

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 section 15126.6(e) of the CEQA Guidelines, 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. The CEQA Guidelines, Section 15126.6(a), state 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 regionally significant impact should consider the regional context), and whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned or controlled by the project applicant).

CEQA Guidelines section 15126.6(e) states that, “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” CEQA Guidelines section 15126.6(e)(3)(B) further states that when the proposed project is “a development project on identifiable property, the ‘no project’ alternative is the circumstance under which the project does not proceed.” This is the case for the Proposed Project addressed in this EIR.

The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Specifically, the CEQA Guidelines set forth the following criteria for selecting and evaluating alternatives:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly accomplish 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. An EIR need not consider every conceivable alternative to a project. 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 which are infeasible (see CEQA Guidelines section 15126.6(a)).
- [T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (see CEQA Guidelines section 15126.6(b)).
- The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should also 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 determination (see CEQA Guidelines section 15126.6(c)).
- The specific alternative of “no project” shall also be evaluated along with its impact (see CEQA Guidelines section 15126.6(f)(1)).
- The range of alternatives is to be governed by the “rule of reason.” CEQA requires that only those alternatives necessary to “permit a reasoned choice” be included, and that the range shall be limited to alternatives that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making (see CEQA Guidelines section 15126.6(f)).

- Alternative locations for the project are to be considered where any of the significant effects of the project could be avoided or substantially lessened by putting the project in another location (see CEQA Guidelines section 15126.6(f)(2)(A)).
- Finally, an EIR need not consider alternatives for which the environmental effects cannot be reasonably ascertained and for which implementation is remote and speculative (see CEQA Guidelines section 15126.6(f)(3)).

6.1.2 Organization of this Chapter

Following this introductory section, Section 6.2 describes the basis for selecting the alternatives analyzed in this Draft EIR; it reviews the project objectives, summarizes the significant impacts of the project that were identified in Chapter 3, and describes the alternatives screening and selection process. Section 6.3 includes a description of those alternatives that were considered by the City but dismissed from further evaluation. Section 6.4 provides an overview of the alternatives selected for further consideration, and Section 6.5 presents a detailed description of each of the selected alternatives, followed by an evaluation of its environmental impacts compared to those of the proposed project, and a description of its ability to meet the project objectives. Section 6.6 compares the impacts of the alternatives to the impacts of the proposed project and to one another, and it identifies the environmentally superior alternative.

6.2 Factors in the Selection of Alternatives

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR.

6.2.1 Project Objectives

As stated above, pursuant to CEQA Guidelines section 15126.6(a), the reasonable range of alternatives considered in this EIR must be capable of achieving “most of the basic objectives of the project,” while avoiding or lessening one or more of the significant impacts that would result from the project as proposed. Thus, the objectives of the Proposed Project are restated below.

The following are the City’s stated objectives for the Proposed Project:

1. Support the revitalization of the City of Inglewood, promote the City as a premier regional sports and entertainment center recognized at the local, regional, national, and international levels, and support its City of Champions identity by bringing back an NBA franchise to the City.
2. Facilitate a project that promotes the City’s objectives related to economic development, and that enhances the general economic health and welfare of the City by encouraging viable development, stimulating new business and economic activity, and increasing City revenue (property, sales, admissions and transient occupancy taxes).
3. Expand the opportunities for the City’s residents and visitors to participate in a wide range of sporting, cultural, civic and business events.

4. Strengthen the community by providing public and youth-oriented space, outdoor community gathering space, and outdoor plazas.
5. Transform 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.
6. Encourage sustainable, modern, integrated development that includes coordinated traffic event management strategies, encourages public transit opportunities to the Project Site, provides safe and adequate pedestrian circulation, and reflects a high level of architectural design quality and landscape amenities.
7. Establish a world class basketball and event center that increases sports and entertainment employment and construction-related employment opportunities in the City of Inglewood.
8. Achieve the objectives described above in an expeditious and environmentally conscious manner.

The following are the Project Applicant's stated objectives for the Proposed Project:

1. Build the long-term home of the LA Clippers NBA basketball team.

- a. Construct a state-of-the-art multi-purpose basketball and entertainment center with a capacity of up to 18,000 fixed seats to host LA Clippers home games beginning in the 2024-2025 NBA season.
- b. Locate a basketball and entertainment center on a site that is geographically desirable and accessible to the LA Clippers' current and anticipated fan base.
- c. Consolidate LA Clippers team operations and facilities in a single location that includes practice facilities, team executive and management offices, a sports medicine clinic, and adequate parking for both events and daily operations.
- d. Design and develop the basketball and entertainment center to accommodate up to 18,500 attendees for other entertainment, cultural, sporting, business and community events when not in use for LA Clippers home games.
- e. Create a lively, visitor- and community-serving environment year-round for patrons, employees, community members, and visitors to the surrounding neighborhood and nearby sports and entertainment venues by providing complementary onsite retail, dining, and/or community spaces.
- f. Contribute to the economic and social well-being of the surrounding community by providing public benefits such as opportunities for youth- and community-oriented programs, and increasing revenues generated by property and sales taxes, admissions taxes, and potential transient occupancy taxes.

- 2. Develop a financially viable Project that is constructed and operated from private funding sources.**
 - a. Locate the Proposed Project on a site that can be readily assembled and entitled to enable the feasible development of the Proposed Project to host the LA Clippers home basketball games in the 2024-2025 NBA season.
 - b. Create a unique visitor experience that is competitive with other new major event venues, including state-of-the-art media, sound, and lighting systems; patron amenities; and other features.
 - c. Enhance the future success of the Proposed Project by providing signage, naming rights, and sponsorship opportunities to assist in the private financing of the Proposed Project.
 - d. Support the financial viability of the Proposed Project by developing sufficient complementary on-site uses to enhance the productive use of the site on event and non-event days, including retail, dining, and potential hotel uses.

- 3. Design a Project that is synergistic with nearby existing and proposed uses and incorporates state-of-the-art urban design and venue design principles.**
 - a. Locate the Proposed Project on a site near other existing and planned mixed-use development to create a dynamic, year-round sports and entertainment district destination.
 - b. Develop the basketball and entertainment center with features that enhance the Proposed Project's sense of place as a major urban sports and entertainment venue, including gathering spaces, signage, and other amenities.
 - c. Create inviting and appropriately-scaled pedestrian environments to facilitate the movement of pedestrians and create safe and secure assembly areas for fans and visitors.
 - d. Develop the Proposed Project to meet high-quality urban design and sustainability standards.
 - e. Design the Proposed Project to take advantage of existing and planned public transit, and incorporate appropriate vehicular, pedestrian, and bicycle access and amenities that encourage sustainable transportation options.
 - f. Increase walkability and improve the pedestrian experience on adjacent public rights-of-way near the Project Site, and enhance the streetscape appearance by providing perimeter and interior landscaping.

6.2.2 Significant Effects of the Proposed Project

The following project-specific and cumulative potentially significant impacts have been identified for the Proposed Project, as discussed in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures.

Significant and Unavoidable Impacts

The Proposed Project was determined to have the following significant and unavoidable impacts, as described in detail in Chapter 3 of this Draft EIR.

Air Quality

Impact 3.2-1: Construction and operation of the Proposed Project would conflict with implementation of the applicable air quality plan.

Impact 3.2-2: Construction and operation of the Proposed Project would result in a cumulatively considerable net increase in NO_x emissions during construction, and a cumulatively considerable net increase in VOC, NO_x, CO, PM₁₀, and PM_{2.5} during operation of the Proposed Project.

Impact 3.2-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would result in inconsistencies with implementation of applicable air quality plans.

Impact 3.2-6: Construction and operation Proposed Project, in conjunction with other cumulative development, would result in cumulative increases in short-term (construction) and long-term (operational) emissions.

Noise

Impact 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.

Impact 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.

Impact 3.11-3: Construction of the Proposed Project would generate excessive groundborne vibration levels.

Impact 3.11-5: Construction of the Proposed Project, in conjunction with other cumulative development, would result in cumulative temporary increases in ambient noise levels.

Impact 3.11-6: Operation of the Proposed Project, in conjunction with other cumulative development, would result in cumulative permanent increases in ambient noise levels.

Impact 3.11-7: Construction of the Proposed Project, in conjunction with other cumulative development, would generate excessive groundborne vibration.

Transportation and Circulation

Impact 3.14-1: Operation of the Proposed Project's ancillary land uses would cause significant impacts at intersections under Adjusted Baseline conditions.

Impact 3.14-2: Daytime events at the Proposed Project's Arena would cause significant impacts at intersections under Adjusted Baseline conditions.

Impact 3.14-3: Major events at the Proposed Project's Arena would cause significant impacts at intersections under Adjusted Baseline conditions.

Impact 3.14-4: Operation of the Proposed Project's ancillary land uses would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.

Impact 3.14-5: Daytime events at the Proposed Project's Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.

Impact 3.14-6: Major events at the Proposed Project's Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.

Impact 3.14-8: Daytime events at the Proposed Project's Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions.

Impact 3.14-9: Major events at the Proposed Project's Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions.

Impact 3.14-10: Certain components of the Proposed Project would generate VMT in excess of applicable thresholds.

Impact 3.14-11: The Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit.

Impact 3.14-16: Implementation of the Proposed Project's ancillary land uses would cause significant impacts at intersections under cumulative conditions.

Impact 3.14-17: Daytime events at the Proposed Project's Arena would cause significant impacts at intersections under cumulative conditions.

Impact 3.14-18: Major events at the Proposed Project's Arena would cause significant impacts at intersections under cumulative conditions.

Impact 3.14-19: Implementation of the Proposed Project's ancillary land uses would cause significant impacts on neighborhood streets under cumulative conditions.

Impact 3.14-20: Daytime events at the Proposed Project's Arena would cause significant impacts on neighborhood streets under cumulative conditions.

Impact 3.14-21: Major events at the Proposed Project’s Arena would cause significant impacts on neighborhood streets under cumulative conditions.

Impact 3.14-23: Daytime events at the Proposed Project’s Arena would cause significant impacts on freeway facilities under cumulative conditions.

Impact 3.14-24: Major events at the Proposed Project’s Arena would cause significant impacts on freeway facilities under cumulative conditions.

Impact 3.14-25: The Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.

Impact 3.14-28: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under Adjusted Baseline conditions.

Impact 3.14-29: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on freeway facilities under Adjusted Baseline conditions.

Impact 3.14-30: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would adversely affect public transit operations or fail to adequately provide access to transit.

Impact 3.14-33: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under Cumulative conditions.

Impact 3.14-34: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on freeway facilities under Cumulative conditions.

Impact 3.14-35: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.

Significant Impacts that can be Mitigated to Less than Significant

The Proposed Project was determined to have the following significant impacts, all of which could be mitigated to a less-than-significant level with implementation of identified mitigation measures, as described in detail in Chapter 3 of this Draft EIR.

Aesthetics

Impact 3.1-2: Construction and operation of the Proposed Project could have the potential to create a new source of substantial light or glare which could adversely affect day or nighttime views in the area.

Impact 3.1-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could have the potential to cumulatively create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Biological Resources

Impact 3.3-2: Construction of the Proposed Project could have the potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Impact 3.3-3: Construction of the Proposed Project could have the potential to conflict with local policies or ordinances protecting biological resource, such as a tree preservation policy or ordinance.

Cultural and Tribal Cultural Resources

Impact 3.4-1: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5.

Impact 3.4-2: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5.

Impact 3.4-3: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k).
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Impact 3.4-4: Construction of the Proposed Project could have the potential to disturb human remains including those interred outside of dedicated cemeteries.

Impact 3.4-5: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to result in cumulatively considerable impacts to historical resources.

Impact 3.4-6: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on archaeological resources.

Impact 3.4-7: Construction of the Proposed Project, in conjunction with construction of other cumulative development, could have the potential to contribute to cumulative impacts on the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074.

Impact 3.4-8: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on human remains including those interred outside of dedicated cemeteries.

Geology and Soils

Impact 3.6-1: Construction and operation of the Proposed Project could have the potential to result in the substantial erosion or the loss of topsoil.

Impact 3.6-2: Construction of the Proposed Project could have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

Impact 3.6-3: Construction and operation of the Proposed Project in conjunction with other cumulative development, could have the potential to result in substantial erosion or loss of topsoil.

Impact 3.6-4: Construction of the Proposed Project, in conjunction with other cumulative development, could have the potential to contribute to cumulative impacts on paleontological resources.

Greenhouse Gas Emissions

Impact 3.7-1: Construction and operation of the Proposed Project could have the potential to generate "net new" GHG emissions, either directly or indirectly, that could have a significant impact on the environment.

Impact 3.7-2: Construction and operation of the Proposed Project could be inconsistent with applicable plans, policies and regulations adopted for the purpose of reducing the emissions of GHGs.

Hazards and Hazardous Materials

Impact 3.8-4: Construction and operation of the Proposed Project would 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, could have the potential to create a significant hazard to the public or the environment.

Impact 3.8-5: Construction and operation of the Proposed Project would be located within an airport land use plan area and could result in a safety hazard or excessive noise for people residing or working in the project area or could create a hazard to navigable airspace and/or operations at a public airport.

Hydrology and Water Quality

Impact 3.9-1: Construction and operation of the Proposed Project could have the potential to violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality, or conflict with or obstruct implementation of a water quality control plan.

Impact 3.9-3: Construction and operation of the Proposed Project could have the potential to substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which has the potential to: result in substantial erosion or siltation on or off site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flow.

Impact 3.9-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development within the Dominguez Channel Watershed, could have the potential to cumulatively violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality or conflict with or obstruct implementation of a water quality control plan.

Impact 3.9-6: Construction and operation of the Proposed Project, in conjunction with other cumulative development in the Dominguez Channel Watershed, could have the potential to cumulatively alter the drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flow.

Land Use and Planning

No significant impacts under Land Use and Planning.

Population, Employment and Housing

No significant impacts under Population, Employment and Housing.

Public Services

No significant impacts under Public Services.

Transportation and Circulation

Impact 3.14-13: The Proposed Project could adversely affect existing or planned pedestrian facilities, or fail to adequately provide for access by pedestrians.

Impact 3.14-14: The Proposed Project could result in inadequate emergency access.

Impact 3.14-15: The Proposed Project could substantially affect circulation for a substantial duration during construction.

Impact 3.14-25: The Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.

Impact 3.14-26: The Proposed Project could result in inadequate emergency access under cumulative conditions.

Impact 3.14-27: The Proposed Project could substantially affect circulation for a substantial duration during construction under cumulative conditions.

Impact 3.14-31: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, could result in inadequate emergency access.

Impact 3.14-32: The Proposed Project could substantially affect circulation for a substantial duration during construction during major events at The Forum and/or the NFL Stadium.

Impact 3.14-36: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, could result in inadequate emergency access under cumulative conditions.

Impact 3.14-37: The Proposed Project could substantially affect circulation for a substantial duration during construction during major events at The Forum and/or the NFL Stadium under cumulative conditions.

Utilities and Service Systems

Impact 3.15-9: Construction and operation of the Proposed Project could have the potential to require or result in the relocation or construction of new or expanded storm water drainage facilities or expansion of existing facilities, the construction or relocation of which could have the potential to cause significant environmental effects.

Impact 3.15-10: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could have the potential to result in the relocation or construction of new storm water drainage facilities or expansion of existing facilities, the construction or relocation of which could have the potential to cause significant environmental effects.

6.3 Alternatives Considered but Dismissed from Further Evaluation

As required pursuant to CEQA Guidelines section 15126.6(c), in the scoping process that resulted in the selection of alternatives for analysis in this Draft EIR, consideration was given to alternatives that could avoid or substantially lessen potentially significant impacts resulting from the Proposed Project. In response to the NOP, several comments suggested alternatives for consideration in the EIR, and those NOP comments are addressed below.

Certain impacts that are identified as being significant under the Proposed Project are due primarily to intensifying development activity in an area that is currently underutilized; such intensity-related impacts include increased traffic congestion, air emissions, nighttime lighting, and the like. These impacts potentially could be substantially lessened by limiting the size of the project. Other impacts are specific to the location of the Project Site, including but not limited to traffic impacts on South Prairie Avenue, West Century Boulevard, and other major and minor streets in the vicinity of the Project Site, as well as construction and operational noise impacts on nearby residences and other sensitive receptors. Such impacts are largely unavoidable at the Project Site but it may be possible to avoid or substantially lessen these impacts by constructing a version of the Proposed Project at a different location. For these reasons, alternatives that reduce the intensity of development on the Project Site or change the location of the Project Site are addressed in this chapter.

The following alternatives were considered but dismissed from further analysis because they would not fulfill most of the basic objectives of the project, would not avoid or substantially lessen significant environmental impacts, and/or would otherwise be infeasible.

6.3.1 Entertainment Venue

Under this alternative the Project Site would be developed with retail, restaurants, an entertainment center, and a major hotel. The purpose of the alternative would be to create a unique destination that would complement planned uses located within the Hollywood Park Specific Plan (HPSP) and the existing venue at The Forum. The alternative would be patterned and sized similar to other entertainment venues within the Southern California region including Downtown Disney in Anaheim (20 acres), Universal Citywalk in Universal City (23 acres), The Grove in Los Angeles (17.5 acres), and Great Wolf Lodge in Garden Grove (13 acres).

This alternative was dismissed from further consideration because the Project Site is fragmented, does not provide a single parcel of sufficient size on which to develop a thoughtfully arranged entertainment district. This alternative was also dismissed because it could draw business away from similar land uses approved for development within the neighboring HPSP, and thus could negatively affect the City's economic development goals for the HPSP area. Finally, this alternative would fail to meet most of the basic objectives of the Proposed Project, including the City's objective to establish a world class basketball and event center and to bring an NBA

franchise back to Inglewood (City Objective 1), and the Applicant's goals to build the long-term home of the LA Clippers NBA basketball team (Applicant Objectives 1a-f).

6.3.2 Substantially Reduced Arena

Under this alternative the size of the arena on the Project Site would be materially reduced sufficiently to substantially lessen the significant transportation and related air quality impacts of the Proposed Project. In order to achieve such a lessening, in this alternative the capacity of the arena would have to be reduced by 50 percent or more, leading to a maximum capacity of no more than 9,000 attendees. This alternative would result in fewer people visiting the site and thus fewer trips being generated on the local and regional transportation system. In turn, this alternative would reduce impacts associated with traffic and traffic-related air pollutant emissions and noise.

This alternative was dismissed from further consideration because the material reduction in the size of the arena (e.g. 50 percent reduction in seats) that would be needed to substantially lessen traffic-related impacts would not meet the NBA's sizing requirements for the arena. The smallest recently-constructed NBA arenas include those built in Sacramento (Golden 1 Center, opened in 2016) and Milwaukee (Fiserv Forum, opened in 2018) which were built with an NBA game capacity of approximately 17,500. The smallest arena that is home to an NBA team is the Smoothie King Center in New Orleans, built in 1999 with a capacity of 16,867. An arena that would meet NBA standards and is of a size comparable to the recently-opened arenas in Sacramento and Milwaukee is discussed below under Alternative 2.

Because this alternative would be below the capacity required by the NBA, it would fail to meet most of the basic objectives of the Proposed Project, including the City's objective to establish a world class basketball and event center and to bring an NBA franchise back to Inglewood (City Objective 1), and the Applicant's goals to build the long-term home of the LA Clippers NBA basketball team (Applicant Objectives 1a-f).

6.3.3 Housing

A comment on the Notice of Preparation (NOP) suggested consideration of an alternative consisting of the development of housing on the Project Site, consistent with the R-3 zone that existed on the project site prior to 1980 (see Appendix B). Under this alternative the Project Site would be developed with a variety of housing types, including single-family, condominium/townhome, and multi-family uses.

This alternative was eliminated from further consideration because of inconsistency with the existing and anticipated noise environment associated with Los Angeles International Airport (LAX). The Project Site is located approximately two miles east of LAX, along the extended centerlines of Runways 25R and 25L. As such, the Project Site is located within the planning boundary/airport influence area (AIA) established for LAX in the Los Angeles County Airport Land Use Plan (ALUP). According to the Los Angeles County Airport ALUP, the Project Site is

located in areas exposed to noise levels ranging from CNEL 65 dB-70dB, and from CNEL 70 dB-75 dB. Consistent with ALUP Policies G-1 and N-3, the compatibility of proposed land uses is determined by consulting the land use compatibility table provided in Section V of the ALUP, and according to the table, residential land uses located in areas exposed to noise levels of CNEL 65 dB – 70 dB must be reviewed for noise insulation needs while residential land uses in areas exposed to noise levels of CNEL 70 dB – 75 dB are to be avoided unless they are related to airport services.

Moreover, between the 1980s and the early 2000s, the City engaged in a property purchase program, supported by FAA noise mitigation funds, to remove residential uses within these noise contours. This alternative would consist of reversing this program, and constructing new housing on the site. The FAA has stated that residential development of these noise-impacted properties is “inherently inconsistent with the intent of the City’s land acquisition/noise mitigation program, approved and funded by the FAA,” and that residential use of the properties “may be inconsistent with Grant Assurance #21, Compatible Land Use; and Grant Assurance 31, Disposal of Land.”¹ For these reasons, and in light of the noise environment at the Project Site, this alternative was dismissed from further consideration.

In addition, this alternative was eliminated from further consideration because it would fail to meet most of the basic objectives of the Proposed Project, including the City’s objective to promote the City as a premier regional sports and entertainment center and to establish a world class basketball and event center and to bring an NBA franchise back to Inglewood (City Objective 1); to establish a world class basketball and event center that increases sports and entertainment and construction-related employment opportunities; to expand opportunities for City residents and visitors to participate in sporting, cultural and civic events (City Objective 3); and to transform the Project Site to uses compatible with the aircraft noise contours generated by operations at LAX and in compliance with the FAA grants to the City (City Objective 5).

Further, development of a housing alternative would not meet the Applicant’s objectives to build the long-term home of the LA Clippers NBA basketball team (Applicant Objectives 1a-e); to contribute to the economic and social well-being of the surrounding community by providing public benefits such as opportunities for youth- and community-oriented programs, and increasing revenues generated by property and sales taxes, admissions taxes, and potential transient occupancy taxes (Applicant Objective 1f); to create a unique visitor experience that is competitive with other new major event venues, including state-of-the-art media, sound, and lighting systems; patron amenities; and other features (Applicant Objective 2b); and to develop a basketball and entertainment center with features that enhance the Project’s sense of place as a major urban sports and entertainment venue, including gathering spaces, signage, and other amenities (Applicant Objective 3b).

¹ David F. Cushing, Manager, Los Angeles Airports District Office, U.S. Department of Transportation, Federal Aviation Administration, August 26, 2019.

6.3.4 Employment Center/Business Park

As requested by several comments on the NOP and consistent with the Inglewood International Business Park (IIBP) Specific Plan, the City considered an alternative under which the Project Site would be developed with employment generating uses such as a business park or light industrial uses. This alternative was dismissed from further consideration because since the approval of the IIBP Specific Plan in 1993 the City has sought to attract businesses to the Project Site, but has not been able to generate momentum or build interest in the site from private sector business park developers. The inability to construct a business park on the site, despite decades-long City efforts to encourage such uses, indicates that a business park is economically infeasible at this location. In addition, a very substantial amount of commercial office space is planned in the neighboring HPSP, including 466,000 square feet in the Adjusted Baseline projects and another 3,567,314 square feet under cumulative conditions (see Section 3.0, subsections 3.0.6 and 3.0.7). Development of this amount of commercial office space would meet demand for office and employment generating uses in the area, and accomplish the City's goals for job generation.

Also, this alternative was eliminated from further consideration because it would fail to meet most of the basic objectives of the Proposed Project, including the City's objective to promote the City as a premier regional sports and entertainment center and to establish a world class basketball and event center and to bring an NBA franchise back to Inglewood (City Objective 1); to expand opportunities for City residents and visitors to participate in sporting, cultural and civic events (City Objective 3); and to establish a world class basketball and event center that increases sports and entertainment and construction-related employment opportunities (City Objective 7).

Further, development of a housing alternative would not meet the Applicant's objectives to build the long-term home of the LA Clippers NBA basketball team (Applicant Objectives 1a-e); to contribute to the economic and social well-being of the surrounding community by providing public benefits such as opportunities for youth- and community-oriented programs, and increasing revenues generated by property and sales taxes, admissions taxes, and potential transient occupancy taxes (Applicant Objective 1f); to create a unique visitor experience that is competitive with other new major event venues, including state-of-the-art media, sound, and lighting systems; patron amenities; and other features (Applicant Objective 2b); and to develop a basketball and entertainment center with features that enhance the Project's sense of place as a major urban sports and entertainment venue, including gathering spaces, signage, and other amenities (Applicant Objective 3b).

6.3.5 Alternative Locations in the City of Inglewood

The City has identified Alternative 3 – the City Services Center Alternative Site – as an alternative location within the City that is potentially feasible. The City has also considered whether there are other sites in the City that are potentially feasible. As set forth below, the City considered the following, alternative site, and determined that the alternative site was infeasible, would not meet most of the City's or applicant's basic project objectives, or would not avoid or substantially lessen the project's significant environmental effects.

Imperial/Crenshaw Commercial Center

The City considered the Imperial/Crenshaw Commercial Center as a potentially feasible alternative location. This site is approximately 10.5 acres and is located at the southeast corner of the intersection of Imperial Highway and Crenshaw Boulevard, approximately 1.5 miles southeast of the Project Site. The Center is made up of an approximately 210,000 sf set of one-story commercial buildings containing retail and service businesses, a six-story, approximately 96,000 sf office building, an approximately 5,000 sf retail outparcel containing a fast-food restaurant, and approximately 7.7 acres of surface parking lot.

Although not as large as the Project Site, this site was deemed of sufficient size to accommodate the arena structure and a limited amount of parking and complementary uses. It had certain advantages including proximity to the LA Metro Green Line Crenshaw Station, only 0.5 miles south on Crenshaw, near I-105, and similar close access to the I-105 freeway. The site is located only approximately 0.4 miles from the end of the runway at Hawthorne Airport, but is outside of any limiting airport safety zones or noise contours.

This alternative would fail to meet several of the City's basic objectives of the Proposed Project. Although the site is located within the City, this site would not meet certain of the City's objectives. This alternative would not transform 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, and would not strengthen the community by providing public and youth-oriented space, outdoor community gathering space, and outdoor plazas. Because of its small size, this site would fail to meet the applicant's goal of consolidating LA Clipper team operations and facilities in a single location (1c), and due to its distance from the NFL Stadium and The Forum, it would not respond to applicant objective 1(e) which calls for the creation of a lively, visitor- and community-serving environment year-round for patrons, employees, community members, and visitors to the surrounding neighborhood and nearby sports and entertainment venues.

The majority of the buildings are occupied by current tenants and the property owners have recently invested in an upgrade and expansion of the Center. The site is not underutilized or vacant, and is well maintained. The site is not currently for sale or reasonably considered available for development. For all of these reasons, the City eliminated this site from further consideration.

6.3.6 Alternative Locations Considered by the Project Applicant

With its lease at Staples Center expiring at the end of the 2023-2024 NBA season, the LA Clippers organization began exploring options for a new arena in the Los Angeles area in late 2014/early 2015. The LA Clippers engaged a team of experienced professionals to identify sites in the greater Los Angeles area that could accommodate a new, state-of-the-art NBA arena,

relocated LA Clippers team facilities, and supporting, ancillary commercial, retail, and community uses.

The process of identifying potential sites involved consideration of key preliminary site criteria such as adequate site size and configuration (with specifics varying depending on site conditions and parking arrangements), proximity to existing and anticipated future fan base, access to existing and planned transportation and parking facilities, environmental conditions, site acquisition and development cost (including tenant relocation considerations), and an ability to assemble and control the site within the timeframe needed to open a new arena by the 2024- 2025 NBA season.

The following is a summary of some of the main sites that were identified and considered in preliminary site analyses.

Numerous sites in and around downtown Los Angeles were identified and considered. They were ultimately not selected due to site assembly and/or relocation issues: (a) the Piggyback site and UPS Site along the Los Angeles River near the intersection of Highway 101 and the I-5 Freeway; (b) Civic Center East near Little Tokyo and Union Station; (c) the BOS Yard in Boyle Heights at East 7th Street and South Mission Road, just east of the Los Angeles River and west of the I-10 Freeway; and (d) 8th and Alameda, just west of the Los Angeles River and north of the I-10 Freeway.

Sites on the west side of Los Angeles, in closer proximity to the existing and anticipated future fan bases, were preliminarily identified, but while under consideration by the LA Clippers these sites or portions thereof were sold to other developers and/or development commenced on those sites or portions thereof: (a) Fairfax DWP at South Fairfax Avenue and the I-10 Freeway; (b) Howard Hughes Center; and (c) Centinela Avenue and Jefferson Boulevard.

The preliminary site analysis also considered sites south of Inglewood, and as far south as Long Beach. Of those, the District at South Bay site, located in Carson west of the San Diego Freeway (I-405) and south of Del Amo Boulevard, was outside of but closest to the preferred west side fan base location. This site is analyzed as Alternative 5, in section 6.5 below.

On the west side of Los Angeles, in addition to Inglewood, the team considered the Marlton Square area in Baldwin Hills. The team first considered a development site to the south and west of the intersection of Marlton Avenue and Martin Luther King Jr. Boulevard. While that site was being analyzed, the immediately adjacent Kaiser Permanente Baldwin Hills-Crenshaw Medical Center along Santa Rosalia Drive was under construction, and it was determined that it would be infeasible to develop the arena and provide necessary access to the arena and the Kaiser facility on the remainder of the site from either Marlton Avenue or Martin Luther King Jr. Boulevard. The team conducted a preliminary analysis of the Baldwin Hills Crenshaw Plaza Mall site east of Marlton Avenue and identified site assembly and entitlement challenges. The Baldwin Hills Crenshaw Plaza mall site is analyzed as Alternative 4, in section 6.5 below.

In Inglewood, the LA Clippers also had some contact with the ownership of both the Hollywood Park Specific Plan (HPSP) site and The Forum site. These two sites are described and analyzed as Alternatives 6 and 7, respectively, in section 6.5 below.

The LA Clippers determined that the site at West Century Boulevard and South Prairie Avenue in the City of Inglewood would best meet the site criteria, given the proximity to existing and anticipated future fan bases, the potential for timely site assemblage and control with a substantial amount of vacant municipal-owned land, and the unique opportunity to be part of a world-class sports and entertainment district.

6.4 Alternatives Selected for Further Consideration

The City selected a reasonable range of alternatives to the Proposed Project for further consideration and analysis in this Draft EIR. Consistent with CEQA, the selection of the range of alternatives considered in this Draft EIR was governed by the rule of reason. As is stated in CEQA Guideline section 15126.6(a):

An EIR need not consider every conceivable alternative to a project. 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 which are infeasible.

In identifying a range of alternatives for consideration in this Draft EIR, the City focused on avoiding or substantially lessening one or more significant impacts of the Proposed Project, while achieving most of the basic objectives of the project, including construction and operation of a new entertainment and sports facility sufficient to serve as the home of the NBA LA Clippers. The selection of alternatives for this EIR is constrained by several factors, including the NBA requirements for the size of an arena, the proximity of the Project Site to other major sports and entertainment facilities, and access to major transportation corridors and freeways. As such, the focus of several of the selected alternatives is on an evaluation of the comparative environmental effects of alternative locations for development of the Proposed Project. In addition, the City has considered a project of reduced size on the same site, while still providing an arena sufficient to meet the NBA's requirements.

The alternatives to the Proposed Project analyzed in this Draft EIR are:

- Alternative 1: No Project Alternative;
- Alternative 2: Reduced Project Size Alternative;
- Alternative 3: City Services Center Alternative Site;
- Alternative 4: Baldwin Hills Alternative Site; and
- Alternative 5: The District at South Bay Alternative Site.
- Alternative 6: Hollywood Park Specific Plan Alternative Site
- Alternative 7: Forum Alternative Site

Table 6-1 summarizes the development assumptions for each of the alternatives, and **Figure 6-1** shows the geographic location of each alternative. Each of the alternatives is described in more detail and analyzed in the following subsections.

**TABLE 6-1
PROJECT ALTERNATIVES SUMMARY**

Project Elements	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
Arena size (sf / seats)	915,000 / 18,000	0 / 0	915,000 / 17,500	915,000 / 18,000	915,000 / 18,000	915,000 / 18,000	915,000 / 18,000	915,000 / 18,000
LA Clippers Team Offices (sf)	71,000	0	0	0	71,000	71,000	71,000	71,000
LA Clippers Team Practice and Training Facility (sf)	85,000	0	0	0	85,000	85,000	85,000	85,000
Sports Medical Clinic (sf)	25,000	0	0	0	25,000	25,000	25,000	25,000
Community Space (sf)	15,000	0	0	0	15,000	15,000	15,000	15,000
Commercial/Retail (sf)	48,000	0	0	48,000	48,000	48,000	48,000	48,000
Plaza Area (sf)	80,000	0	124,000	98,700	250,000	150,000	104,650	235,200
Onsite Parking (spaces)	4,125	0	3,775	4,125	4,060	8,000	1,045	4,125
Hotel (rooms)	150	0	0	0	0	0	0	0
Well Relocation (yes or no)	Yes	No	Yes	No	No	No	No	No

SOURCE: ESA, 2019.

6.5 Environmental Evaluation of the Alternatives

The following discussion provide a comparative evaluation of the environmental consequences of the alternatives selected for further consideration in this EIR. Consistent with the requirements of CEQA Guidelines section 15126.6(d), the discussion includes “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” The discussion of the comparative environmental impacts of each alternative is presented in a way to assist the reader in readily understanding which environmental impacts of an alternative would be the same or similar as, less severe than, or more severe than those of the Proposed Project. As provided for under CEQA, where an alternative would cause a significant impact that

would not otherwise be caused by the Proposed Project, the significant impact of the alternative is discussed, but in less detail than the significant impacts of the Proposed Project that are presented in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures.

Figure 6-1 Regional Location of Alternatives

In order to assist comparison of the impacts of the Proposed Project and the Alternatives, **Table 6-2**, at the end of this chapter, 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.

6.5.1 Alternative 1: No Project Alternative

Description

Under CEQA, the No Project Alternative must consider the effects of not approving the project. The No Project Alternative describes the environmental conditions that exist at the time that the environmental analysis commences, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved (CEQA Guidelines, section 15126.6 (e)(2)). In the case of the Proposed Project, the Project Site is partially developed, so continuation of existing conditions would involve continued operation of businesses and re-tenanting of current developed land uses on the Project Site. Existing conditions are described in the Environmental Settings of each section within Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, of this Draft EIR.

Under the No Project Alternative, the City Council would not approve any project on the Project Site, and none of the mitigation measures identified within this Draft EIR would be implemented. No demolition would occur under the No Project Alternative, because the existing structures on the site would be retained. The vacant parcels on the Project Site would continue to be vacant. The developed parcels on the Project Site would continue to be used, existing uses would continue, and those buildings that are currently vacant would be re-tenanted.

CEQA Guidelines section 15126.6(e)(3)(B) states that “[i]f disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed.” In this case, the Project Site is largely located within the IIBP Specific Plan, which calls for the development of light industrial and general commercial uses. The City adopted the IIBP Specific Plan in 1993. During the intervening 26 years, the development envisioned in the IIBP has not occurred. In light of the lack of development activity within the IIBP Specific Plan area over nearly three decades, it is not foreseeable that “predictable actions by others” would lead to development of the vacant parcels for uses consistent with the IIBP Specific Plan. Because these parcels have remained vacant for such a long time, and the City has not received any development applications for the vacant parcels, it is a reasonable assumption that no development of currently vacant parcels on the Project Site would occur within the foreseeable future. Although the IIBP would remain in place, development as contemplated by the IIBP would not occur.

Under the No Project Alternative, it is assumed that for the foreseeable future the LA Clippers would continue playing at the Staples Center in Downtown Los Angeles, and the LA Clippers’ team offices would continue to be located on Flower Street, within two blocks of Staples Center. In addition, the LA Clippers would continue to use its practice and training facility in the Playa Vista neighborhood within Los Angeles. It is also reasonable to assume that the LA Clippers

would either remain at Staples Center or seek an alternate location for the development of a new arena. While there is currently no identified alternate location under consideration, the discussion under Section 6.3.6 provides a description of the evaluation process previously undertaken by the LA Clippers, and the discussion under Alternatives 3, 4 and 5 provides a description of the 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 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 arena with further reduced capacity would be smaller than any other recently constructed arenas serving an NBA franchise.

An alternative that eliminates the arena, or includes an arena smaller than the minimum size required for an NBA franchise, would not meet a basic project objective. Alternative 2 would meet this basic project objective, while minimizing, to the extent feasible, impacts in the immediate vicinity of the Project Site. As such, under this alternative only the Arena, pedestrian plaza, and South Parking Garage would be constructed on the Arena Site. None of the other Proposed Project elements (i.e., team practice facility, sports medical clinic, and team administrative offices, retail shops and restaurants, outdoor plaza stage, and community-type uses) would be constructed. The LA Clippers' team offices would continue to be located on Flower Street within two blocks of Staples Center, while the LA Clippers would continue to use their practice and training facility in the Playa Vista neighborhood of Los Angeles. It should be noted that the environmental impacts of operation of these facilities in their current locations are included in the existing conditions, and would continue into the future under Alternative 2.

Under this alternative, the seating capacity of the arena would be reduced by approximately three percent to approximately 17,500 (up to 18,000 attendees in certain concert configurations), consistent with the seating capacity of the most recently built NBA arena (i.e., Fiserv Forum in Milwaukee, Wisconsin).² Without inclusion of team practice facility, sports medical clinic, and team offices, the arena structure would be further reduced in size. Furthermore, elimination of retail and community uses would mean that the pedestrian plaza would also be larger under this alternative as compared to the Proposed Project.

Parking provided under Alternative 2 would comply with parking supply requirements established in the Inglewood Municipal Code, section 12-47, which require provision of parking spaces at a ratio of 1 space per 5 attendees. With a total capacity of 18,000 attendees at the arena, this alternative would require a minimum of 3,600 parking spaces. Alternative 2 would provide 3,775 onsite parking spaces, slightly more than required by the Municipal Code, compared to the 4,125 onsite parking spaces provided by the Proposed Project. The West Parking Garage would be constructed with 3,110 spaces across six stories, the same as under the Proposed Project. In addition, the proposed Prairie Avenue pedestrian bridge linking the West Parking Structure to the plaza on the Arena Site would still be included. Similar to the Proposed Project, the South Parking Garage would be located immediately to the south of the arena on the Arena Site, providing 625 parking spaces across three stories, a decrease from 800 spaces on four floors under the Proposed Project.

² Wikipedia, List of National Basketball Association arenas, accessed July 7, 2019, https://en.wikipedia.org/wiki/List_of_National_Basketball_Association_arenas.

Under Alternative 2, on the East Transportation and Hotel Site, no parking structure nor public parking use would be provided; the site would only serve buses, Transportation Network Company (TNC) vehicles and taxis via a surface parking and pickup/drop-off lot. Further, under this alternative no hotel would be constructed on the Hotel Site, a decrease in the size of the Project Site of 1.25 acres, or about 4.5 percent.

Finally, construction of the proposed replacement well on the Well Relocation Site would take place under Alternative 2.

Under Alternative 2, employment on the Project Site would be reduced because the LA Clippers would not move their team offices and practice facility to the Project Site, and the sports medicine, hotel, retail/restaurant, and community uses would be eliminated. In total, this would reduce the employment on the Project Site from 768 under the Proposed Project to 75 under Alternative 2. Event-related employment would remain the same as under the Proposed Project.

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 2.

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

Aesthetics

Although a number of uses would be removed from the Proposed Project, many of the impacts of the Proposed Project on environmental resources affected by the size and location of the Project Site would be either the same, or nearly so. Alternative 2 would include the Arena Structure and West Parking Garage essentially as proposed under the Proposed Project, including the South Prairie Avenue pedestrian bridge. As such, aesthetic impacts to views north and south on South Prairie Avenue would remain unchanged. There would be a modest reduction in the amount of development visible to motorists on West Century Boulevard due to the elimination of the hotel development on the East Transportation Site and the elimination of the plaza development on the Arena Site, however the larger structures that would remain, including the Arena Structure and the West Parking Garage, would continue to be visually present in views east and west on West Century Boulevard (Impact 3.1-1). Finally, impacts related to spillover lighting at nearby residential structures would remain essentially the same as under the Proposed Project (Impacts 3.1-2 and 3.1-5), with the same required mitigation measures.

Biological Resources

Because the same tree removal would occur under Alternative 2 as under the Proposed Project, impacts related to disturbance to nesting raptors or migratory birds (Impact 3.3-2) and loss of protected trees (Impacts 3.3-3) would be identical to those described for the Proposed Project, with the same required mitigation measures.

Cultural and Paleontological Resources

Because the Project Site would be essentially the same as under the Proposed Project, the construction impacts of Alternative 2 that are related to demolition, ground-disturbance and excavation would be similar to the Proposed Project although lessened by approximately 4.5 percent as there would be no ground disturbance associated with the planned hotel on 1.25 acres of the East Transportation Site under Alternative 2. Therefore, damage to unknown historical resources, archaeological resources, 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) would be reduced, but would still require mitigation.

Hazards and Hazardous Materials

Impacts related to the transport, handling, and disposal of hazardous materials would remain essentially the same as under the Proposed Project (Impact 3.8-1), with adherence to the same federal, State and local regulations. There would be a decrease in the numbers and types of businesses on the Project Site under Alternative 2, but these decreases would be insufficient to change the conclusions about significance or the requirement for adherence to federal, State and local regulations. In addition, exposure to contaminated soils (Impact 3.8-4) under Alternative 2 would be reduced by approximately 4.5 percent as there would be no ground disturbance associated with the planned hotel on 1.25 acres of the East Transportation Site, but mitigation would still be required. Finally, hazards to air navigation (Impact 3.8-5) under Alternative 2 would be the same as the Arena Structure and the construction cranes required to construct the arena would be the same height as with the Proposed Project, and thus would penetrate imaginary airspace surfaces set by the FAA for LAX; the same mitigation would be required.

Hydrology and Water Quality

Impacts of Alternative 2 associated with soil erosion during construction and storm water drainage post-construction would also be similar to the Proposed Project but somewhat lessened as the planned hotel on the East Transportation and Hotel Site would not be constructed under Alternative 2. As a result of the site being reduced in size by about 1.25 acres, impacts related to degradation of water quality during construction and post-construction (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4) and inadequate site drainage (Impacts 3.9-3 and 3.9-6) would be reduced by about 4.5 percent, but would still require mitigation.

Land Use and Planning

Like the Proposed Project, Alternative 2 would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

Noise

Traffic noise impacts of Alternative 2 would be essentially unchanged under Alternative 2. Under normal conditions, a doubling of traffic generates an increase in ambient noise of about 3 dB. Reciprocally, it would take a reduction of about 50 percent to result in a noticeable change in the noise impacts of the project. As reported below, this alternative would result in a reduction in

traffic of about 3 percent. Thus, traffic noise effects of Alternative 2 would be the same as those of the Proposed Project (Impacts 3.11-2 and 3.11-6).

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 three 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).

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).

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.

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 three percent. There would be a corresponding decrease in criteria pollutant emissions, localized maximum daily operational emissions (NO₂), 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 (NO₂) (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.

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 three 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 three 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.

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.

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. As described in Table 3.13-9, 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 Proposed Project.

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 uses (Impacts 3.14-10, 3.14-26, 3.14-36, and 3.14-45).

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.

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

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

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 complimentary 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.

The Reduced Project Size Alternative would also meet some but not all of the Project Applicant's objectives for the Proposed Project. Under this alternative the arena would have 500 fewer seats than identified in Applicant Objectives 1a and 1d. In addition, the Project Applicant's goal of consolidating team facilities (Applicant Objective 1c) and providing complementary retail

(Project Applicant Objective 1e) would also not be met under the Reduced Project Size Alternative, as no team facilities and retail development would be provided. The elimination of retail and hotel uses under this alternative would be less responsive to meeting the intent of Applicant Objective If related to providing public benefits such as opportunities for youth- and community-oriented programs and increasing revenues by property and sales taxes and potential transient occupancy taxes. Finally, the absence of a complementary uses such as a team practice facility, sports medical clinic, team offices, retail and public uses under this alternative would fail to meet Applicant Objectives 2 and 2d.

6.5.3 Alternative 3: City Services Center Alternative Site

Description

Under Alternative 3, key elements of the Proposed Project would be developed on a site in Downtown Inglewood, located approximately 1.5 miles northwest of the Project Site (see **Figure 6-2**). The focus of this alternative is to identify the impacts that would occur if the arena and as much of the other elements of the Proposed Project as feasible are developed at another site within the City of Inglewood that is not as proximate to The Forum and the NFL Stadium, as a means of avoiding or lessening the traffic and related impacts of concurrent events at these facilities. The City determined that there is one such site that may meet these criteria and provides sufficient land to accommodate the arena, some parking, and plaza uses potentially available.

Figure 6-2 Alternative 3 - City Services Center

Specifically, Alternative 3 would be located on an approximately 9.7-acre site that encompasses the majority of a block bound by West Beach Avenue on the north, West Ivy Avenue on the east, Cable Place and the future Crenshaw/LAX light rail right-of-way on the south, and North Eucalyptus Avenue on the west. The Alternative 3 site is presently occupied by a City-owned corporation yard, known as the Inglewood City Services Center, and a firefighter training academy owned and operated by El Camino College. One existing building on the Alternative 3 site includes ground-level maintenance bays for vehicle and equipment maintenance, uncovered parking and a fuel island on the second floor accessible from Cable Place to the south of the site, and three floors of office space. Uncovered parking and material stockpiles and storage areas are also present in the City Services Center. Facilities on the firefighter training academy portion of the site include a classroom building, practice tower, and a “burn” building.

Regional access to the Alternative 3 site is provided by the San Diego Freeway (I-405), located approximately 0.6 miles to the west, and the Glenn Anderson Freeway & Transitway (I-105), located 2.3 miles to the south. Interstate 405 is located about 0.7 miles closer to the City Services Center Alternative site than to the Project Site, while I-105 is located about three times as far from the City Services Center Alternative site (2.4 miles) than from the Project Site (0.8 miles). Local access to the City Services Center Alternative site is provided by several major arterials, including Florence Avenue and La Brea Avenue, which serve the area near the City Services Center site. Transit access to the City Services Center Alternative site is provided by several bus lines and the future Crenshaw/LAX light rail line. The closest bus stop to the City Services Center Alternative site is a block north along North La Brea Avenue, and the nearest light rail station to the City Services Center Alternative site is about one quarter mile to the east along Florence Avenue. The Alternative 3 site is located approximately 1.5 miles northwest of The Forum, and approximately 2 miles northwest of the site of the NFL Stadium.

Uses in the immediate vicinity of the City Services Center Alternative site include the Marvin Engineering Company industrial complex north and adjacent to the City Services Center site, manufacturing and single family residential uses to the north across West Beach Avenue and manufacturing and warehouse uses to the east across Ivy Avenue. There are also churches to the west of the site across North Eucalyptus Avenue. With the exception of a three-story structure along West Beach Avenue, all of the remaining uses to the north and east of the site are located in one-story structures, including three single family homes on the north side of West Beach Avenue, east of West Hazel Street. An electrical substation is located across the future Crenshaw/LAX light rail line right-of-way to the south and a single-story commercial wholesale building is located to the south across Cable Place. The City’s Sanford M. Anderson Water Treatment Plant is located to the west across North Eucalyptus Avenue.

The City Services Center Alternative site and the surrounding area are designated Downtown Transit-Oriented Development (TOD) in the City of Inglewood General Plan. The City Services Center Alternative site and the area to the north, east, and south of the site is zoned MU-2, TOD Mixed Use 2, while the area to the west of the site is zoned O-S, Open Space.

Alternative 3 would involve the demolition of the facilities that presently occupy the City Services Center and firefighter training academy areas and the construction of an arena and parking structures that would open to a pedestrian plaza that would include an outdoor stage (see Figure 6-2). Similar to the Proposed Project, the arena under this alternative would have a capacity of 18,000 attendees in an NBA basketball configuration, and up to 18,500 in certain concert configurations. The arena would be located on the southeast portion of the site while Parking Structure A would be situated on the southwestern portion of the site and Parking Structures B and C would be situated on the northeastern portion of the site. Access to the arena would be provided on West Beach and North Eucalyptus avenues via a pedestrian plaza. Parking Structure A would be accessed from North Eucalyptus Avenue while Parking Structures B and C would be accessed from West Beach Avenue. In addition, approximately 48,000 square feet of ground floor retail oriented towards the pedestrian plaza would be provided on the lower level of Parking Garages A and B and along the northwestern border of the site.

The proposed parking structures on the City Services Center Alternative site would include 4,215 parking spaces, which is the same amount of parking provided by the Proposed Project. In addition, offsite parking for events at the arena would be provided by an existing parking structure owned and operated by the Faith Central Bible Church. The existing structure is located approximately 800 feet to the southwest of the Project Site along Florence Avenue and would provide up to 860 additional parking spaces.

At 9.7 acres, the Alternative 3 site would be approximately 35 percent of the size of the Project Site. As a result, none of the other team facilities proposed by the Proposed Project (e.g., team practice facility, sports medical clinic, and team offices) would be constructed under Alternative 3 as the site is not of sufficient size to accommodate the additional square footage. The LA Clippers' team offices would continue to be located on Flower Street within two blocks of Staples Center while the LA Clippers would continue to use their practice and training facility in the Playa Vista neighborhood of Los Angeles. In addition, this alternative would not include a hotel or a new potable water well because existing uses would remain in their existing locations on the Project Site.

Finally, under Alternative 3, all of the uses that presently occupy the City Services Center and the firefighter training academy would be relocated to the Arena Site along Century Boulevard. Unlike the Proposed Project, the relocation of these uses would not require the vacation of either West 101st Street or West 102nd Street. In addition, these uses would only require approximately 10 acres of the Arena Site.

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 3. In addition, the comparative analysis of environmental effects provided below was informed by the Downtown Inglewood and Fairview

Heights Transit Oriented Development (TOD) Plan Program EIR⁴, which provided information relating to existing conditions in and around the City Services Center site.

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

Although the size of the City Services Center Alternative site is only about 35 percent of the size of the Project Site, Alternative 3 also involves relocation of uses from the City Services Center Alternative site to the Project Site, and thus a number of impacts would be similarly likely to occur despite the reduced size of the site for the construction of the Proposed Project.

Aesthetics

Like the Proposed Project developed at the Project Site, Alternative 3 would introduce more intensive and dense uses than current development at the City Services Center site. At this location, there are limited long-range views to be affected by the larger structures that would be developed under this alternative (Impact 3.1-1). Like at the Project Site, there are a few residences in close proximity to the City Services Center site. As a result of the rather low intensity of use along West Beach Avenue, it is likely that nighttime light levels at the existing homes that are across the street from this site are less than two foot-candles at the property line. 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 (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

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

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.

Hazards and Hazardous Materials

A known Leaking Underground Storage Tank (LUST) is located approximately 0.14 miles to the southwest of the City Services Center Alternative site and a petroleum spill occurred approximately 100 feet to the south of the site.⁸ It is possible that releases from these sites may have migrated to the City Services Center site. In addition, the presence of a fuel island and ongoing vehicle and equipment maintenance activities in the service bays could indicate that unknown soil contamination may be present on the City Services Center site. Furthermore, as discussed in Section 3.8, Hazards and Hazardous Materials, unknown soil contamination may be present on the Arena Site given its land used history and the results of soil testing. As a result of these conditions at the City Services Center site, under Alternative 3, as with the Proposed Project, it is possible that construction workers could be exposed to contamination during ground disturbing activities (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. For this reason, impacts related to on-site contamination would be similar to those described for the Proposed Project.

Hydrology and Water Quality

The City Services Center Alternative site is fully developed with impervious surfaces; pervious surfaces on the site are minimal and include ornamental landscaping. Sheet flow stormwater runoff on the City Services Center Alternative site is managed by an existing system of storm drains. Further, the site is bisected, east-to-west, by a drainage that is encased in a below-grade culvert and would be required to be relocated as part of development of the site. In addition, as

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.

⁸ State Water Resources Control Board, 2019. Geotracker database. Accessed: May 9, 2019.

discussed in Section 3.9, Hydrology and Water Quality, the Arena Site is partially developed with large portions of previously development but now vacant land.

As a result, it is possible that construction and operation of Alternative 3 could cause water quality discharges that are not consistent with SWRCB objectives and could degrade the quality of the water that is discharged from the City Services Center Alternative site (due to arena development) and the Arena Site (due to the relocation of the City Services Center land uses) (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). Altered drainage patterns during both construction and operation on both sites, including the realignment of the below-grade drainage culvert bisecting the City Services Center site, would also have the potential to result in erosion, sedimentation, and/or flooding on or offsite by redirecting or concentrating flows (Impact 3.9-3 and 3.9-6). In order to lessen the significance of these impacts for Alternative 3, like the Proposed Project, Mitigation Measure 3.9-1(a) would require the project to comply with a number of regulations governing water quality and drainage while Mitigation Measure 3.9-1(b) would require the periodic sweeping parking lots during operation to remove contaminates. As a result, impacts related to water quality and drainage would be similar to the Proposed Project.

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).

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 acre) 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 (NO₂) (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.

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.

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. As described in Table 3.13-9, 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 Proposed Project.

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.

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).

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

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

project would also meet the City’s goal of encouraging public transit opportunities (City Objective 6). However, the elimination of the team practice facility, sports medical clinic, and team offices 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 3 would be less responsive to City Objective 8 because it would be less environmentally conscious than the Proposed Project.

The City Services Center Alternative would also meet some, but not all, of the Project Applicant’s objectives for the project. Because constructing on the City Services Center Alternative site would first require designing and constructing replacement uses on the Project Site, it is uncertain if this alternative site would allow the applicant to begin hosting LA Clippers home games in the 2024-2025 season, and thus could be unable to meet Project Applicant Objective 1a. The project under this alternative would not meet the Project Applicant’s goal of consolidating team facilities on one site (Project Applicant Objective 1b) as the team practice facility, sports medical clinic, and team offices would continue to be located in Downtown Los Angeles and Playa Vista, respectively. In addition, the project would only partially meet the Project Applicant’s goal of contributing to the economic and social well-being of the community as the elimination of the hotel under the City Services Center Alternative would result in the loss of revenue from transient occupancy taxes (Project Applicant Objective 1f). Next, as the City Services Center Alternative site would be approximately 35 percent of the size of the Project Site, and thus would provide fewer amenities, the project would not be as competitive with other major entertainment venues as it would be on the Project Site, and it would not provide sufficient complementary on-site uses to sustain the project on non-event days (Project Applicant Objectives 2b and 2d). Finally, the project would not be located on a site near other similar uses (i.e. the future stadium) within the HPSP area under the City Services Center Alternative. As a result, the proposed project would not combine with the future stadium to create a dynamic, year-round sports and entertainment district destination in the southwestern portion of the City (Project Applicant Objective 3a).

6.5.4 Alternative 4: Baldwin Hills Alternative Site

Description

Under Alternative 4, the Proposed Project would be developed at the site of the existing Baldwin Hills Crenshaw Plaza shopping mall, located approximately 4.5 miles north of the Project Site in the Baldwin Hills neighborhood of the City of Los Angeles (see **Figure 6-3**). The focus of this alternative is to identify the impacts that would occur if the arena and related development were to be constructed and operated at another site that is located, if not within the City of Inglewood, then in the same general vicinity within the region, but not as proximate to The Forum and the NFL Stadium, as a means of avoiding or lessening the traffic and related impacts of concurrent events at these facilities. Because the vicinity around Inglewood is largely developed, available sites that may meet these criteria and be of sufficient size to accommodate the arena and other project elements are limited. The City determined that there is such a site located in the vicinity of Baldwin Hills neighborhood.

The Baldwin Hills Crenshaw Plaza shopping mall is approximately 43 acres in size and is bounded by West 39th Street on the north, Crenshaw Boulevard on the east, Stocker Street on the southeast, Santa Rosalia Drive on the southwest, and Marlton Avenue on the west. The mall is also bisected into two parcels by Martin Luther King Jr. (MLK) Boulevard: a northern parcel consisting of approximately 11 acres and a southern parcel consisting of 32 acres. The Baldwin Hills Alternative site is located on a large portion of the 32-acre southern parcel of the mall.

Figure 6-3 Alternative 4: Different Location - Baldwin Hills

Under existing conditions, the Baldwin Hills Alternative site includes approximately 791,650 square feet of commercial retail, restaurant, and entertainment uses. These uses include anchor stores such as Sears; mall stores; restaurants; a theater; a bank; and two parking structures. The existing Cinemark Theaters and mall stores on the site would remain. All other uses, including the Sears store and automotive center would be demolished and cleared for construction of the Alternative 4 uses. None of the uses on the northern parcel would be disrupted, and the viaduct that crosses West Martin Luther King Jr. Boulevard would remain.

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 Santa Monica Freeway (I-10), located approximately 1.6 miles to the north, the Harbor Freeway (I-110), located about 3.1 miles to the east, and the San Diego Freeway (I-405), located approximately 3.5 miles to the west. Local access to the Baldwin Hills Alternative site is provided by Crenshaw Boulevard and West Martin Luther King Jr. Boulevard. The Baldwin Hills Alternative site is also accessible by transit via bus and the future Crenshaw/LAX light rail line. The closest bus stop to the Baldwin Hills Alternative site will be located immediately adjacent to the site, at the intersection of Crenshaw Boulevard and MLK Boulevard, while the nearest light rail station is located immediately adjacent to the site along the west side of Crenshaw Boulevard, south of MLK Boulevard.

The Baldwin Hills Alternative site is located adjacent to the Crenshaw Commercial Corridor and is mostly surrounded by commercial uses with low and medium density residential uses located to the southwest, south, and east. Land uses to the north consist of retail uses located across MLK Boulevard on the mall's 11-acre northern parcel while land uses to the east include single-story commercial uses and associated parking. To the east, along Crenshaw Boulevard between West MLK Jr. Boulevard and West Stocker Street, land uses are commercial for one parcel deep, and then single family residential further east. Land uses to the southeast across Stocker Street include single-story commercial uses, two-story multifamily uses, and one-story single family residential uses. Land uses to the southwest along Santa Rosalia Drive include various mid-rise residential and office uses including a four-story medical office building, six-story condominium building, a church and preparatory academy, and a community recreational facility (YMCA). Land uses to the west along Marlton Avenue include a large three-story Kaiser Permanente medical office building surrounded by parking.

The Baldwin Hills Alternative Site is designated Regional Commercial Center, and is located in the West Adams-Baldwin Hills-Leimert Community Plan area. Land uses surrounding the Baldwin Hills Alternative site within the City of Los Angeles are designated by the West Adams-Baldwin Hills-Leimert Community Plan as Regional Commercial Center to the north, Community Commercial and Neighborhood Commercial to the east, Community Commercial to the southeast, and Regional Center Commercial to the west. With respect to zoning, the Baldwin Hills Alternative site is designated Commercial (C2). Land uses surrounding the Baldwin Hills alternative site within the City of Los Angeles are zoned as Commercial (C2) to the north; Limited Commercial (C1) to the east; Commercial (C2) to the southwest; and Commercial

(C2) to the west. Land uses within unincorporated Los Angeles County to the southeast are zoned Multiple Dwelling Unit Residential (R3).

A plan to modernize and redevelop the existing Baldwin Hills Crenshaw Plaza shopping mall was approved by the City of Los Angeles in 2018. The plan calls for the demolition of approximately 13,400 square feet of retail/restaurant space and the construction of about 44,200 square feet of retail/restaurant space, a 400-room hotel, and 410 apartment units on the Baldwin Hills Alternative site; the existing mall buildings and theater would remain. The project has yet to be developed.

Alternative 4 would involve the demolition of the Sears store, the east parking structure along Crenshaw Boulevard, and smaller commercial and retail outbuildings along Stocker Street, Santa Rosalia Drive, and Marlton Avenue. The former Walmart store at the corner of Crenshaw Boulevard and West MLK Jr. Boulevard, the main mall structure (including bridge structure), and Cinemark movie theater would remain. In addition, the west parking structure along Marlton Avenue would either be expanded or replaced under this alternative.

Similar to the Proposed Project, the arena under Alternative 4 would have a capacity of 18,000 attendees in an NBA basketball configuration, and up to 18,500 in certain concert configurations. In addition, a team practice facility, sports medical clinic, team offices, and retail uses would be included under this alternative. The square footage of each of these uses would remain the same as under the Proposed Project. This alternative would not include a hotel or a new potable water well because such uses would not be removed in order to accommodate the Arena Structure. Approximately 4,060 onsite parking spaces would be provided in two parking structures, slightly less than the 4,125 onsite parking spaces that would be provided in the Proposed Project. Onsite parking would be provided in the expanded or new four-level 2,100-space Parking Structure A that would be accessed from Marlton Avenue and a new four-level, 1,960-space Parking Structure B would be constructed along Stocker Street.

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 4. The comparative analysis of environmental effects provided below was informed by the 2016 Baldwin Hills Crenshaw Plaza Master Plan Project EIR (Master Plan EIR),¹⁰ that contained information relating to existing conditions in and 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

¹⁰ City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016.

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.

Hazards and Hazardous Materials

Past soil contamination on the Baldwin Hills Alternative site has either been remediated or does not pose a concern to individuals and/or the environment.¹¹ However, it is possible that previously contaminated soils may still remain on the Baldwin Hills Alternative site, and thus, as with the Proposed Project, construction workers could be exposed to contamination during ground disturbing activities (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,

¹¹ City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.F-10.

which would reduce the potential for worker exposures. For this reason, impacts related to on-site contamination would be similar to the Proposed Project.

Hydrology and Water Quality

The Baldwin Hills Alternative site is fully developed with impervious surfaces; pervious surfaces on the site are minimal and include ornamental landscaping. Surface water runoff from the Baldwin Hills Alternative site is directed into an extensive storm drain collection system that serves the area. Similar to the Proposed Project, it is possible that construction and operation of Alternative 4 could degrade the quality of the water that is discharged from the Baldwin Hills Alternative site (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). In addition, as with the Proposed Project, altered drainage patterns on the Baldwin Hills Alternative site during both construction and operation have the potential to result in erosion, sedimentation, and/or flooding on or offsite by redirecting or concentrating flows (Impact 3.9-3 and 3.9-6). Mitigation Measure 3.9-1(a) would require the project at the Baldwin Hills Alternative site to comply with a number of regulations governing water quality and drainage while Mitigation Measure 3.9-1(b) would require the periodic sweeping of parking lots during operation to remove contaminants. As a result, impacts related to water quality and drainage would be similar to those described for the Proposed Project.

Land Use and Planning

Like the Proposed Project, Alternative 4 would not result in the division of an established community, as the arena and other uses would be located entirely within the southern parcel of the Baldwin Hills-Crenshaw Plaza mall; the vacation of streets would not be required. Alternative 4 would likely require an amendment to West Adams-Baldwin Hills-Leimert Community Plan. With the amendment, Alternative 4 would be consistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus it would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

Noise and Vibration

Construction vibration levels under Alternative 4 would be similar to the Proposed Project due to the use of similar amounts of equipment and construction methods. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-6) would be the same and 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.

Population, Employment and Housing

According to the Master Plan EIR, development under the Baldwin Hills Crenshaw Plaza Master Plan would result in a net increase of 1,760 employees on the site. However, these new jobs would be accommodated by unemployed workers in the area.¹² Similar to the Proposed Project, Alternative 4 would add 768 employees to the Baldwin Hills Alternative site, which is less than half the number that would be added under the Master Plan. As a result, these new jobs would

¹² City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.J-11.

also be accommodated by unemployed workers in the area. In addition, as no housing is located on the Baldwin Hills Alternative site, Alternative 4 would not result in the displacement of substantial numbers of people or housing. For these reasons, impacts related to population, employment, and housing (Impacts 3.12-1 through 3.12-4) under Alternative 4 would be similar in magnitude to the Proposed Project.

Public Services

Fire protection services at the Baldwin Hills Alternative site is provided by the City of Los Angeles Fire Department (LAFD) and police protection services are provided by the Los Angeles Police Department (LAPD). There are multiple fire stations that provide service to the project site, including Station Nos. 94, 34, and 66, which the LAFD has indicated that the response times and distances to the Project Site from Station 94 and Station 34 currently meet LAFD standards.¹³ The Baldwin Hills Alternative Site is located within the LAPD's South Bureau, and is served by the Southwest Community Police Station, located at 1546 West Martin Luther King Jr. Boulevard.¹⁴ With the implementation of a series of Regulatory Compliance Measures and Project Design Features required of new projects in the City of Los Angeles, the Proposed Project built and operated at the Baldwin Hills Alternative site would have a less than significant impact on the provision of fire and police protection services (Impacts 3.13-1 through 3.13-4). This impact would be similar in magnitude to the impact at the Project Site.

Because the Proposed Project does not include residential uses, it would not adversely affect City of Los Angeles parks and recreation facilities or Los Angeles Unified School District elementary, middle, and high schools (Impacts 3.13-5 through 3.13-12). Thus, these impacts would be the same as with the Proposed Project.

Transportation and Circulation

Under Alternative 4, the ability to walk to the Crenshaw/LAX light rail line Martin Luther King Jr. 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. The removal of a portion of the 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. 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

¹³ City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.K.1-2.

¹⁴ City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. p. IV.K.2-2.

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).

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), LADWP, 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 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

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

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.

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 (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 (NO₂) (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.

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.

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 (Impacts 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 two 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.

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

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, 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 three 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

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.

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 range from about 61 to 69 dBA Leq at the Baldwin Hills Alternative site,²⁰ compared to a range of approximately 64 to 71 dBA Leq at the Project Site (see Table 3.11-1). While traffic noise generators are similar in character, the Baldwin Hills Alternative site area lacks proximity to aircraft noise as is the case at the Project Site.

Noise levels under generated by construction and operation of Alternative 4 would be similar to the Proposed Project and sensitive receptors along Stocker Street to the south, across Crenshaw Boulevard to the east, across Santa Rosalia Drive to the west-southwest, and across West MLK Jr. Boulevard to the northwest of the Baldwin Hills Alternative site would be subjected to the same noise levels as sensitive receptors near the Project Site during construction and operation; these receptors would be located similar distances as sensitive receptors near the Project Site from construction activity, nearby roadways, and arena plaza activities. Therefore, while temporary increases in noise during construction and permanent increases in noise during operation (Impacts 3.11-1, 3.11-2, 3.11-5, and 3.11-6) would be of similar magnitude, the fact that the Baldwin Hills Alternative site area is generally quieter than the Project Site vicinity would result in more severe impacts with Alternative 4 than under the Proposed Project. Development under Alternative 4

²⁰ City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. Table IV.I-3, p. IV.I-7.

would still be required to implement Mitigation Measure 3.11-1, which requires 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 requires the implementation of a transportation demand management (TDM) program (Mitigation Measure 3.14-2(b)).

Transportation and Circulation

The amount of on-site parking under Alternative 4 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 potentially be accommodated in the evenings in the parking lot for the medical office building across Marlton Avenue to the northwest or in other small lots in the area. However, this is likely to be insufficient, and event spillover parking onto nearby residential streets could be a significant impact.

Three of the streets surrounding the Alternative 4 site are identified in the City of Los Angeles *Mobility Plan 2035* for future bicycle improvements: Crenshaw Boulevard is on the Bicycle Lane Network identified for Tier 2 Bicycle Lanes, Martin Luther King, Jr. Boulevard is on the Bicycle Enhanced Network identified for Tier 1 Protected Bicycle Lanes, and Santa Rosalia Drive is on the Neighborhood Enhanced Network. 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.

Utilities and Service Systems

At the Project Site, wastewater flows could be accommodated with several limited off-site improvements to increase capacity in local lines. At the Baldwin Hills Alternative site, the 12-inch sewer line under Marlton Avenue has a remaining flow capacity of 0.28 MGD; the capacity of the sewer under Crenshaw Boulevard is unknown.²¹ The estimated peak wastewater flow from the Proposed Project development would be approximately 0.70 MGD, more than double the known capacity of lines serving the site. Thus, infrastructure upgrades would be needed to allow the local wastewater infrastructure adjacent to the Project Site to serve the Proposed Project at the Baldwin Hills Alternative site. The construction of these infrastructure improvements could cause noise, traffic disruption, and other environmental effects associated with sewer line upgrades. This impact would be more severe than at the Project Site.

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 Inglewood. Because the Baldwin Hills Alternative Site is located in the City of Los Angeles and

²¹ City of Los Angeles, 2016. *Baldwin Hills Crenshaw Plaza Master Plan Project EIR*. November 2016. Table IV.I-3, p. IV.M.1-11.

not in the City of Inglewood, none of the City of Inglewood’s objectives for the Project would be met under Alternative 4.

The Baldwin Hills Alternative Site would meet most but not all of the Project Applicant’s objectives for the project. Because the Baldwin Hills Alternative site would first require acquiring the site, and then designing and approving the project through the City of Los Angeles, it is uncertain if this alternative site would allow the applicant to begin hosting LA Clippers home games in the 2024-2025 season, and thus could be unable to meet Project Applicant Objective 1a. While a state-of-the-art multi-purpose basketball and entertainment center (Project Applicant Objective 1a) along with team facilities (Project Applicant Objective 1c) and retail uses (Project Applicant Objective 1e) would be constructed under the Baldwin Hills Alternative, it would not combine with the future NFL Stadium to create a dynamic, year-round sports and entertainment district destination in the southwestern portion of Inglewood (Project Applicant Objective 3a).

6.5.5 Alternative 5: The District at South Bay Alternative Site Description

Under Alternative 5, the Proposed Project would be developed at a site in the City of Carson approximately 8 miles southeast of the Project Site (see **Figure 6-4**). The focus of this alternative is to identify the impacts that would occur if the arena and related development are located at

Figure 6-4 Alternative 5: Different Location - Carson

another site that is, if not proximate to the City, then at a site that has previously been considered for a sports and entertainment facility. The City has determined that there is such a site located in the City of Carson. One key aim of this alternative is to determine whether such a site exists that would locate the arena at a site that is not as proximate to The Forum and the NFL stadium, as a means of avoiding or lessening the traffic and related impacts of concurrent events at these facilities. The City has determined that Alternative 5 may meet these criteria. There is some question regarding whether this site would meet the project applicant's objective to "[l]ocate a basketball and entertainment center on a site that is geographically desirable and accessible to the LA Clippers' current and anticipated fan base." Based on available information, however, this alternative appears to be potentially feasible.

Specifically, the Proposed Project would be located on a portion of a 157-acre site known as The District at South Bay, located west of the San Diego Freeway (I-405) and south of Del Amo Boulevard. The site is a former Class II landfill that is currently undergoing remediation and closure. The site is mostly vacant and is covered with nonnative grasses with the exception of the eastern portion of the site adjacent to the I-405, where a 711,500-square-foot regional commercial center is presently being constructed. Other existing facilities on the site include groundwater and landfill gas treatment facilities, and subsurface facilities to assist with dispersion of landfill gases. Construction trailers and equipment are also located in the northwestern portion of the site; soil and material stockpiles and construction materials are stored in various locations on the site.²²

Regional access to the site would be provided by the San Diego Freeway (I-405), immediately adjacent to the east, Harbor Freeway (I-110 Freeway), approximately 0.5 miles to the west, Artesia Freeway (SR-91 Freeway), about 1.9 miles to the north, and Long Beach Freeway (I-710 Freeway), approximately 3.4 miles to the east. Overall, these regional highway facilities are located closer to the Alternative 5 site than the regional highway facilities that serve the Proposed Project. Local access to the site is provided by Del Amo Boulevard, Avalon Boulevard, and Main Street. Transit at the Alternative 5 site includes bus service provided by the City of Carson's bus system, Carson Circuit, which provides connections to the Metro Blue Line and regional bus services from Torrance Transit, the MTA, Long Beach Transit and Gardena Municipal Bus Lines. The nearest bus stop is located at the intersection of Del Amo Boulevard and Main Street, located adjacent to the northwest corner of the project site, and multiple bus lines running north-south along Avalon Boulevard. The nearest light rail station is the Metro Blue Line station at Del Amo Boulevard, about 3.5 miles east of the site.

The Alternative 5 site is surrounded by multiple land uses. Uses to the east across the I-405 include residential neighborhoods and regional retail, most notably the South Bay Pavilion at Carson. To the north of the site is the Porsche Experience Center, a 6.5-kilometre test and development auto racetrack, a racing car exhibition, and a restaurant. To the northeast is the Victoria Golf Course. Residential areas, consisting of one- and two-story detached residences and manufactured homes, are located to the south and west. The residences are separated from the

²² City of Carson, 2018. *The District at South Bay Specific Plan EIR*. March 2018, p. II-8.

Alternative 5 site by the Torrance Lateral Flood Control Channel (Torrance Lateral), a concrete-lined drainage channel which parallels the southern and western border of the site. To the west of the site, extending away from the site on West Torrance Boulevard and Del Amo Boulevard, are low-rise commercial and light industrial uses.

The site is designated Mixed Use – Residential in the City of Carson General Plan and designated Mixed-Use Marketplace (MU-M) and Commercial Marketplace (CM) in The District at Southbay Specific Plan. Land uses surrounding the project site are designated by the City of Carson General Plan as Mixed Use – Residential and Mixed Use – Business Park to the north, Regional Commercial to the east, Low Density Residential and High Density Residential to the south, and Low Density Residential to the west. With respected to zoning, land uses surrounding the project site are zoned regional commercial to the north and east, and single-family and multi-family residential to the south and west.

In 2006, the City of Carson adopted the Carson Marketplace Specific Plan, which proposed constructing a 1,995,125-sf mixed-use commercial project (retail, 300 hotel rooms, and entertainment uses) and 1,550 residential units. In 2011, the specific plan was amended and renamed “The Boulevards at South Bay Specific Plan.” In 2015, the specific plan area was proposed for the development of an NFL Stadium that would have served as the home for the San Diego Chargers and Oakland Raiders franchises. Ultimately this site was not selected, and the Chargers relocated to Los Angeles with the intent to play games at the new NFL Stadium under construction in Inglewood, and the Raiders decided to relocate to a new stadium currently under development in Las Vegas.

In 2018, the specific plan was further amended to allow for regional commercial uses and renamed “The District at South Bay Specific Plan.” Under the current proposal, the 157-acre site would be developed with a total of 1,250 residential units and 1,834,833 square feet of commercial uses including approximately 711,500 square feet of regional commercial uses, including outlet and restaurant uses, and 890,000 square feet of regional retail center, neighborhood-serving commercial, restaurant, and commercial recreation/entertainment uses, as well as 350 rooms total in two hotels. As discussed above, the 711,500-square-foot regional commercial center (Los Angeles Premium Outlets) is under construction on the approximately 30-acre eastern portion of the specific plan area, adjacent to the I-405.

As with the Proposed Project, the Alternative 5 arena would have a capacity of 18,000 attendees in an NBA basketball configuration, and up to 18,500 in certain concert configurations. In addition, this alternative would include a team practice facility, sports medical clinic, team offices, and retail uses. The square footage of each of these uses would remain the same as under the Proposed Project. Approximately 8,000 surface parking spaces would be provided on the site; no parking structures would be constructed. The amount of parking is almost twice as much parking as is provided by the Proposed Project, and would respond to the relative lack of access to transit (3.5 miles to the Metro Blue Line Del Amo Station) and lack of substantial parking resources in the vicinity of the Alternative 5 site.

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 spillover 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 (c).

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.

Geology and Seismicity

With respect to the geologic and seismic conditions, the District at South Bay Alternative site is located in an area that has formerly been used as a landfill. In addition, the District at South Bay Alternative site is largely located within an area designated by the City of Carson General Plan Safety Element and the State of California Seismic Hazard Maps as a CGS Liquefaction Hazard Zone.²⁵ Compliance with the most recent State Building Code and the City of Carson's Building Code seismic design standards and site evaluation requirements would reduce the risk of exposure of the Project's occupants and structures to ground shaking, liquefaction, differential settlement, or other geologic hazards. Thus, although geologic and seismic impacts would be greater at the District at South Bay Alternative site, impacts related to geology and soils would, as mitigated, be less than significant, and similar to those described for the Proposed Project.

Hazards and Hazardous Materials

Hazardous materials impacts related to the former landfill uses on the site are discussed further below. However, impacts related to exposure of workers or residents to accidental spills or other operational hazards would be the same at the District at South Bay Alternative site as described for the Proposed Project (Impacts 3.8-1 through 3.8-3).

Land Use and Planning

Like the Proposed Project, Alternative 5 would not result in the division of an established community, as the arena and other uses would be located entirely within the boundaries of the District at South Bay Alternative site; the vacation of streets would not be required. Alternative 5 would likely require an amendment to the City of Carson General Plan. With the amendment, Alternative 5 would be consistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus it would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

Population, Employment and Housing

According to The District at South Bay Specific Plan EIR, development under The District at South Bay Specific Plan could support a population increase of approximately 4,550 persons. However, this population growth would be within the Southern California Association of Governments' (SCAG) forecasted short- and long-term growth within the South Bay Cities Subregion.²⁶ Similar to the Proposed Project, Alternative 5 would add 768 employees to the District at South Bay Alternative site, which is well below the total persons added under the Specific Plan. As a result, the employees added under Alternative 5 would also be within SCAG's forecasted short- and long-term growth within the South Bay Cities Subregion. In addition, as no housing is located on the District at South Bay Alternative site, Alternative 5 would not result in the displacement of substantial numbers of people or housing. For these reasons, impacts related to population, employment, and housing (Impacts 3.12-1 through 3.12-4) under Alternative 5 would be similar in magnitude to the Proposed Project.

²⁵ City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. p. IV.E-7

²⁶ City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. p. VI-16.

Public Services

Fire protection services at the District at South Bay Alternative site is provided by the Los Angeles County Fire Department (LACFD) and police protection services are provided by the Los Angeles County Sheriff's Department (LACSD). There are multiple fire stations that provide service to the project site, including Station No. 36 which is the closest to the site.²⁷ The District at South Bay Alternative site is served by the Carson Sheriff Station located at 21356 South Avalon.²⁸ With the implementation of a series of design-related mitigation measures required of new projects in the City, and including the provision of space for use by the Sheriff's Department in the arena, the Proposed Project built and operated at the District at South Bay Alternative site would have a less than significant impact on the provision of fire and police protection services (Impacts 3.13-1 through 3.13-4). This impact would be similar in magnitude to the impact at the Project Site.

Because the Proposed Project does not include residential uses, it would not adversely affect City of Carson parks and recreation facilities or Los Angeles Unified School District elementary, middle, and high schools (Impacts 3.13-5 through 3.13-12). Thus, these impacts would be the same as with the Proposed Project.

Transportation and Circulation

Similar to the Proposed Project, Alternative 5 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic (Impact 3.14-11).

Utilities and Service Systems

Similar to the proposed project, Alternative 5 would demand approximately 103 AFY with the implementation of baseline water conservation measures and about 63 AFY with LEED Gold certification. Water service to the District at South Bay Alternative site is provided by the California Water Service Company (Cal Water). In accordance with the requirements of Senate Bill 610 and California Water Code Section 10912(a), Cal Water, as the designated water supplier, prepared a WSA for development proposed under the Boulevards at South Bay Specific Plan, which found that Cal Water did have adequate water supplies to meet the projected demands of the project in addition to those of its existing customers and other anticipated future water users in the Dominguez District for the 20-year period under all conditions. A separate analysis was also conducted to determine if further analysis of water supply and demand was required in connection with The District at South Bay Specific Plan, which modified the Boulevards at South Bay Specific Plan. The District at South Bay Specific Plan was projected to have an estimated annual demand of 705 AFY, and the separate analysis found that this demand would be less than previously projected for the Boulevards at South Bay Specific Plan, and thus The District at South Bay Specific Plan did not trigger the necessity to prepare a new WSA under California Water Code Section 10910(h).²⁹ As Alternative 5 would demand substantially less

²⁷ City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. p. VI-17.

²⁸ City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. p. VI-20.

²⁹ City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. pp. VI-28 to VI-31.

water that The District at South Bay Specific Plan, it also would not trigger the need to prepare a new WSA, and Cal Water would have sufficient supply from existing supplies and resources to serve development under Alternative 5.

Storm drainage infrastructure serving the District at South Bay Alternative site has been sized to accommodate intense development planned under the various versions of the specific plan that regulate development of the site. In addition, development under Alternative 5 would be required to implement drainage control features in accordance with the City's drainage control regulations as well as 2009 SUSMP requirements.³⁰ As a result, there would be no need for new or expanded storm drainage facilities (Impacts 3.15-9 and 3.15-10). These impacts would be similar to those described for the Proposed Project.

Impacts Identified as Being Less Severe than the Proposed Project

Biological Resources

The District at South Bay Alternative site has been completely disturbed and no vegetation, including trees, or habitat is present to support nesting raptors or migratory birds. As a result, Alternative 5 would not disturb nesting raptors or migratory birds (Impact 3.3-2) and would not result in the loss of protected trees (Impact 3.3-3).³¹ Mitigation Measures 3.3-2 and 3.3-3 to reduce these impact would not be required. As a result, unlike the Proposed Project, no impacts to nesting raptors or migratory birds and protected trees would occur under this alternative.

Cultural and Paleontological Resources

The District at South Bay Alternative site is a former landfill with no existing buildings or other structures. As a result, there is no potential for the development of the Proposed Project at this site to have a significant impact on unknown historical, archaeological, or tribal 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).³² Mitigation Measures 3.4-1, 3.4-4, and 3.6-2 to reduce these impacts would not be required. Therefore, under Alternative 5, impacts on cultural resources, including archaeological resources, tribal cultural resources, paleontological resources, and human remains would be less severe than under the Proposed Project.

Hazards and Hazardous Materials

Impacts related to proximity to nearby airports would be less severe for the District at South Bay Alternative site than for the Proposed Project, which is under the flight path of LAX and within 2 miles of Hawthorne Airport (HHR). The closest public airport to the District at South Bay Alternative site is the Compton Airport, which is located approximately 3.25 miles to the north. Therefore, development of the Proposed Project would not occur within 2 miles of a public or

³⁰ City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. p. VI-13.

³¹ City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. p. VI-4.

³² City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. p. VI-6.

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

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.

possible that the impacts would be less 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 for 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.

Given that the location of the District at South Bay Alternative site is over eight 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 (NO₂) (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, and much less likely to meet the AB 987 requirement for 50 percent local offsets.

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 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

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

³⁷ City of Carson, 2018. The District at South Bay Specific Plan EIR. March 2018. p. II-14.

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 Inglewood. Because the District at South Bay Alternative is located in the City of Carson and not in the City of Inglewood, none of the City of Inglewood's objectives for the project would be met under Alternative 5.

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.

The District at South Bay Alternative would meet most but not all of the Project Applicant’s objectives for the project. Because the District at South Bay Alternative site would first require acquiring the site, and then designing and approving the project through the City of Carson, it is uncertain if this alternative site would allow the applicant to begin hosting LA Clippers home games in the 2024-2025 season, and thus could be unable to meet Project Applicant Objective 1a. While a state-of-the-art multi-purpose basketball and entertainment center (Objective 1a) along with team facilities (Objective 1c) and retail uses (Objective 1e) would be constructed under the District at South Bay Alternative, it would not combine with the future stadium to create a dynamic, year-round sports and entertainment district destination in the southwestern portion of the City of Inglewood (Objective 3a).

Alternative 5 may not meet one of the applicant’s basic objectives for the project. Objective 1(b) states: “Locate a basketball and entertainment center on a site that is geographically desirable and accessible to the LA Clippers’ current and anticipated fan base.” The District at South Bay Alternative site is located approximately 11 miles southeast of the Project Site. As such, the site is located 11 miles further away from the Clippers’ current home at Staples Arena in downtown Los Angeles. For this reason, it is unclear whether this location would achieve Applicant Objective 1(b).

6.5.6 Alternative 6: Hollywood Park Specific Plan Alternative Site

Description

Under Alternative 6, elements of the Proposed Project would be developed on an approximately 12-acre site near the NFL Stadium currently under construction within the Hollywood Park Specific Plan (HPSP) area to the north of the Project Site across West Century Boulevard (see **Figure 6-5**). As with the Proposed Project, Alternative 6 would involve the construction of a new multi-purpose arena to serve as the home of the LA Clippers NBA basketball team in the City of Inglewood and as much of the related development included in the Proposed Project as feasible, including the relocation of the LA Clippers team offices and team practice and athletic training facility.

The focus of this alternative is to identify the impacts that would occur if the arena and related uses, including the ancillary plaza uses, would be developed on a site (the HPSP Alternative site) within the HPSP area to potentially avoid or lessen the transportation-related impacts associated with concurrent events at the NFL Stadium and the Proposed Project. As a means of avoiding or lessening these impacts, Alternative 6 assumes that the arena and NFL Stadium operators would be able to reach a mutually agreed schedule coordinating events at the two venues. The analysis also focuses on whether locating the Proposed Project on the alternative site would otherwise avoid or reduce one or more significant environmental impacts of the Proposed Project.

Alternative 6 would include sufficient land to potentially accommodate the uses included in the Proposed Project, provided the property would become available and could be acquired by the project applicant.

The HPSP area includes development under the Stadium Alternative of the HPSP. This analysis assumes the completion of development of certain components referred to as the HPSP Adjusted Baseline projects in Section 3.0.5, which include the construction of a 70,000-seat open air NFL Stadium, a 6,000-seat performance venue, 518,077 square feet of retail and restaurant uses, 466,000 square feet of office space, 314 residential units, an 11.89-acre park with a large water feature, a 4-acre civic use, and approximately 9,900 parking spaces within the HPSP area. Although the retail, dining, and multi-purpose space for community programming could potentially be incorporated into the previously planned and approved development at Hollywood Park, the evaluation of this Alternative 6 for the purposes of this analysis conservatively assumes that such development would be additive to the HPSP development included in the Adjusted Baseline together with approved future development within the HPSP area. In other words, under this alternative, the uses proposed as part of the Proposed Project would not supplant development authorized under the HPSP, but would be added atop the development authorized under the HPSP.

Alternative 6 would involve the development of the Proposed Project within the HPSP area on an approximately 12-acre site to the south of the NFL Stadium currently under construction. This evaluation of Alternative 6 assumes the completion of the proposed development described as the HPSP Adjusted Baseline Projects in Section 3.0.5. The Alternative 6 site is comprised of parcels currently approved for future development in the HPSP, as discussed in Section 3.0.6 (Cumulative Assumptions). The Alternative 6 site would be approximately 75 percent of the size of the Arena Site (and approximately 47 percent of the total Project Site, including the parking parcels), but would accommodate many of the uses proposed by the Proposed Project (e.g., the athletic training and practice facility, LA Clippers team offices, and sports medicine clinic).

Uses in the vicinity of the Alternative 6 site include the HPSP Adjusted Baseline Projects, including retail, park, residential, commercial office, stadium, hotel and ancillary uses. The area to the north of the HPSP area is zoned C-R Commercial Recreation and includes the historic Forum concert venue and associated surface parking. The area to the east of the HPSP area is zoned R-2 Residential Limited Multi Family, Open Space, R-1 Residential Single Family, and C-R Commercial Recreation. The area to the south of the HPSP area is zoned C-2A Airport Commercial and M-1 Light Manufacturing. The area to the west of the HPSP area is zoned C-2A Airport Commercial and C-2 General Commercial.

Similar to the Proposed Project, development under Alternative 6 would include the Arena Structure, including an approximately 915,000 sf arena to host LA Clippers NBA games and other events, the LA Clippers team offices (71,000 sf), the LA Clippers practice and training facilities (85,000 sf) and a sports medicine clinic (25,000 sf). Seating capacity of the arena would remain at 18,000 attendees for LA Clippers NBA basketball games and a maximum capacity of up to 18,500 attendees for concert events. The overall design of the Arena Structure under Alternative 6 would be identical to the Proposed Project, with the modification that the parking structure adjacent to the Arena Structure in the Proposed Project would not be constructed.

Access to the arena would be provided from a landscaped pedestrian plaza in the HPSP area, along the southern edge of Lake Park, and lead directly into the main lobby of the arena.

Although the retail development within the HPSP area described in the Adjusted Baseline would be located directly adjacent to the Alternative 6 site, and the ancillary retail, dining, and multi-purpose space for community programming uses included in the Proposed Project could potentially be located within that development, this evaluation of Alternative 6 assumes that the total 63,000 sf of ancillary uses would be additional to the development within the HPSP area analyzed in the Adjusted Baseline and Cumulative analyses described in Section 3.0. Thus, as with the Proposed Project, Alternative 6 would include the development of 24,000 sf of food and drink uses, 24,000 sf of retail uses, including a 7,000 sf LA Clippers team store, and 15,000 sf of multi-purpose space for community programming. Alternative 6 would not include the construction of a new hotel or removal of an existing municipal water well and construction of a new replacement well. The proposed West Parking Structure and East Parking Structure and Transportation Hub components of the Proposed Project would not be constructed under Alternative 6.

Primary access to the area around the HPSP IBEC Site would be from Century Boulevard and South Prairie Avenue to the internal access roads within the HPSP Area. Development of Alternative 6 would require modification of the alignment of a proposed internal roadway along the Alternative 6 site and accompanying utilities to the south to accommodate the arena and ancillary development.

Regional access to the Alternative 6 site is essentially the same as of the Project Site and is provided by the San Diego Freeway (I-405), located approximately 2.6 miles to the west, and the Glenn Anderson Freeway & Transitway (I-105), located 1.6 miles to the south. Local access to the Alternative 6 would be slightly different from the Proposed Project, provided by several major arterials, including South Prairie Avenue and West Century Boulevard with alternative connections to Hawthorne Boulevard, Crenshaw Boulevard and Arbor Vitae Street.

Transit access to the HPSC site is provided by several bus lines and the future Crenshaw/LAX light rail line. The closest bus stop, at the intersection of South Prairie Avenue and Hardy Street, is about one third of a mile from the Alternative 6 site, and the nearest light rail station is approximately 1.5 miles away. Similar to the Proposed Project, development of the Alternative 6 would include shuttle service to and from existing nearby rail transit stations and a shuttle drop-off and pick-up area near the arena to accommodate the shuttle service.

A total of 1,045 additional parking spaces would be developed within surface parking areas and subterranean parking structures located within the Alternative 6 site, as shown on Figure 6-5. The parking structures and surface parking areas would be accessed from the internal street network within the HPSP area, with primary access from South Prairie Avenue and Pincay Drive, with access to certain premium parking areas from the proposed Stadium Drive accessed from West Century Boulevard.

The HPSP requires that “no less than nine thousand (9,000) spaces located throughout the HPSP area shall be made available” for the NFL Stadium. As described in Section 3.0.5, the Adjusted Baseline includes approximately 9,900 spaces located within the HPSP area based on information included in plans submitted to the City of Inglewood. This analysis assumes that the development

of an arena under Alternative 6 would include an agreement between the operators of the NBA arena and the NFL Stadium to coordinate events and shared parking. The remaining parking demand for events at the arena developed under Alternative 6 would be provided through the parking facilities within the HPSP area through coordination between the NFL Stadium and parking facility operators and the operator of the arena. Such coordination is anticipated to include location of the TNC loading areas and other transportation facilities such as charter bus and microtransit staging and loading areas sufficient to serve Alternative 6.

The parcels included in the Alternative 6 site are designated Mixed-Use (MU) within the current HPSP which permits athletic, social, entertainment, dining recreation and leisure uses. The area immediately to the north of the Alternative 6 site would continue be developed as Lake Park, an open space area with a large water feature. The total permitted development as described in the HPSP would continue to be permitted. Thus, the uses within the MU zone that might have otherwise occurred at the Alternative 6 site would move elsewhere within the HPSP. The HPSP contains sufficient land to accommodate the relocation of these uses.

If Alternative 6 were developed, it is anticipated that the ownership of the properties within the Proposed Project Site would not change, private property would not need to be acquired for development of the proposed uses, and none of the uses that presently occupy the Project Site would be relocated. Similarly, the vacation of either West 101st Street or West 102nd Street would not be required. Potentially, a portion of the properties within the Project Site owned by the City and or the Successor Agency could be used for construction staging under Alternative 6. However, the revitalized development of the Project Site would not occur as part of Alternative 6.

The HPSP area is a privately-owned property subject to a detailed specific plan (the Hollywood Park Specific Plan), as well as a Development Agreement between the City and the HPSP developer. Development authorized under the HPSP is currently being implemented. There is, therefore, substantial uncertainty regarding site control and the feasibility of this alternative. The development of Alternative 6 would potentially require amendments to the HPSP, which would require the consent of the landowner and approval of the City pursuant to the terms of the Development Agreement between the City and the property owner.

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 6. The comparative analysis of environmental effects provided below was informed by the 2009 Hollywood Park Redevelopment Project EIR (HPRP EIR),⁴⁰ which contains information relating to conditions in and around the HPSP 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 Proposed arena and the amount of ancillary development would be the same as the development in the Proposed Project, many of the impacts of the Proposed Project

⁴⁰ City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009.

that are affected by the intensity of development would remain the same or very similar at the HPSP Alternative Site.

Aesthetics

HPSP Alternative site, along with the entirety of the HPSP area, is located in an urbanized community that is currently undergoing development. The area in the vicinity of the HPSP Alternative site does not have any scenic vistas or unique visual characteristics. Visual impacts associated with Alternative 6 would be similar to the Proposed Project (Impacts 3.1-1 and 3.1-4) although limited views along South Prairie Avenue due to the proposed pedestrian bridge would not occur under this alternative.

The nearest shadow sensitive uses are existing residences located approximately 2,100 feet to the east and residences located about 1,100 feet to the west, as well as new residences being constructed under the Adjusted Baseline about 750 feet to the west, and under cumulative conditions about 750 feet to the east. Given these distances, like with the Proposed Project, there would be no significant impacts related to shadowing of residences or other sensitive uses (Impact 3.1-3). For these reasons, impacts related to views, and shadow would be similar to those of the Proposed Project.

Cultural Resources

Like the Project Site, there are no known archaeological or paleontological resources located on the HPSP Alternative site. According to the HPRP EIR, it is possible that development on the HPSP site could disturb buried archaeological resources,⁴¹ destroy previous unknown unique paleontological resources,⁴² and disturb unknown human remains.⁴³ Since the preparation of the HPRP EIR, substantial ground disturbing earthwork has taken place on the HPSP site, and thus surface soils have been highly disturbed to prepare the property for development. However, like at the Project Site, the Proposed Arena would require excavation to a depth of approximately 35 feet, which is below the area that has been recently disturbed. Therefore, like with the Proposed Project, it is possible that implementation of Alternative 6 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.

Hazards and Hazardous Materials

As discussed above, the HPSP Alternative site has been mass graded as part of HPSP development activities, and as part of these activities sites within the HPSP Alternative site

⁴¹ City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009. p. IV.E-28.

⁴² City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009. p. IV.E-29.

⁴³ City of Inglewood, 2009. *Hollywood Park Redevelopment Project EIR*. July 2009. p. IV.E-28.

containing soil contamination have been remediated. However, it is possible that previously contaminated soils may still remain on the HPSP Alternative site, and thus, as with the Proposed Project, construction workers could be exposed to contamination during ground disturbing activities (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. For this reason, impacts related to on-site contamination would be similar to the Proposed Project.

Hydrology and Water Quality

Similar to the Proposed Project, it is possible that construction and operation of Alternative 6 could degrade the quality of the water that is discharged from the HPSP Alternative site (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). In addition, as with the Proposed Project, altered drainage patterns on the HPSP Alternative site during both construction and operation have the potential to result in erosion, sedimentation, and/or flooding on or offsite by redirecting or concentrating flows (Impact 3.9-3 and 3.9-6). Although it is not yet designed, it is likely that the drainage system for Alternative 6 would be tied into the comprehensive drainage and water quality treatment system being constructed in the HPSP area, including the adjacent Lake Park. Mitigation Measure 3.9-1(a) would require the project at the HPSP Alternative site to comply with a number of regulations governing water quality and drainage while Mitigation Measure 3.9-1(b) would require the periodic sweeping of parking lots during operation to remove contaminants. As a result, impacts related to water quality and drainage would be similar to those described for the Proposed Project.

Land Use and Planning

Like the Proposed Project, Alternative 6 would not result in the division of an established community, as the arena and other uses would be located entirely within the HPSP area; the vacation of streets would not be required. Alternative 6 would potentially require approval of amendments to the HPSP, and related entitlement documents. With the approval of such amendments, Alternative 6 would be consistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus it would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4).

Noise and Vibration

Vibration sensitive receptors within the HPSP area, including commercial retail buildings that will be constructed under the Adjusted Baseline, are located in close proximity to the HPSP Alternative site. Construction vibration levels under Alternative 6 would be similar to the Proposed Project due to the use of similar amounts of equipment and construction methods. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-7) would be the same, and would still require 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.

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 6, although employment generation on the HPSP Alternative site would be reduced by about seven percent as no hotel would be constructed.

Public Services

Because Alternative 6 would have the same type and amount of development (other than the elimination of the hotel and water well), and the same event profile as the Proposed Project, under Alternative 6 impacts of the Proposed Project on public services, including fire and police protection, parks and recreation facilities, would remain similar and would continue to be less than significant (see Impacts 3.13-1 through 3.13-12). Because employment on the Alternative 6 site would be reduced by about seven percent under Alternative 6, 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 6. As described in Table 3.13-9, the arena and commercial uses under Alternative 6 would be expected to generate a total of 49 new school students, a reduction of 1 student compared to the Proposed Project.

Transportation and Circulation

Under Alternative 6, the Project would be of similar size to the Proposed Project, with a similar level of access to rail transit via shuttles for major events. As such, it is anticipated that vehicle trip generation for arena events and the ancillary uses at the Alternative 6 site would be similar to that for the Proposed Project. Given the proximity of the Alternative 6 site to restaurant and retail uses proposed as part of the HPSP, arrival and departure times before and after events could spread somewhat to the extent that these uses attract additional eventgoers. However, a material reduction in the level of intersection or freeway facility impacts would not be expected.

Similar to the Proposed Project, Alternative 6 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic.

The Alternative 6 site is located approximately 0.5 mile from the Centinela Hospital Medical Center. Impacts of the Proposed Project-related congestion on emergency access would be similar to those for the Proposed Project.

Impacts Identified as Being Less Severe than the Proposed Project

Aesthetics

The nearest light sensitive uses are existing residences located approximately 2,100 feet to the east and residences located about 1,100 feet to the west, as well as new residences being constructed under the Adjusted Baseline about 750 feet to the west, and residences that would be developed under cumulative conditions about 750 feet to the east. Given these distances there would be no significant spillover lighting effects (Impacts 3.1-2 and 3.1-5), and Mitigation Measures 3.1-2(a) through (c) would not be required. For these reasons, impacts related to spillover lighting would be less than described for the Proposed Project.

Air Quality and GHG

Air Quality and GHG emissions during construction and operation under Alternative 6 would be similar to the Proposed Project but slightly lessened because Alternative 6 would not include the planned hotel on the East Transportation and Hotel Site or a new potable water well. Therefore, similar to the Proposed Project, Alternative 6 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 (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 (NO₂) (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.

Biological Resources

The HPSP Alternative site has been mass graded and completely disturbed. No vegetation, including trees, or other habitat is present to support nesting raptors or migratory birds. As a result, Alternative 6 would not disturb nesting raptors or migratory birds (Impact 3.3-2) and would not result in the loss of protected trees (Impact 3.3-3). Mitigation Measures 3.3-2 and 3.3-3 to reduce these impacts would not be required. As a result, unlike the Proposed Project, no impacts to nesting raptors or migratory birds and protected trees would occur under this alternative.

Energy Demand and Conservation

Energy demand during construction and operation under Alternative 6 would be similar to the Proposed Project but slightly lessened as this alternative would not include the construction and operation of a hotel on the East Transportation and Hotel Site or a new replacement potable water well (Impacts 3.5-2 and 3.5-4).

Hazards and Hazardous Materials

Unlike to Project Site, the HPSP Alternative site is located in between the approach flight paths for the primary runways at LAX, and not located within the planning boundary/airport influence area (AIA) established for LAX in the Los Angeles County Airport Land Use Plan (ALUP). Further, compared to the Project Site, the additional distance between the Alternative 6 site and the Hawthorne Airport (HHR) would mean that the arena structure at the Alternative 6 site would not penetrate the HHR horizontal imaginary surface, but construction cranes for the arena would continue to penetrate the HHR horizontal surface. In addition, the arena construction cranes

would penetrate both the HHR horizontal surface and notification surface. As a result, while there would be no significant impact related to penetration of the LAX obstacle clearance surface (Impact 3.8-5) under Alternative 6, this alternative would still require the implementation of Mitigation Measure 3.8-5.

Noise and Vibration

Under the Adjusted Baseline, noise sensitive receptors within the HPSP area would be located approximately 750 feet to the west of the HPSP Alternative site. Under cumulative conditions, additional noise sensitive receptors would be located approximately 750 to the east within the HPSP area. These noise sensitive receptors would be substantially further from the Alternative 6 site than the sensitive receptors that are located immediately adjacent to the Project Site.

Construction noise levels generated under Alternative 6 would be similar to the Proposed Project due to the use of similar amounts of equipment and construction methods. Because noise sensitive receptors would be further from the Alternative 6 site than the Project Site, impacts associated with a temporary increase in noise during construction (Impacts 3.11-1 and 3.11-5) would be less severe than under the Proposed Project, and would likely not require the implementation of measures and controls to reduce noise during construction (Mitigation Measure 3.11-1).

Traffic generated under Alternative 6 would use much of the same roadway network as the Proposed Project. However, traffic under Alternative 6 would be shifted away from noise sensitive receptors south of West Century Boulevard, and thus would not negatively affect as many sensitive receptors as the Proposed Project. In addition, operational sound from outdoor plaza events would be reduced as noise sensitive receptors would be located much farther away from amplified noise than under the proposed project and, due to the positioning of the stage, the amplified noise would be directed northwest across the lake and not in the direction of sensitive receptors located to the west and east. Thus, impacts associated with a permanent increase in noise during operation (Impacts 3.11-2 and 3.11-6) would be reduced, but would still require the implementation of Mitigation Measure 3.11-2(a), which would require the preparation of a noise reduction plan major events, and Mitigation Measure 3.11-1(b), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b)).

The HPSP Alternative site is not located within the planning boundary/AIA established for LAX in the Los Angeles County ALUP. Therefore, unlike the proposed project, the arena and ancillary uses under Alternative 6 would not be impacted by aircraft noise (Impacts 3.11-4 and 3.11-8).

Transportation

Given the location of the site within HPSP, the Project at this location could have a reduced level of impacts on existing neighborhood streets. That is because a grid network of residential streets only exists to the west of South Prairie Avenue and south of West Century Boulevard and not to the east or north of the site. For this reason, those traveling to or from the Alternative 6 site would

be less likely to travel on existing neighborhood streets than they would at the Proposed Project site. The potential for such impacts would still exist, and the same mitigation measures would apply.

The elimination of the hotel use would avoid the significant VMT impact identified for the Proposed Project's hotel use.

Since all parking would be provided either on-site or in HPSP parking lots near to the site under Alternative 6, pedestrian impacts would be lessened since impacts associated with pedestrians crossing arterial streets would not be expected to be significant. This could also potentially lessen eventgoer confusion regarding where they should park and reduce local circulation.

Under Alternative 6, it is anticipated that events at the NFL Stadium and the Proposed Project would be subject to a mutually-agreed schedule to reduce transportation impacts. Concurrent Event Scenario 2 (Major Event at Proposed Project and Football Game at NFL Stadium) and Scenario 5 (Major Events at Proposed Project and The Forum and Football Game at NFL Stadium) as analyzed in Chapter 3.14 may still occur, as those scenarios envisioned a football game on a weekend afternoon and events at the Proposed Project and The Forum during a weekend evening. Impacts associated with these scenarios would not be reduced. Concurrent Event Scenario 3 (Major Event at Proposed Project and Midsize Event at NFL Stadium) and Scenario 4 (Major events at Proposed Project and The Forum and Midsize Event at NFL Stadium), however, would not occur as those scenarios envision events in the NFL Stadium and at the Proposed Project at the same time with concurrent arrival and departure patterns. The impacts associated with these scenarios would not occur and alternative off-site remote parking would not be required for the Proposed Project. If concurrent events were to occur in the separate 6,000-seat performance venue under construction at HPSP, impacts on the transportation system would be reduced from those anticipated for Concurrent Event Scenarios 3 and 4.

Because the frequency with which concurrent events occurs would be reduced, the likelihood impacts to emergency access during concurrent events would be correspondingly reduced.

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.

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

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, unlike 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 likely be less than significant, and Alternative 6 would not require implementation of Mitigation Measures 3.15-9 and 3.15-10. As a result, impacts related to stormwater drainage would be less severe than those described for the Proposed Project.

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. Thus, the HPSP area is not underutilized to the same degree as the Project Site. 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 6 would not be as responsive to this objective as the Proposed Project.

The HPSP Alternative would meet most but not all of the Project Applicant’s objectives for the project. Because the HPSP Alternative would first require acquiring the site, amending the existing HPSP and its implementing documents, including a Development Agreement, along with associated CEQA review, it is uncertain if Alternative 6 would allow the applicant to begin hosting LA Clippers home games in the 2024-2025 season. For this reason, the HPSP Alternative could be unable to meet Project Applicant Objective 1a.

Alternative 7: The Forum Alternative Site

Description

Under Alternative 7, elements of the Proposed Project would be developed on an approximately 28-acre site currently occupied by the historic Forum concert and event venue (the Forum Alternative site), located approximately 0.8 miles north of the Project Site at 3900 West Manchester Boulevard in the City of Inglewood (see **Figure 6-6**). As with the Proposed Project, Alternative 7 would involve the construction of a new multi-purpose arena to serve as the home of the NBA LA Clippers basketball team and as much of the related development included in the Proposed Project as feasible, including the relocation of the LA Clippers team offices and team practice and athletic training facility.

The focus of this alternative is to identify the impacts that would occur if the arena and related uses, including the ancillary plaza uses and the same amount of on-site parking, are developed on the Forum Alternative site to potentially avoid or substantially lessen one or more significant environmental impacts of the Proposed Project, including the transportation-related impacts associated with concurrent events at the existing Forum venue and the Proposed Project.

The Forum Alternative site is currently developed with an historic concert venue known as The Forum, which has hosted sporting and entertainment events in the City since 1967 and is listed on both the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register). As discussed further in this section below, the development of a modern arena that meets NBA standards on the Forum Alternative site would require that the Forum Alternative site would be available and could be acquired by the project applicant, and the demolition of the existing Forum building. If the existing Forum building were to be demolished, Alternative 7 would include sufficient land to potentially accommodate the uses included in the Proposed Project.

Alternative 7 would involve the development of the same or substantially similar components of the Proposed Project on approximately 28 acres currently occupied by the historic Forum concert and event venue and ancillary structures and surface parking. The Forum Alternative site would be approximately 68 percent larger than the Proposed Project Arena Site (and approximately the same size as the total Project Site). As such, the Forum Alternative site could accommodate a program of development similar to the Proposed Project, although the hotel and well relocation components would not be included and the ancillary uses and parking would be configured differently.

The Forum Alternative site is currently zoned C-R Commercial Recreation. Areas to the east and west of the Forum site are zoned R-2 Residential Limited Multi Family, Open Space, R-1 Residential Single Family, and C-R Commercial Recreation. Uses in the immediate vicinity of the Forum site include the Inglewood Park Cemetery to the north, residential and commercial uses to the west across South Prairie Avenue, and the residential community known as Carlton Square to the east across Kareem Court. The HPSP area is located immediately to the south of the Forum Alternative site, across Pincay Drive.

Existing Forum Building

The Forum Alternative site is currently developed with the historic Forum concert and event venue. The Forum is an approximately 350,000 sf arena that opened in 1967 and until 1999 was the home of the NBA Los Angeles Lakers, the NHL Los Angeles Kings, and the WNBA Los Angeles Sparks, and hosted other major sporting events and other athletic competitions, concerts, and events. In 1999 and 2000, all three professional sports teams left Inglewood and moved to the then-new Staples Center in downtown Los Angeles.

The Forum was acquired in 2000 by the Faithful Central Bible Church, which used it for occasional church services and leased it for sporting events, concerts and other events. In 2012,

the Forum was purchased by Madison Square Garden Company and underwent comprehensive renovation and rehabilitation that included structural, aesthetic, and amenity improvements completed in 2014 to convert the Forum into a world-class concert and event venue. On September 24, 2014, the Forum was listed on the National Register of Historic Places and the California Register of Historic Resources as an architecturally significant historic place worthy of preservation. The renovation of the Forum was funded in part by federal tax credits for its restoration as a National Register-listed building and an \$18 million loan from the City of Inglewood for the restoration and rehabilitation of the structure.

The Forum, as renovated to function as a concert and event venue and listed on the National Register and the California Register, is substantially smaller than, and does not include the features and amenities provided in, modern NBA arenas. Constructed in 1967, The Forum structure stands at approximately 350,000 sf. By comparison, current NBA arenas range in size from approximately 586,000 sf to over one million sf, with the average of the three most recently-constructed arenas exceeding 700,000 sf.⁴⁵ The relatively small size of The Forum would make the use of the structure to serve as the home arena of an NBA team infeasible because the structure lacks sufficient space for the range of vendors, food and drink establishments, luxury boxes and loge seating options, and other amenities required for a contemporary NBA home arena.

A conversion of The Forum from a concert and event venue to a modern home arena for an NBA team with related facilities would require extensive alterations to the historic structure, and a substantial increase in size.⁴⁶ At a minimum, required modifications would likely include, but not be limited to, the demolition and expansion of exterior walls and the roof of The Forum structure to accommodate the facilities and amenities required for a contemporary NBA arena such as a modern scoreboard, standard and premium seating, and sufficient concourse areas, clubs and locker rooms, food and beverage preparation and service areas, and other facilities. Even assuming such alterations were structurally feasible and any part of the original structure could be retained or repurposed, these changes would remove or substantially alter the character defining features of The Forum that make it eligible for listing on the National Register and California Register.

⁴⁵ The three most recently-constructed home NBA arenas include the Golden 1 Center in Sacramento, approximately 675,000 sf with a capacity of approximately 17,500; the Fiserv Forum in Milwaukee, approximately 724,000 sf with a capacity of approximately 17,500; and the Chase Center in San Francisco, approximately 750,000 sf with a capacity of approximately 18,000 seats.

⁴⁶ An example of the renovation of an historic arena in Seattle for the purpose of hosting professional sports home team games suggest that such a conversion of The Forum could require at least a doubling in size of the arena structure. In that case, the former Key Arena is being renovated to become the Arena at Seattle Center, increasing in square footage from approximately 410,000 sf to approximately 670,000 sf, with projected seating capacity of 18,350. While Key Arena was built in the early 1960s, the only part of the building that was listed on the National Register was the iconic modern roof of the structure. The current renovation of that structure involves the complete preservation of the historic roof structure while excavating under and around the current arena footprint to add sufficient square footage. Such an expansion to increase the size of The Forum without altering its historic façade and building design would be infeasible.

In addition, the other components of the Proposed Project, including the team office space, team practice and athletic training facility, sports medicine clinic, and the ancillary retail, dining, and community uses would likely not be feasible to accommodate within the Forum structure. Therefore, additional structures around the Forum would be required to accommodate those uses, obscuring or altering views of the Forum. These alterations would materially and adversely alter the "central location on an open site with high visibility from adjacent streets and properties" of The Forum, which is one of the character defining features for which the building is listed on the National Register and California Register.

In summary, it does not appear that the renovation, rehabilitation, or expansion of The Forum to function as a modern NBA arena would be feasible. Even if it were, it could not be accomplished without a significant adverse effect on an historic resource. Thus, Alternative 7 evaluates the demolition of The Forum and the redevelopment of the site with the components of the Proposed Project. While demolition of the Forum building is the only feasible manner to accommodate the development of a modern NBA arena and other components of the Proposed Project on the Forum Alternative site, were the site to become available for acquisition by the project applicant, the effects of removal of The Forum would be subject to a policy determination for decision makers.

Forum Alternative Characteristics

Similar to the Proposed Project, development under Alternative 7 would include the Arena Structure, including an approximately 915,000 sf arena to host LA Clippers NBA games and other events, the LA Clippers team offices (71,000 sf), the LA Clippers practice and training facilities (85,000 sf) and a sports medicine clinic (25,000 sf). Seating capacity of the arena under Alternative 7 would remain at 18,000 attendees for LA Clippers basketball games and a maximum capacity of up to 18,500 attendees for concert events.

The overall design of the main Arena Structure under Alternative 7 would be substantially similar to the Proposed Project, though oriented differently, with the main arena lobby entrance opening to the south onto a pedestrian plaza located at the corner of South Prairie Avenue and Pincay Drive with portions extending to the corner of South Prairie Avenue and Manchester Boulevard, as shown in **Figure 6-6**. As in the design included in the Proposed Project, the height of the main Arena Structure and appurtenances would extend up to 150 feet above grade, with the event level of the arena at approximately 30 to 35 feet below grade. The pedestrian plaza would be bound to the west by the arena structure and structured parking. The ancillary retail, dining, and multipurpose space for community programming uses would be included in separate structures within the plaza.

Similar to the Proposed Project, a total of 4,125 parking spaces as required by the City of Inglewood Municipal Code would be provided within the Forum site. As shown in **Figure 6-6**, these majority of the on-site parking spaces would be provided in a 3,525-space parking structure to the north of the main Arena Structure, with the remaining spaces provided in surface parking around the main Arena Structure and a limited amount of subterranean structured parking.

Alternative 7 would not include a hotel or a construction of a new municipal water well to replace the well within the Project Site.

Access to the Forum Alternative site would utilize some of the existing access points to the site, including those from West Manchester Boulevard, South Prairie Avenue, Pincay Drive and Kareem Court. The on-site parking structure would be accessed from South Prairie Avenue and West Manchester Boulevard, with access to surface parking provided from Pincay Drive.

Regional access to the Forum Alternative site would be similar to but slightly different than access to the Project Site. Access to the Forum Alternative site is provided by the San Diego Freeway (I-405), located approximately 1.7 miles to the west, and the Glenn Anderson Freeway & Transitway (I-105), approximately 1.8 miles to the south, and the Harbor Freeway (I-110), approximately 3.4 miles to the east. Local access to the Forum Alternative site would be similar to access to the existing concert and event venue provided by several major arterials, including South Prairie Avenue and Manchester Boulevard with alternative connections to Florence Avenue, Hawthorne Boulevard, Crenshaw Boulevard and Arbor Vitae Street.

Transit access to the Forum Alternative site is provided by several bus lines and the future Crenshaw/LAX light rail line. The closest public transit stops are bus service stops located along the West Manchester Boulevard frontage of the Forum Alternative site, including a stop serving the Metro 115 bus line, and a bus stop located at the southwest corner of South Prairie Avenue and West Manchester Boulevard serving the Metro 115, 211, and 442 lines. The nearest rail transit stop that would serve the Forum Alternative site would be the Crenshaw/LAX light rail line Downtown Inglewood station currently under construction approximately 1.3 miles away by surface streets.

If Alternative 7 were developed, it is anticipated that the ownership of the properties within the Project Site would not change, private property would not need to be acquired for development of the proposed uses, and none of the uses that presently occupy the Project Site would be relocated. Similarly, the vacation of West 101st Street and West 102nd Street would not be required.

The Forum Alternative is a privately-owned property subject to a Development Agreement between the City and The Forum property owner. There is, therefore, substantial uncertainty regarding site control and the feasibility of this alternative. The development of Alternative 7 could require amendments to the Commercial Recreation zoning and land use designations to accommodate the Alternative 7 development within the site.

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 7.

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

Because the type and amount of development as well as the size of the arena would be essentially the same as the development in the Proposed Project, many of the impacts of the Proposed Project that would be affected by the intensity of development would remain the same or would be very similar at the Forum Alternative site.

Aesthetics

The nearest shadow sensitive uses are residences located across Kareem Court, approximately 75 feet to the east, and residences located on East Nutwood Street, across South Prairie Avenue about 190 feet to the west. With the addition of Alternative 7 at this location, the height of proposed structures and the distance between those structures and nearby shadow sensitive receptors would result in shadows affecting adjacent properties to the east in afternoons in December that would not exceed the threshold of three hours of new shadow. Morning shadows, to the west, would not reach the shadow sensitive receptors across South Prairie Avenue. Therefore, like the Proposed Project, the shadow impacts (Impact 3.1-3) of Alternative 7 would be less than significant.

Biological Resources

A number of mature landscape trees are located around the Forum structure, and street trees are present in the landscape strip along South Prairie Avenue, West Manchester Boulevard, and Kareem Court, adjacent to the Forum Alternative site. As a result, like the Proposed Project, Alternative 7 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 be required to reduce these impacts by protecting 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 Resources

The Forum was originally developed in 1966-67, before State and federal laws that protect historic and archaeological resources were in force.⁴⁷ Like the Project Site, there are no known archaeological or paleontological resources located on the Forum Alternative site. However, it is possible that development on the Forum Alternative site could disturb buried archaeological resources, destroy previous unknown unique paleontological resources, and disturb unknown human remains. Therefore, it is possible that, like with the Proposed Project, implementation of Alternative 7 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

⁴⁷ The National Historic Preservation Act was enacted in 1966, and related regulations were not adopted and in force at the time of the development of the Forum. CEQA was passed in 1970, and the California Office of Historic Preservation was opened in 1975.

appropriately evaluated and treated. Therefore, impacts on archaeological resources, paleontological resources, and human remains would be similar to the Proposed Project.

Hazards and Hazardous Materials

The Forum Alternative site is listed twice on the Geotracker database maintained by the State Water Resources Control Board for releases of diesel found in subsurface soil. Both cases involved leaking underground storage tanks, one reported in 1986 and the other reported in 2004; both cases have been subsequently closed.⁴⁸ However, it is possible that previously contaminated soils may still remain on the Forum Alternative site, and thus, as with the Proposed Project, construction workers could be exposed to contamination during ground disturbing activities (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. For this reason, impacts related to on-site contamination would be similar to the Proposed Project.

Similar to project site, the Forum Alternative site is located within the planning boundary/airport influence area (AIA) established for LAX in the Los Angeles County Airport Land Use Plan (ALUP). Compared to the Project Site, the additional distance between the Alternative 7 site and the Hawthorne Airport (HHR) would mean that the arena structure at the Alternative 7 site would not penetrate the HHR horizontal imaginary surface, but construction cranes for the arena would continue to penetrate the HHR horizontal surface. In addition, the arena construction cranes would penetrate both the HHR horizontal and notification surfaces. As a result, hazards to air navigation (Impact 3.8-5) under Alternative 7 would be the same as the Proposed Project. Mitigation Measure 3.8-5 would reduce this impact by requiring the project applicant to notify the FFA and complete an aeronautical study to determine whether the Proposed Project would constitute a hazard to air navigation, to implement all actions required by the FAA to avoid the creation of a hazard to air navigation, and to submit to the City a consistency determination from the ALUC. As a result, hazards to air navigation would be similar to the Proposed Project.

Hydrology and Water Quality

The Forum Alternative site is fully developed with impervious surfaces; pervious surfaces on the site are minimal and include small planters with ornamental landscaping and street frontage landscape strips. Sheet flow stormwater runoff on the Forum Alternative site is managed by an existing system of storm drains. As a result, it is possible that construction and operation of Alternative 7 could cause water quality discharges that are not consistent with SWRCB objectives and could degrade the quality of the water that is discharged from the Forum Alternative site (Impacts 3.6-1, 3.6-3, 3.9-1 and 3.9-4). Altered drainage patterns during both construction and operation on the site would also have the potential to result in erosion, sedimentation, and/or flooding on or offsite by redirecting or concentrating flows (Impact 3.9-3 and 3.9-6). In order to lessen the significance of these impacts for Alternative 7, like the Proposed Project, Mitigation Measure 3.9-1(a) would require the project to comply with a number of regulations governing water quality and drainage while Mitigation Measure 3.9-1(b) would require the periodic

⁴⁸ State Water Resources Control Board, 2019. Geotracker database. Accessed: May 9, 2019.

sweeping parking lots during operation to remove contaminants. Therefore, impacts related to water quality and drainage would be similar to the Proposed Project.

Land Use and Planning

Like the Proposed Project, Alternative 7 would not result in the division of an established community, as the arena and other uses would be located entirely within the Forum Alternative site; the vacation of streets would not be required (Impacts 3.10-1 and 3.10-3). The City of Inglewood designates the western third of the Forum Alternative site, along South Prairie Avenue, as Commercial/Residential while the remainder of the site is designated as Commercial/Recreation. As described above, the development of Alternative 7 could require amendments to the Commercial Recreation zoning and land use designations to accommodate the Alternative 7 development within the site. With such amendments, Alternative 7 would be consistent with plans or policies that have been adopted for the purposes of environmental mitigation, and thus it would have less-than significant-impacts related to land use and planning (Impacts 3.10-1 through 3.10-4). As a result, impacts related to land use and planning would be similar to the Proposed Project.

Noise and Vibration

Construction noise levels generated under Alternative 7 would be similar to the Proposed Project due to the use of similar amounts of equipment and construction methods. Because noise sensitive receptors would be located similar distances from the Forum Alternative site as the Project Site, impacts associated with a temporary increase in noise during construction (Impacts 3.11-1 and 3.11-5) would be similar to the Proposed Project, and would still require the implementation of measures and controls to reduce noise during construction (Mitigation Measure 3.11-1). In addition, vibration levels under Alternative 7 would also be similar to the Proposed Project for the same reasons. As a result, vibration impacts with respect to structural damage and human annoyance (Impacts 3.11-3 and 3.11-6) would be similar, and 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.

As discussed above, the Forum Alternative site is located within the planning boundary/AIA established for LAX in the Los Angeles County ALUP, and the planning boundary/AIA is based in part on the 65 dBA CNEL contour included in the ALUP. Similar to the Proposed Project, the Arena and ancillary uses under Alternative 7 would generally be compatible with uses permitted on the site by the ALUP, and standard building construction practices for commercial structures would typically reduce interior noise levels to acceptable levels although some level of additional insulation may be appropriate, especially for the proposed medical clinic (Impacts 3.11-4 and 3.11-8). As a result, impacts related to aircraft noise would be similar to the Proposed Project.

Population, Employment and Housing

The implementation of Alternative 7 would result in the loss of existing jobs at The Forum, however new event related jobs would be created and could be occupied by current Forum

employees. Impacts related to Population, Employment and Housing (Impacts 3.12-1 through 3.12-4) would remain less than significant under Alternative 7, although employment generation on the Forum Alternative site would be reduced as the existing jobs at the Forum would be eliminated and no hotel would be constructed.

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 7. It should be noted that major events already occur at the Forum Alternative site throughout the year. Alternative 7 would likely increase the number of events that take place at the site, somewhat increasing the demands on police, fire, and parks services, because the existing Forum building would be demolished, the total demand for public services would be somewhat lower than under the Proposed Project.

Because employment on the Forum Alternative site would be reduced somewhat under Alternative 7, 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 7. As described in Table 3.13-9, the arena and commercial uses under Alternative 7 would be expected to generate a total of 49 new school students, a reduction of 1 elementary school student compared to the Proposed Project.

Utilities and Service Systems

The existing storm drain system in the area of the Forum Alternative site 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 7, 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.

Transportation

Alternative 7 would be of similar size to the Proposed Project, with a similar level of access to rail transit via shuttles for major events. As such, it is anticipated that vehicle trip generation for arena events and ancillary uses at the Alternative 7 site would be similar to that for the Proposed Project. This alternative would therefore be expected to have intersection and freeway facility impacts similar to those described for the Proposed Project, although the location of the Forum Alternative site about 0.8 miles north of the Project Site would distribute these impacts across the transportation system slightly differently. For example, more traffic and greater levels of congestion would occur along the Manchester Boulevard corridor, and less traffic and reduced levels of congestion would occur along the West Century Boulevard corridor.

Given that the Alternative 7 arena would have a capacity of 18,000 for NBA games and 18,500 for concerts and The Forum has a capacity of 17,500, the increased capacity of a sold out event at

this location would generate more person trips; however, the implementation of a shuttle system to rail transit (which is not provided for events at The Forum currently) could mean that vehicle trip generation and impacts would be slightly reduced from the trips and impacts generated by existing events currently occurring at The Forum.

Similar to the Proposed Project, Alternative 7 has the potential to impact on-time performance for buses operating in the vicinity because of congestion associated with event arrival and departure traffic.

The amount of on-site parking under Alternative 7 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, presumably at the HPSP as for the Proposed Project (and as for The Forum currently). As such, impacts associated with pedestrians crossing streets to walk to/from the parking could be similar to the Proposed Project.

The Alternative 7 site is located approximately two-thirds of a mile from the Centinela Hospital Medical Center. Impacts of the Project-related congestion on emergency access would generally be similar to those for the Proposed Project.

Impacts Identified as Being Less Severe than the Proposed Project

Aesthetics

The nearest light or shadow sensitive uses are residences located across Kareem Court, approximately 75 feet to the east, and residences located on East Nutwood Street, across South Prairie Avenue about 190 feet to the west. Under this alternative, the parking uses along Kareem Court would be unlikely to result in significant light impacts in the Carlton Square residences across Kareem Court. With the addition of Alternative 7 at this location, the distance to sensitive receptors to the west, across South Prairie Avenue, reduces the potential 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). Thus, impacts related to spillover lighting would be less than the impacts of the Proposed Project on adjacent sensitive receptors, and Mitigation Measures 3.1-2(a) through (c) would not be required for Alternative 7.

Air Quality and GHG

Air Quality and GHG emissions during operation under Alternative 7 would decrease as the existing Forum structure would be demolished and planned hotel on the East Transportation and Hotel Site and the new potable water well would be eliminated. In addition, the new arena on the Forum Alternative site, built to be consistent with current Title 24 requirements, would be more energy efficient than the existing Forum building, which was renovated in 2012 and can be expected to be consistent with prior versions of Title 24. Because the existing Forum building would be demolished, compared to the Proposed Project, fewer of the events that occur at the Alternative 7 arena would be net new; with over 100 events per year occurring at the Forum, and 47 of the anticipated 49 LA Clippers games currently taking place at Staples Center, more than

150 of the events that would occur at the Alternative 7 arena are already taking place in the air basin.

Similar to the Proposed Project, Alternative 7 would conflict with implementation of the applicable air quality plans, as operational emissions associated with the alternative, though reduced compared to the Proposed Project, would still exceed thresholds established by the SCAQMD for criteria air pollutants (Impact 3.2-1 and 3.2-5). Impacts associated with net new emissions of criteria air pollutants (Impacts 3.2-2 and 3.2-6), localized maximum daily operational emissions (NO₂) (Impacts 3.2-3 and 3.2-7), and GHG emissions (Impact 3.7-1 and 3.7-2) during operation would be reduced compared to the Proposed Project. Nevertheless, Alternative 7 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.

Energy Demand and Conservation

Energy demand during operation under Alternative 7 would be less than the Proposed Project as this alternative would involve demolition of the existing Forum building and 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).

Noise and Vibration

Traffic generated under Alternative 7 would be similar to the Proposed Project, but elimination of the existing Forum building would result in less overall traffic on the local roadway network. Thus, the impact associated with a permanent increase in noise during operation (Impacts 3.11-2 and 3.11-6) would be reduced, but would still require the implementation of Mitigation Measure 3.11-1(b), which would require the implementation of a Transportation Demand Management (TDM) program (Mitigation Measure 3.14-2(b)).

The outdoor stage under Alternative 7 would be positioned between the retail buildings to the south of the Arena. As a result, the impact due to operational sound from outdoor plaza events (Impacts 3.11-2 and 3.11-6) would be reduced as the amplified noise would be channeled by the retail buildings and directed to the south across Pincay Drive toward the NFL stadium and thus away from sensitive receptors to the west and east. Implementation of Mitigation Measure 3.11-2(a), which would require the preparation of a noise reduction plan major events, would still be required.

Transportation and Circulation

The Project at the Alternative 7 site could have a reduced level of impact on existing neighborhood streets since a grid network of residential streets only exists to the west of South Prairie Avenue and not to the east, north, or south of the Forum Alternative site.

The elimination of the hotel use would avoid the significant VMT impact identified for the Proposed Project's hotel use.

Alternative 7 would not be able to accommodate the combined events anticipated to occur at the Proposed Project and all of the events that currently occur at The Forum. Therefore, there would be a reduction in the net new Project-generated VMT on event days when there would otherwise have been an event at The Forum. To the extent that some existing events at The Forum are displaced and move to other venues in the region, there could be a reduction in regional VMT if such events are moved to a location with higher non-auto mode splits and shorter trip lengths (such as Staples Center) or to locations with a smaller capacity (such as the Hollywood Bowl). The VMT impacts, however, would still be significant.

Under Alternative 7, no concurrent events could occur involving events at the Proposed Project and events at The Forum. Therefore, impacts identified in Section 3.14 for Concurrent Event Scenario 1 (Major Events at Proposed Project and The Forum), Scenario 4 (Major Events at Proposed Project and The Forum and Midsize Event at NFL Stadium), and Scenario 5 (Major Events at Proposed Project and The Forum and Football Game at NFL Stadium) would be avoided. There would be no potential for concurrent events to occur in all three facilities (Proposed Project, The Forum, and NFL Stadium).

Because the frequency with which concurrent events occurs would be reduced because concurrent events at The Forum and at the Proposed Project would no longer occur, the likelihood of impacts to emergency access during concurrent events would be correspondingly reduced.

Utilities and Service Systems

Under Alternative 7, the existing Forum building would be demolished and the proposed hotel use would be eliminated, reducing the net new energy demand from Alternative 7 compared to the Proposed Project. Due to elimination of the proposed hotel, water demand of Alternative 7 would be approximately 20 percent lower than under the Proposed Project. Wastewater generation of Alternative 7 would be about 3 percent lower than under the Proposed Project. Solid waste generation would be approximately about 4 percent lower than under the Proposed Project.⁴⁹ 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 reduced compared to the Proposed Project, and would remain less than significant under both the Proposed Project and Alternative 7.

⁴⁹ Memorandum – IBEC Alternative 7 – Wastewater & Solid Waste Generation, August 23, 2019.

Impacts Identified as Being More Severe than the Proposed Project

Aesthetics

The Forum Alternative site would be developed with a visually more intensive level of development compared to existing conditions, with a larger arena structure, and other parts of the site which are currently surface parking lots developed with multi-story commercial and parking structures. Like the Project Site, the Forum Alternative site is located in an urbanized area, and the area in the vicinity of the does not have any scenic vistas, and in this regard visual impacts associated with Alternative 7 would be similar to those described for the Proposed Project (Impacts 3.1-1 and 3.1-4), although the changes to views north and south on South Prairie Avenue that would result from the construction of the Proposed Project pedestrian bridge would not occur under this alternative. However, the historic Forum building is a unique visual feature in the area, and its demolition and removal would be considered a significant degradation of the visual character in this part of Inglewood. Mitigation measures to address this impact would be the same as those described under Cultural Resources, below. However, because Alternative 7 necessitates the complete demolition and removal of the historic Forum building, this impact would be significant and unavoidable.

Cultural Resources

As described above, the Forum Alternative site is currently developed with The Forum, a National Register of Historic Places and California Register of Historical Resources-listed concert and event venue. The Forum was opened in 1967 and hosted major sporting events and other athletic competitions, concerts, and events, and until 1999 was the home of the NBA Los Angeles Lakers, the NHL Los Angeles Kings, and the WNBA Los Angeles Sparks, when all three professional sports teams left Inglewood and moved to the then-new Staples Center in downtown Los Angeles.

The Forum underwent comprehensive renovation and rehabilitation, completed in 2014, that included structural improvements to convert The Forum into a world-class concert and event venue. Also in 2014, The Forum was listed on the National Register of Historic Places and the California Register of Historic Resources as an architecturally significant historic property. As such it is an historical resource for the purposes of CEQA.

Under Alternative 7, The Forum would be demolished and elements of the Proposed Project would be developed on the 28-acre site. Demolition of an historical resource is considered a significant impact under CEQA. Demolition of an entire resource cannot be fully mitigated, and the impact would be considered to be significant and unavoidable. CEQA requires that feasible mitigation measures be prescribed. The following mitigation measures would reduce impacts:

- HABS Documentation – HABS Documentation shall be completed for The Forum prior to any demolition activities. The work shall be completed by a qualified architectural historian and photographer with experience in HABS Documentation.

- Display – The project applicant shall work with the City to develop displays for the new facility that tell the history of The Forum, including text and photographs. The displays shall be installed prior to the new facility being opened to the public.
- Salvage Plan – The project applicant shall hire a qualified professional (architectural historian or historic architect) to develop a Salvage Plan. The Salvage Plan shall be approved by the City prior to demolition activities.

Although these measures would lessen the impact of Alternative 7 on historical resources, the impact would not be fully mitigated and would be significant and unavoidable.

Air Quality and GHG Emissions

Air Quality and GHG emissions during construction would increase under Alternative 7 as it would involve a greater amount of demolition (i.e. the existing Forum structure) than the proposed project. Therefore, impacts associated with the emission of criteria air pollutants (Impacts 3.2-2 and 3.2-6) and GHG emissions (Impact 3.7-1 and 3.7-2) during construction would increase. As a result, air quality impacts during construction with respect emissions of criteria pollutants would be greater than the Proposed Project.

6.6 Alternatives Comparison and Environmentally Superior Alternative

In the evaluation of five 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. Section 15126.6 (e)(2) of the CEQA Guidelines 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 – the 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 2 would be the environmentally superior of alternatives that would be developed on the Project Site. It would avoid the most frequent of transportation impacts: those that would occur on non-event days. Due to this decreased weekday traffic, annual emissions of criteria air pollutants and GHGs would be correspondingly reduced. Nonetheless, this alternative would not avoid or lessen the impacts of the Proposed Project that would occur during peak conditions, before and after major events in the proposed arena, nor would it avoid or lessen the impacts associated with concurrent or overlapping events at the proposed arena, the NFL Stadium and/or The Forum.

Alternative 3, the City Services Center Alternative site, would lessen impacts related to intensity of development by eliminating some of the ancillary uses and by developing on a smaller site than the Proposed Project. In addition, by being located within walking distance of the LA Metro Crenshaw Line Downtown Inglewood station, it would maximize the opportunity to reduce overall trips through use of transit, avoiding the need for shuttles and TNCs to further congest City streets connecting attendees and employees from the transit system to the proposed arena. Further, it would move some of the most intense vehicular activity associated with arena events away from the most congested part of the City's arterial network along South Prairie Avenue, West Century Boulevard, and Manchester Boulevard, lessening to some extent the overlapping congestion and associated impacts on intersections, neighborhood streets, freeway facilities, and public transit that would be associated with concurrent events at the Proposed Project, NFL Stadium, and The Forum. While the impacts of such overlapping event conditions would be less severe at the Alternative 3 site than at the Project Site, or at the HPSP Alternative or Forum Alternative sites, these impacts would be greater than at the other alternative locations, such as the Baldwin Hills Alternative site or the District at South Bay Alternative site.

Alternative 4, the Baldwin Hills Alternative site, would have similar travel characteristics as the Proposed Project, but would be incrementally further away from the location of concurrent and overlapping events at the NFL Stadium and The Forum, avoiding most of the adverse effects of those conditions. However, due to conditions on and around the Baldwin Hills Alternative site, impacts on cultural and tribal cultural resources, and noise impacts on nearby residences would be greater than at the other alternative locations.

Alternative 5, the District at South Bay Alternative site, due to its greater distance from the Project Site, would fully avoid any of the transportation or other impacts (such as noise, lighting,

cultural and paleontological resources, etc.) that would affect resources on, or uses and streets around, the Project Site to an even greater degree than either Alternatives 3 and 4. However, this greater distance from the Project Site and the current location of LA Clippers games at Staples Center in downtown Los Angeles, would increase impacts associated with travel to and from the proposed arena, increasing VMT compared to the other alternatives, and corresponding to the increased VMT, there would be increased air pollutant and GHG emissions, and increased transportation energy demand compared to the other alternatives. Lastly, because of its former use as a landfill, there would be potential impacts at the District at South Bay Alternative site that would not occur at any of the other alternative sites or the Project Site.

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 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 PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.1 Aesthetics								
3.1-1: Construction and operation of the Proposed Project could substantially degrade the existing visual character or quality of public views of the site and its surroundings, or could conflict with the City's zoning and regulations governing scenic quality.	LS	NI	LS=	LS=	LS=	LS=	LS=	SU
3.1-2: Implementation of the Proposed Project could have the potential to create a new source of substantial light or glare which could adversely affect day or nighttime views in the area.	LSM	NI	LSM=	LSM=	LSM=	LSM=	LSM-	LSM-
3.1-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development, could substantially degrade the existing visual character or quality of public views of the site and its surroundings, or conflict with the City's zoning and regulations governing scenic quality.	LS	NI	LS=	LS=	LS=	LS=	LS=	SU
3.1-5: Construction and operation of the Proposed Project, in conjunction with other related cumulative development, could have the potential to cumulatively create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	LSM	NI	LSM=	LSM=	LSM=	LSM=	LSM-	LSM-
3.2 Air Quality								
3.2-1: Construction and operation of the Proposed Project would conflict with implementation of the applicable air quality plan.	SUM	NI	SUM-	SUM-	SUM-	SUM+	SUM-	SUM-

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.2-2: Construction and operation of the Proposed Project would result in a cumulatively considerable net increase in VOC and NOx emissions during construction, and a cumulatively considerable net increase in VOC, NOx, CO, PM10, and PM2.5 during operation of the Proposed Project.	SUM	NI	SUM-	SUM-	SUM-	SUM+	SUM-	SUM-/+
3.2-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, result in inconsistencies with implementation of applicable air quality plans.	SUM	NI	SUM-	SUM-	SUM-	SUM+	SUM-	SUM-
3.2 Air Quality (cont.)								
3.2-6: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would result cumulative increases in short-term (construction) and long-term (operational) emissions.	SUM	NI	SUM-	SUM-	SUM-	SUM+	SUM-	SUM-/+
3.3 Biological Resources								
3.3-2: Construction of the Proposed Project could have the potential to interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM-	LSM=
3.3-3: Construction of the Proposed Project could have the potential to conflict with local policies or ordinances protecting biological resource, such as a tree preservation policy or ordinance.	LSM	NI	LSM=	LSM=	LSM-	LSM-	LSM-	LSM=

**TABLE 6-2
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3.4 Cultural and Tribal Resources								
3.4-1: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	LSM	NI	LSM=	LSM=	LSM+	LSM-	LSM=	SU=/+
3.4-2: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	LSM	NI	LSM=	LSM=	LSM+	LSM-	LSM=	LSM=

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.4 Cultural and Tribal Resources (cont.)								
<p>3.4-3: Construction of the Proposed Project could have the potential to cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:</p> <ul style="list-style-type: none"> i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k). ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. 	LSM	NI	LSM=	LSM=	LSM+	LSM-	LSM=	LSM=
<p>3.4-4: Construction of the Proposed Project could have the potential to disturb human remains including those interred outside of dedicated cemeteries.</p>	LSM	NI	LSM=	LSM=	LSM+	LSM-	LSM=	LSM=

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.4 Cultural and Tribal Resources (cont.)								
3.4-5: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could result in cumulatively considerable impacts to historical resources.	LSM	NI	LSM=	LSM=	LSM+	LSM-	LSM=	LSM=
3.4-6: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on archaeological resources.	LSM	NI	LSM=	LSM=	LSM+	LSM-	LSM=	LSM=
3.4-7: Construction of the Proposed Project, in conjunction with construction of other cumulative development, could have the potential to contribute to cumulative impacts on the significance of a Tribal cultural resource, defined in Public Resources Code Section 21074.	LSM	NI	LSM=	LSM=	LSM+	LSM-	LSM=	LSM=
3.4-8: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could have the potential to contribute to cumulative impacts on human remains including those interred outside of dedicated cemeteries.	LSM	NI	LSM=	LSM=	LSM+	LSM-	LSM=	LSM=
3.5 Energy Demand and Conservation								
There are no significant project or cumulative impacts related to Energy Demand and Conservation.								

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.6 Geology and Soils								
3.6-1: Construction and operation of the Proposed Project could have the potential to result in the substantial erosion or the loss of topsoil.	LSM	NI	LSM=	LSM=	LSM=	LSM=	LSM=	LSM=
3.6-2: Construction of the Proposed Project could have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM=	LSM=
3.6-3: Construction and operation of the Proposed Project in conjunction with other cumulative projects, could result in substantial erosion or loss of topsoil.	LSM	NI	LSM=	LSM=	LSM=	LSM=3	LSM=	LSM=
3.6-4: Construction of the Proposed Project, in conjunction with construction of other cumulative projects, could contribute to cumulative impacts on paleontological resources.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM=	LSM=
3.7 Greenhouse Gas Emissions								
3.7-1: Construction and operation of the Proposed Project could generate "net new" GHG emissions, either directly or indirectly, that could have a significant impact on the environment.	LSM	NI	LSM-	LSM-	LSM-	LSM+	LSM-	LSM-/+
3.7-2: Construction and operation of the Proposed Project could have the potential to be inconsistent with applicable plans, policies and regulations adopted for the purpose of reducing the emissions of GHGs.	LSM	NI	LSM-	LSM-	LSM-	LSM+	LSM-	LSM-/+

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

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3.8 Hazards and Hazardous Materials								
3.8-4: Construction and operation of the Proposed Project would 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, could have the potential to create a significant hazard to the public or the environment.	LSM	NI	LSM=	LSM=	LSM=	LSM+	LSM=	LSM=
3.8-5: Construction and operation of the Proposed Project would be located within an airport land use plan area and could result in a safety hazard or excessive noise for people residing or working in the project area or could create a hazard to navigable airspace and/or operations at a public airport.	LSM	NI	LSM=	NI	NI	NI	LSM=	LSM=
3.9 Hydrology and Water Quality								
3.9-1: Construction and operation of the Proposed Project could have the potential to violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality, or conflict with or obstruct implementation of a water quality control plan.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM=	LSM=

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.9 Hydrology and Water Quality (cont.)								
3.9-3: Construction and operation of the Proposed Project could have the potential to substantially alter the existing drainage patterns of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which has the potential to: result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flow.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM=	LSM=
3.9-4: Construction and operation of the Proposed Project, in conjunction with other cumulative development within the Dominguez Channel Watershed, could have the potentially to cumulatively violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM=	LSM=

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.9 Hydrology and Water Quality (cont.)								
3.9-6: Construction and operation of the Proposed Project, in conjunction with other cumulative development in the Dominguez Channel Watershed, could have the potential to cumulatively alter the drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flow.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM=	LSM=
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=

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.11 Noise (cont.)								
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 and operation of the Proposed Project, in conjunction with and other cumulative development, could generate excessive groundborne vibration.	LSM	NI	LSM-	LSM-	LSM=	LSM-	SUM=	SUM=
3.12 Population, Employment and Housing								
There are no significant project or cumulative impacts related to Population, Employment and Housing.								
3.13 Public Services								
There are no significant project or cumulative impacts related to Public Services.								

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.14 Transportation and Circulation								
3.14-1: Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under Adjusted Baseline conditions.	SUM	NI	NI-	SUM-	SUM-	SUM-	SUM=	SUM=
3.14-2: Daytime events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM=	SUM-	SUM-	SUM=	SUM=
3.14-3: Major events at the Proposed Project Arena would cause significant impacts at intersections under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM=	SUM=-/	SUM-	SUM=	SUM=
3.14-4: Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.	SUM	NI	NI-	SUM=-/+	SUM-	SUM-	SUM-	SUM-
3.14-5: Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM=/+	SUM=-/	SUM-	SUM-	SUM-
3.14-6: Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM=/+	SUM=-/	SUM-	SUM-	SUM-
3.14-7: Operation of the Proposed Project ancillary land uses could cause significant impacts on freeway facilities under Adjusted Baseline conditions.	LS	NI	NI-	LS=	LS=	LS=	LS=	LS=

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.14 Transportation and Circulation (cont.)								
3.14-8: Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM=	SUM-	SUM=	SUM=	SUM=
3.14-9: Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM=	SUM=-/	SUM=	SUM=	SUM=
3.14-10: Certain components of the Proposed Project would generate VMT in excess of applicable thresholds.	SUM	NI	SUM-	SUM-	SUM-	SUM-/+	SUM-	SUM-
3.14-11: Operation of the Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM=	SUM=	SUM=	SUM=	SUM=
3.14-12: The Proposed Project could adversely affect existing or planned bicycle facilities; or fail to adequately provide for access by bicycle.	LS	NI	LS=	LS-	SU+	SU+	LS=	LS=
3.14-13: The Proposed Project could adversely affect existing or planned pedestrian facilities; or fail to adequately provide for access by pedestrians.	LSM	NI	LSM=-/	LSM-	LSM=	LSM-	LS-	LSM-
3.14-15: The Proposed Project would substantially affect circulation for a substantial duration during construction under Adjusted Baseline conditions.	SUM	NI	SUM=	SUM=	SUM=	SUM=	SUM=	SUM=

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.14 Transportation and Circulation (cont.)								
3.14-16: Operation of the Proposed Project ancillary land uses would cause significant impacts at intersections under cumulative conditions.	SUM	NI	NI-	SUM-	SUM-	SUM-	SUM=	SUM=
3.14-17: Daytime events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions.	SUM	NI	SUM=-/	SUM=	SUM-	SUM-	SUM=	SUM=
3.14-18: Major events at the Proposed Project Arena would cause significant impacts at intersections under cumulative conditions.	SUM	NI	SUM=-/	SUM=	SUM=-/	SUM-	SUM=	SUM=
3.14-19: Operation of the Proposed Project ancillary land uses would cause significant impacts on neighborhood streets under cumulative conditions.	SUM	NI	NI-	SUM=-/+	SUM-	SUM-	SUM-	SUM-
3.14-20: Daytime events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions.	SUM	NI	SUM=-/	SUM=+/	SUM-	SUM-	SUM-	SUM-
3.14-21: Major events at the Proposed Project Arena would cause significant impacts on neighborhood streets under cumulative conditions.	SUM	NI	SUM=-/	SUM=+/	SUM=-/	SUM-	SUM-	SUM-

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

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3.14 Transportation and Circulation (cont.)								
3.14-22: Operation of the Proposed Project ancillary land uses could cause significant impacts on freeway facilities under cumulative conditions.	LS	NI	NI-	LS=	LS=	LS=	LS=	LS=
3.14-23: Daytime events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions.	SUM	NI	SUM=-/	SUM=	SUM-	SUM=	SUM=	SUM=
3.14-24: Major events at the Proposed Project Arena would cause significant impacts on freeway facilities under cumulative conditions.	SUM	NI	SUM=-/	SUM=	SUM=-/	SUM=	SUM=	SUM=
3.14-25: The Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.	SUM	NI	SUM=-/	SUM=	SUM=	SUM=	SUM=	SUM=
3.14-26 The Proposed Project could result in inadequate emergency access under cumulative conditions.	LSM	NI	LSM=-/	LSM-	LS=	LS-	LSM=	LSM=
3.14-27: The proposed project would substantially affect circulation for a substantial duration during construction under cumulative conditions.	SUM	NI	SUM=	SUM=	SUM=	SUM=	SUM=	SUM=
3.14-28: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM-	SUM-	SUM-	SUM-	SUM-

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.14 Transportation and Circulation (cont.)								
3.14-29: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on freeway facilities under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM-	SUM-	SUM-	SUM-	SUM-
3.14-30: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would adversely affect public transit operations or fail to adequately provide access to transit under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM-	SUM-	SUM-	SUM-	SUM-
3.14-31: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would result in inadequate emergency access under Adjusted Baseline conditions.	SUM	NI	SUM=-/	SUM-	LS-	LS-	SUM-	SUM-
3.14-32: The Proposed Project would substantially affect circulation for a substantial duration during construction during major events at The Forum and/or the NFL Stadium under Adjusted Baseline conditions.	SUM	NI	SUM=	SUM=	SUM-	SUM-	SUM-	SUM-
3.14-34: Major events at the Proposed Project's Arena, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on neighborhood streets under Baseline conditions.	SUM	NI	SUM=-/	SUM=-/+	SUM=-/	SUM-		

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.14 Transportation and Circulation (cont.)								
3.14-33: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts at intersections under cumulative conditions.	SUM	NI	SUM=-	SUM-	SUM-	SUM-	SUM-	SUM-
3.14-34: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would cause significant impacts on freeway facilities under cumulative conditions.	SUM	NI	SUM=-	SUM-	SUM-	SUM-	SUM-	SUM-
3.14-35: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would adversely affect public transit operations or fail to adequately provide access to transit under cumulative conditions.	SUM	NI	SUM=-	SUM-	SUM-	SUM-	SUM-	SUM-
3.14-36: Major events at the Proposed Project, when operating concurrently with major events at The Forum and/or the NFL Stadium, would result in inadequate emergency access under cumulative conditions.	SUM	NI	SUM=-	SUM-	LS-	LS-	SUM-	SUM-
3.14-37: The Proposed Project would substantially affect circulation for a substantial duration during construction during major events at The Forum and/or the NFL Stadium under cumulative conditions.	SUM	NI	SUM=	SUM=	SUM-	SUM-	SUM-	SUM-

**TABLE 6-2
PROJECT ALTERNATIVES SIGNIFICANT IMPACT COMPARISON**

Impact PRELIMINARY DRAFT – TO BE COMPLETED AFTER FINAL REVISIONS TO TECHNICAL SECTIONS	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project Size	Alternative 3: Different Location – City Yard	Alternative 4: Different Location – Baldwin Hills	Alternative 5: Different Location – Carson	Alternative 6: Different Location – Hollywood Park	Alternative 7: Different Location – The Forum
3.15 Utilities and Service Systems								
3.15-9: Construction and operation of the Proposed Project could have the potential to require or result in the relocation or construction of new or expanded storm water drainage facilities or expansion of existing facilities, the construction or relocation of which could have the potential to cause significant environmental effects.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM-	LSM=
3.15-10: Construction and operation of the Proposed Project, in conjunction with other cumulative projects, could result in the relocation or construction of new storm water drainage facilities or expansion of existing facilities, the construction or relocation of which could have the potential to cause significant environmental effects.	LSM	NI	LSM=	LSM=	LSM=	LSM-	LSM-	LSM=
<p>NOTES:</p> <p>NI – No Impact LS – Less than significant LSM – Less than significant after application of feasible mitigation measure(s). SU – Significant and unavoidable and no feasible mitigation is identified</p> <p>SUM – Significant and unavoidable after application of available mitigation measure(s). - = Impact is less severe than under the Proposed Project = = Impact is the same as under the Proposed Project + = Impact is more severe than under the Proposed Project</p>								