives Comparison and Environmentally Superior Alternative

In the evaluation of seven alternatives to the Proposed Project, presented in Section 6.5, above, the impacts of each alternative is discussed in comparison to the impacts of the Proposed Project, presented in Chapter 3 of this Draft EIR. **Table 6-2**, below, provides a consolidated comparison of the impacts of the Proposed Project and the Alternatives, indicates for each significant impact, whether the impacts of the project alternatives are equal to, less, or more severe than those of the Proposed Project.

An EIR is required to identify the Environmentally Superior Alternative from among the range of reasonable alternatives that are evaluated. CEQA Guidelines section 15126.6 (e)(2) requires that an environmentally superior alternative be designated and states that if the Environmentally Superior Alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

From the alternatives evaluated in this EIR, the Environmentally Superior Alternative would be Alternative 1, No Project Alternative. This alternative would avoid all significant impacts associated with the Proposed Project. The No Project Alternative would, however, fail to achieve any of the City's or project applicant's basic objectives of the Proposed Project.

As discussed above, when the No Project Alternative is identified as the Environmentally Superior Alternative, CEQA requires the Lead Agency to select the Environmentally Superior Alternative from among the other alternatives considered in the EIR. As is the situation in this EIR, in the case where the range of alternatives includes a number of alternative sites, the selection of an alternative that is considered environmentally superior often involves trade-offs between alternatives. For example, one alternative may have greater transportation impacts, while another may have lesser transportation impacts but greater cultural resources impacts. In the case of this EIR, each of the alternatives has a set of impacts that are somewhat similar and somewhat different due to the different distances from the current activities at Staples Center, and different physical characteristics and setting of the particular alternative site. Thus, the identification of the Environmentally Superior Alternative is to a considerable degree inherently subjective and value based.

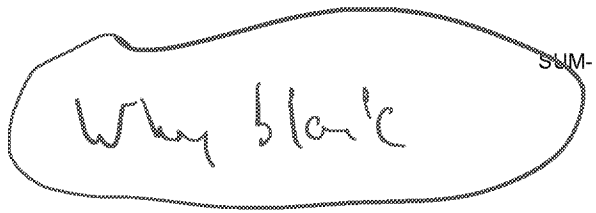
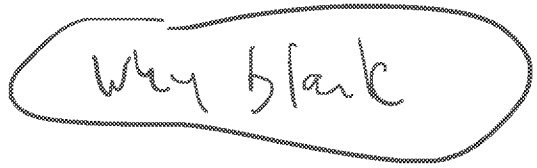
Alternative 6 would have impacts very similar to the Proposed Project, but would reduce the significance of construction and operational noise, compared to the Proposed Project, due to increased distance from the Alternative 6 site to noise sensitive receptors. In addition, because the development of Alternative 6 would involve increased coordination of events at the NFL Stadium and the Alternative 6 arena, it is even less likely that overlapping events would occur than with the Proposed Project.

Alternative 7 would involve the development of a similar amount of development and the same sized arena as under the Proposed Project, and thus impacts related to the intensity of use would be similar to those of the Proposed Project. Many of the transportation impacts of this Alternative are already occurring on the local street system around the Forum Alternative site, and thus would not be net new impacts resulting from Alternative 7. The demolition of the existing Forum building would eliminate the impacts of the Proposed Project created by scenarios of overlapping and concurrent events at The Forum, NFL Stadium, and Proposed Project arena. Further, because over 100 events per year are already occurring at The Forum, and because the hotel use would be eliminated from Alternative 7, there would be a material decrease in net new VMT, criteria air pollutant emissions, energy demand, water demand, and GHG emissions compared to the Proposed Project. Alternative 7 would, however, result in the demolition of an historic structure that is listed on the National Register and the California Register; an impact that is significant and unavoidable and which would not occur with the Proposed Project.

As discussed above, each of the sites has unique site-specific characteristics that would result in significant impacts, and the choice of sites would trade off such impacts as construction noise at the Project Site with cultural resources impacts at the Baldwin Hills Alternative Site, hazards impacts at the District at South Bay Alternative site, and historical resources impacts at the Forum Alternative site.

For the reasons discussed above, the City has determined that of the alternatives considered in this EIR, other than the No Project Alternative, the Environmentally Superior Alternative would be Alternative 3, the City Services Center Alternative.

TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON

Impact	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size Alternative	Alternative 3: City Services Center Alternative Site	Alternative 4: Baldwin Hills Alternative Site	Alternative 5: The District at South Bay Alternative Site	Alternative 6: HPSP Alternative Site	Alternative 7: The Forum Alternative Site
3.10 Land Use and Planning								
There are no significant project or cumulative impacts related to Land Use and Planning.								
3.11 Noise								
3.11-1: Construction of the Proposed Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	SUM	NI	SUM-	SUM-	SUM+	SUM-	SUM-	SUM=
3.11-2: Operation of the Proposed Project would result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Proposed Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	SUM	NI	SUM-				SUM-	SUM-
3.11-3: Construction of the Proposed Project would generate excessive groundborne vibration levels.	SUM	NI	SUM-	SUM-	SUM=	SUM-	SUM=	SUM=
3.11-5: Construction of the Proposed Project, in conjunction with other cumulative development, would result in cumulative temporary increases in ambient noise levels.	SUM	NI	SUM-	SUM-	SUM+	SUM-	SUM-	SUM=
3.11-6: Operation of the Proposed Project, in conjunction with other cumulative development, would result in cumulative permanent increases in ambient noise levels.	SUM	NI	SUM-				SUM-	SUM-
3.11-7: Construction of the Proposed Project, in conjunction with other cumulative development, would generate excessive groundborne vibration.	LSM	NI	LSM-	LSM-	LSM=	LSM-	SUM=	SUM=