

# CHAPTER 4

---

## Other CEQA-Required Considerations

### 4.1 Introduction

CEQA Guidelines section 15126 requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Further, CEQA Guidelines section 15126.2(a) requires that the evaluation of significant impacts consider direct and reasonably foreseeable indirect effects of the Proposed Project over the short-term and long-term. The EIR must identify (1) significant environmental effects of the Proposed Project, (2) potentially feasible mitigation measures proposed to avoid or substantially lessen significant effects, (3) significant environmental effects that cannot be avoided if the Proposed Project is implemented, (4) significant irreversible environmental changes that would result from implementation of the Proposed Project, (5) growth-inducing impacts of the Proposed Project, and (6) alternatives to the Proposed Project.<sup>1</sup>

Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, Sections 3.1 through 3.15, of the EIR provide a comprehensive presentation of the Proposed Project's environmental effects, potentially feasible mitigation measures, and conclusions regarding the level of significance of each impact both before and after mitigation.

Chapter 5, Project Variants, provides descriptions and analysis of environmental impacts for two variations of the Proposed Project. Project Variants are included and considered in the CEQA-required analyses discussions below.

Chapter 6, Project Alternatives, presents a comparative analysis of alternatives to the Proposed Project.

The other CEQA-required analyses described above are presented below.

### 4.2 Significant Environmental Effects That Cannot Be Avoided if the Proposed Project Is Implemented

CEQA Guidelines section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The significant environmental impacts of the Proposed Project, West Century Boulevard Pedestrian Bridge

---

<sup>1</sup> CEQA Guidelines sections 15126.2(a), (c-e), 15126.4, and 15126.6.

Variant, and Alternate Prairie Access Variant are discussed in detail in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, and in Chapter 5, Project Variants.

## 4.2.1 Unavoidable Significant Impacts of the Proposed Project

### Proposed Project

Project-specific and cumulative impacts that cannot be avoided if the Proposed Project is approved as proposed include:

#### ***Project-Specific Significant and Unavoidable Impacts***

**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<sub>x</sub> emissions during construction, and a cumulatively considerable net increase in VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> during operation of the Proposed Project.

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

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

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

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

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

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

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

**Impact 3.14-9:** Major events at the Proposed Project 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:** Operation of the Proposed Project would adversely affect public transit operations or fail to adequately provide access to transit under Adjusted Baseline conditions.

**Impact 3.14 15:** The Proposed Project would substantially affect circulation for a substantial duration of construction under Adjusted Baseline 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 under Adjusted Baseline 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, would result in inadequate emergency access under Adjusted Baseline conditions.

**Impact 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.

### ***Cumulative Significant and Unavoidable Impacts***

**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.

**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.

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

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

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

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

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

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

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

**Impact 3.14-24:** Major events at the Proposed Project 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 3.14-27:** The Proposed Project would substantially affect circulation for a substantial duration of construction under cumulative conditions.

**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.

**Impact 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.

**Impact 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.

## 4.2.2 Unavoidable Significant Impacts of the West Century Boulevard Pedestrian Bridge Variant

The changes to the Proposed Project that would be included in the West Century Boulevard Pedestrian Bridge Variant would not change or would not be substantial enough to change the conclusions, or add or alter significant impacts previously discussed in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. Therefore, Project-specific and cumulative impacts that cannot be avoided if the West Century Boulevard Pedestrian Bridge Variant is approved as proposed would be the same as those identified for the Proposed Project, in Section 4.2.1, above.

## 4.2.3 Unavoidable Significant Impacts of the Alternate Prairie Access Variant

The changes to the Project that would be included in the Alternate Prairie Access Variant would not change or would not be substantial enough to change the conclusions, or add or alter significant impacts previously discussed in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. Therefore, Project-specific and cumulative impacts that cannot be avoided if the Alternate Prairie Access Variant is approved as proposed would be the same as those identified for the Proposed Project, in Section 4.2.1, above.

### 4.3 Significant Irreversible Environmental Changes That Would Be Caused by the Proposed Project Should It Be Implemented

Under CEQA, an EIR must evaluate the extent to which the Proposed Project primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage. Specifically, CEQA Guidelines section 15126.2(d) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

The evaluation below addresses whether the Proposed Project would result in significant irreversible environmental changes if they would:

- Involve a large commitment of nonrenewable resources;
- Result in primary or secondary impacts that would generally commit future generations to similar uses;
- Involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- Result in consumption of resources that is not justified (e.g., the project involves the wasteful use of energy).

Each of these issues is discussed below for the Proposed Project.

#### Large Commitment of Resources

Implementation of the Proposed Project would result in the long-term commitment of resources to continued urban development. As is described previously in Chapter 1, Introduction, Chapter 3, Sections 3.4, Cultural and Tribal Cultural Resources, and 3.10, Land Use and Planning, of this Draft EIR, the Project Site was originally developed for and committed to urban uses starting in the late 1920s and continuing on into the post-World War II years. In the 1950s and 1960s, single family homes were redeveloped to more intensive multi-family housing and industrial uses. Beginning in the mid-1980s, the City received FAA-issued noise mitigation grants as part of the LAX Noise Control/Land Use Compatibility Program, with the objective of disposing and recycling incompatible land uses to land uses which are compatible with the noise levels of airport operations. As a result, much of the Project Site was cleared to eliminate noise-sensitive uses that were considered incompatible with the aviation noise from aircraft approaching and departing from LAX, to the west. The Proposed Project would recommit the land resources of the site to urban development compatible with the ambient noise environment.

In addition, construction activities related to the Proposed Project would result in the irretrievable commitment of construction materials (e.g., steel products, cement, glass, etc.).

### **Commitment of the Project Site for Future Generations**

Development of the Proposed Project would result in the commitment of the Project Site to a sports and entertainment venue use along with accompanying commercial, hotel, and parking uses, thereby precluding other uses for the lifespan of the Proposed Project or Project Variants, a period of time anticipated to be at least 30 years.

### **Irreversible Environmental Damage**

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage that could be caused by an accident associated with the Proposed Project. While the Proposed Project could result in the use, transport, storage, and disposal of limited amounts of hazardous wastes during construction and operation, as described in Section 3.8, Hazards and Hazardous Materials, all activities would comply with applicable state and federal laws related to hazardous materials, which significantly reduce the likelihood and severity of the occurrence of accidents that could result in irreversible environmental damage.

Over the past decade, the understanding of global climate change and the role that communities can play in mitigating and/or adapting to it has grown tremendously. There is broad scientific consensus that recent changes in climatic conditions, including increases in global temperatures, are associated with corresponding increases of greenhouse gases (GHGs). Temperature increases are beginning to affect regional climates and continued increases are expected result in impacts to the southern California region and the world. Climate change is anticipated to have profound implications for the availability of the natural resources on which economic prosperity and human development depend.

As discussed in detail in Section 3.7, Greenhouse Gas Emissions, the emission of GHGs is known to have long-term effects on atmospheric conditions that affect the global climate, with resultant changes in sea level, hydrological conditions in rivers, heat island effects, and a range of other conditions. While these changes are not considered irreversible, they could last for generations. As further described in Section 3.7, Greenhouse Gas Emissions, the Proposed Project could result in short-term increases in GHG emissions, but through the implementation of mitigation measures, including those required pursuant to the requirements of Public Resources Code section 21168.6.8 (AB 987) as well as additional measures identified in this Draft EIR, would result in no net increase in GHG emissions. As such, the Proposed Project would not contribute to global climate changes and related irreversible environmental damage.

The most notable significant irreversible impacts of the Proposed Project or Project Variants are intensification of the visual character of the Project Site, increased generation of pollutants from vehicle travel and stationary operations, and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources, such as water and energy resources used during construction activities. Operations associated with future uses would also consume water, natural

gas and electrical energy. The unavoidable environmental consequences of the Proposed Project are described in the appropriate sections in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, and Section 4.2, above.

### **Unjustified Consumption of Resources**

Resources that would be permanently and continually consumed by implementation of the Proposed Project include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources (see Chapter 3, Sections 3.5, Energy Demand and Conservation, and 3.15, Utilities and Service Systems). Table 3.5-4, Annual Energy Use During Project Operation of Section 3.5, describes the net new energy demand for the Proposed Project as 14,774 megawatt hours (MWh) of electricity, 18,631 MMBtu of natural gas, 739,555 gallons of gasoline, and 70,798 gallons of diesel fuel. In addition, electricity and fossil fuels would also be consumed in the use of vehicles and equipment during construction of the Proposed Project.

#### ***Project Construction***

Consumption of non-renewable fossil fuels during construction of the Proposed Project is described in Section 3.5, Energy Demand and Conservation. Construction of the Proposed Project would result in the irretrievable commitment of construction materials (e.g., steel products, cement, glass). While construction of the Proposed Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment, the consumption of fossil fuels would occur on a temporary basis during the construction period.

Construction of the Proposed Project would employ fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with the CARB Pavley Phase II standards, the anti-idling regulation in accordance with section 2485 in Title 13 of the CCR, and fuel requirements for stationary equipment in accordance with section 93115 (concerning Airborne Toxic Control Measures) in Title 17 of the CCR. Use of construction equipment that is compliant with these regulations would result the use of more fuel-efficient engines and associated fuel savings.

The Proposed Project would divert mixed construction and demolition debris to City-certified construction and demolition waste processors using City-certified waste haulers, which would reduce truck trips to landfills, and increase the amount of waste recovered (e.g., recycled, reused, etc.) at material recovery facilities, thereby further reducing transportation fuel consumption. As such, the consumption of energy during project construction would not be wasteful, inefficient, or unnecessary.

#### ***Project Operation***

Operation of the Proposed Project would result in the demand for electricity and natural gas for project operations, and gasoline and diesel fuel for transportation and backup generation functions. As described in Section 3.5, Energy Demand and Conservation, the future electricity

use of the Proposed Project would represent about 0.014 percent of total SCE sales and would be within SCE's projected electricity supplies. The Proposed Project would result in an annual net increase in demand for natural gas of approximately 18,631 MMBtu, accounting for approximately 0.002 percent of the 2024 forecasted annual consumption in SoCalGas' planning area. This new demand would fall within SoCalGas' projected consumption for the area and would be consistent with SoCalGas' anticipated regional demand from population or economic growth. As reported in Table 3.5-4, the Proposed Project estimated annual net increase in petroleum-based fuel usage would be approximately 1,01,301 gallons of gasoline and 66,983 gallons of diesel. The Proposed Project would account for 0.028 percent of County-wide gasoline consumption and 0.011 percent of County-wide diesel consumption, based on the available County fuel sales data for the year 2017.

Operation of the Proposed Project would comply with all applicable building codes, including the 2019 Title 24 building energy efficiency standards, CAFE fuel economy standards, consistency with the SCAG 2016-40 RTP/SCS, achievement of LEED Gold status through design and operations of the Proposed Project, compliance with the County's Low Impact Development (LID) Development Standards Manual, compliance with the City's Low Impact Development Requirements for New Development and Redevelopment,<sup>2</sup> the City's Green Street Policy, the City's Water Conservation and Water Supply Shortage Program, as well as mitigation measures included in this Draft EIR, would ensure that natural resources are used efficiently and conserved to the maximum extent possible. Further, it is expected that, over time, new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. For example, future implementation of the Clean Fuel Standard and the Renewable Portfolio Standard are expected to decrease the use of nonrenewable fossil fuels.

The Proposed Project would incorporate a variety of measures and features to reduce electricity use and minimize natural gas demand, including achieving USGBC LEED Gold Certification level. As described in Chapter 2, Project Description, several sustainable design features are under consideration for inclusion for the Proposed Project, including but not limited to, heat island reduction measures, light pollution reduction measures, indoor and outdoor water reduction measures, renewable energy production, and optimized energy performance. More specifically, the Proposed Project would incorporate a variety of energy and water conservation measures and features to minimize energy demand; these measures would include reducing indoor water use by 40 percent and outdoor water use by 50 percent, which would be elements of the Proposed Project effort to achieve USGBC LEED Gold certification.

In order to reduce the use of transportation energy, the Proposed Project would comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Proposed Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards which are designed to reduce vehicle GHG emissions, but would

---

<sup>2</sup> City of Inglewood Municipal Code, Chapter 10, Article 16, Section 10-208.

also result in fuel savings in addition to compliance with CAFE standards. The close proximity of the Proposed Project to retail, restaurant, entertainment, commercial, and job destinations support achievement of reductions in VMT. Additionally, the Proposed Project design would provide for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations for a minimum of 8 percent of the parking spaces pursuant to the CALGreen Code, reducing the amount of fossil fuel consumed during vehicular travel to and from the project site.

Collectively, the incorporation of the above described conservation measures and features, operation of the Proposed Project would minimize the consumption of electricity, natural gas, and transportation fuels. Therefore, as proposed operation of the Proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and transportation fuels, and thus would not result in the unjustified consumption of natural resources.

## 4.4 Growth-Inducing Effects

As required CEQA Guidelines section 15126.2(e), an EIR must discuss ways in which a project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, an EIR must discuss the characteristics of a project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. The purpose of this section is to evaluate the potential growth-inducing effects resulting from the implementation of the Proposed Project or Project Variants in the greater Los Angeles area. Additional analysis of the effects of the Proposed Project or Project Variants on population and employment growth is provided in Section 3.12, Population, Employment, and Housing, and in Chapter 5, Project Variants.

In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public service, the provision of the new access to or infrastructure capacity that serves an area; a change in zoning or general plan designations that increase density for areas outside the boundaries of a project site); or indirectly stimulates economic expansion or growth that occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.). These circumstances are further described below:

- **Elimination of Obstacles to Growth:** This refers to the potential for a project to remove infrastructure limitations or provide infrastructure capacity, or remove regulatory constraints that could result in growth unforeseen at the time of project approval; and
- **Economic Effects:** This refers to the potential for a project to cause increased activity in the local or regional economy. Economic effects can include such effects as the Multiplier Effect. A “multiplier” is an economic term used to describe inter-relationships among various sectors of the economy. The Multiplier Effect provides a quantitative description of the direct employment effect of a project, as well as indirect and induced employment growth. The

multiplier effect recognizes that the onsite employment and population growth of each project may not be the complete picture of growth caused by the project.

#### 4.4.1 Elimination of Obstacles to Growth

The elimination of physical obstacles to growth is considered a growth-inducing effect. The Project Site is located in a highly urbanized area in the vicinity of other facilities designed to accommodate large sporting and entertainment events. Common factors that limit growth include limited capacities of local or regional utility infrastructure, such as storm drainage systems, or wastewater conveyance and treatment systems. Transportation infrastructure can also be a factor that limits growth.

The Project Site is located within a fully urbanized landscape, with extensive transportation and utility infrastructure designed to accommodate urban development in the City of Inglewood and the larger South Bay region. The Proposed Project would include localized circulation improvements, such as the retiming of traffic signals, construction of one or more pedestrian bridge, and improvement of sidewalks and crosswalks in and around the Project Site frontage, which would be designed to facilitate Project-related circulation and would not substantially expand the capacity of area roadways. As described in Section 3.15, Utilities and Service Systems, existing service systems for water supply, wastewater, and storm drainage are either currently adequate to serve the Proposed Project, or would require improvements to accommodate the Proposed Project. Such improvements would not be sized to provide substantial excess capacity beyond what is needed to serve the Proposed Project.

The Project Site includes parcels that are currently a combination of vacant or developed land, and is surrounded by urban uses. As described above, the primary potential obstacle to growth is the transportation and utility infrastructure that serve the Project site. The Proposed Project would be served by transportation and circulation infrastructure and utility systems that already exist or would be subject to improvements to accommodate the project-related demands. These improvements would not expand the capacity of local infrastructure to the extent that current constraints to development in surrounding areas would be eliminated. As such, the Proposed Project would not eliminate obstacles to further growth in the City of Inglewood or surrounding areas.

#### 4.4.2 Economic Effects

##### Project Employment

Section 3.12, Population, Employment, and Housing, describes potential employment on the project site as totaling 993 full-time equivalent jobs, including 768 non-event jobs and 225 full-time-equivalent event-related jobs. The approximately 119 existing onsite jobs would be eliminated with the current uses on the project site. Therefore, the Proposed Project would result in a net increase of approximately 874 full-time-equivalent jobs within the City.

As is presented in Table 2-4 of Chapter 2, the Proposed Project would include 768 non-event jobs, including 254 full-time-equivalent LA Clippers employees being relocated from other

places of work in the LA metropolitan area. The Proposed Project Arena would employ approximately 75 new full time arena operations and maintenance employees. As Staples Center would continue to operate, these 75 employees would represent new jobs added by the Proposed Project. In addition to the employees of the LA Clippers and the proposed arena operator, the Proposed Project would add approximately 439 new jobs, including approximately 112 restaurant jobs, 216 retail jobs, 35 sports medicine jobs, 26 jobs associated with the community space, and 50 hotel jobs. The LA Clippers currently employ approximately 254 employees in a variety of positions supporting the team's basketball and business operations; it is unlikely that this level of employment would change. This level of employment represents a conservative estimate of employment at the Project Site since a number of these jobs are either remote (e.g., team scouts that work across the nation or internationally), or involve substantial amounts of travel both during the NBA season and off-season (e.g., players and coaches) and thus are not located at the Project Site on a year-round basis.

The Proposed Project would also include approximately 225 full-time-equivalent jobs, comprised of part-time event employment that could vary depending on the type of event (see Section 3.12, Table 3.12-8). As shown in Chapter 2, Table 2-3, event employment would range from a low of approximately 25 employees for the estimated over 100 small civic and corporate events, to as many as approximately 1,200 for basketball games and other large events. For NBA basketball games, an additional 120 LA Clippers employees would be present working on aspects of the game operations. Based on analysis of the estimated event employment by event type, and the number and frequency of events (see Chapter 2, Table 2-3), the estimated arena event employment represents approximately 225 full-time-equivalent jobs (see Table 4-1, below).

## Multiplier Effect

In addition to the employment growth generated by the Proposed Project, additional employment could be generated in the local and regional economy through what is commonly referred to as the "Multiplier Effect." The Multiplier Effect generally refers to the secondary economic effects caused by spending from Project-generated residents and employees and resulting in additional employment in the local and regional economy; because neither the Proposed Project nor Project Variants include residential uses, this analysis only considers the effects of Project-related employees. The Multiplier Effect tends to be greater in regions with larger diverse economies due to a decrease in the requirement to import goods and services from outside the region, as compared to the effects of spending in smaller economies where goods and services must be imported from elsewhere. Because the Project Site is located in the Los Angeles metropolitan area, a large, diverse, and complex economy, the Multiplier Effect would tend to be greater than if the Proposed Project or Project Variants were constructed and operated in a smaller region.

Two different types of secondary economic effects (additional employment) are tracked through the Multiplier Effect. *Indirect* employment includes those additional jobs that are generated through the expenditure patterns of residents and direct employment associated with the Proposed Project. For example, future workers at the proposed arena and in the hotel and retail portions of the Proposed Project would spend money in the local economy, and the expenditure of that

money would result in additional jobs. Indirect jobs tend to be in relatively close proximity to the places of employment and residence because that is where people typically spend money on groceries and their other day-to-day needs.

The multiplier effect also calculates *induced* employment. Induced employment follows the economic effect of employment beyond the expenditures of the employees within the area surrounding the Project Site to include jobs created by the stream of goods and services necessary to support businesses within that area. For example, when the Proposed Project or its vendors buys products or sells products, the employment associated with those purchases or sales (inputs or outputs) are considered *induced* employment. As an additional example, when an employee from the Proposed Project goes out to lunch, the person who serves that Project-employee lunch holds a job that was *indirectly* caused by the Proposed Project. When that server then spends money in the economy, the jobs generated by this third-tier effect are considered *induced*.

In Chapter 2, Project Description, it is estimated that the mixed-use development in the Proposed Project would relocate 254 existing LA Clippers employees from their current places of employment to the City of Inglewood, and would result in an increase in direct employment of 514 new non-event jobs in arena operations and maintenance, as well as the retail, restaurant, sports medicine and other new uses at the Project Site. When added to the 225 full time equivalent event-related jobs, there would be a total of 739 new direct full-time equivalent jobs as a result of the Proposed Project. As is presented below, in **Table 4-1**, the indirect and induced employment growth associated with the increased employment in the Proposed Project would add an additional 440 jobs in the Los Angeles metropolitan regional economy, which, when added to the direct full time equivalent jobs, would bring the total increase in jobs associated with the Proposed Project to 1,179 jobs.

### 4.4.3 Environmental Effects of Induced Growth

While economic and employment growth at the Project Site is an intended consequence of the Proposed Project or Project Variants, growth induced directly and indirectly by the Proposed Project or Project Variants could also affect the greater region. Increased future employment generated by employee spending ultimately results in physical development of space to accommodate those employees. It is the characteristics of this developed physical space at a specific location that determines the type and magnitude of environmental impacts of this additional economic activity.

Depending on its location and design, potential effects caused by induced growth in the region could include: increased traffic congestion; increased air pollutant emissions; loss of open space; loss of habitat and associated flora and fauna; increased demand on public utilities and services, such as fire and police protection, water, recycled water, wastewater, solid waste, energy, and natural gas; and increased demand for housing.

**TABLE 4-1  
INDIRECT AND INDUCED EMPLOYMENT**

Employment Description	IMPLAN Employment Type	Net New Direct Employment	Indirect		Induced		Total Indirect + Induced Employment	Total Employment
			Type I Multiplier <sup>a</sup>	Change from Direct	Type II Multiplier <sup>a</sup>	Change from Indirect		
Arena Operations and Management	Promoters of performing arts and sports and agents for public figures (491)	75 <sup>b</sup>	1.7684	58	1.5297	31	89	<b>164</b>
Arena Event Employment	Promoters of performing arts and sports and agents for public figures (491)	225 <sup>c</sup>	1.7684	173	1.5297	92	265	<b>490</b>
Restaurant	Full Service Restaurant (501)	112	1.1330	15	1.1523	2	17	<b>129</b>
Retail (Shopping Center/Retail/Arena and Plaza Experience)	Retail – Sporting goods, hobby, and book stores (404)	216	1.1139	25	1.1755	4	29	<b>245</b>
Sports Medicine Clinic	Other health care services (466)	35	1.2965	10	1.4755	5	15	<b>50</b>
Community Space	Other support services (459)	26	1.3164	8	1.2412	2	10	<b>36</b>
Hotel	Hotel and Motel (479)	50	1.2417	12	1.2785	3	15	<b>65</b>
	<b>Total</b>	<b>739</b>		<b>301</b>		<b>139</b>	<b>440</b>	<b>1,179</b>

## NOTES:

<sup>a</sup> IMPLAN 2016 dataset for Los Angeles County. *Employment Multipliers*.

<sup>b</sup> Excludes 254 existing LA Clippers employees relocating from elsewhere in the region to the Project Site.

<sup>c</sup> Event employment is estimated as net new full time employment equivalent, based on maximum event numbers and employees per event type from Table 2-3, assuming 4 hours per event (2 events = 1 work day), 250 work days per year. Actual number of workers on site for any given event may be more, and is described in Table 2-3.

SOURCES: ALH Urban & Regional Economics and Applied Economics, LLC, 2019. Personal communications with Jonathan Teofilo, March 21, 2019, March 22, 2019, and March 25, 2019; ESA, 2019.

Specifically, an increase in housing demand in the greater Los Angeles region could cause significant environmental effects as new residential development would require governmental services, such as schools, libraries, and parks. Indirect and induced employment and population growth could further contribute to the loss of open space because it could encourage conversion to urban uses for housing, commercial space, and infrastructure.

Nevertheless, the incremental increase in economic activity created by the indirect and induced employment associated with the Proposed Project or Project Variants would be a small part of the overall future growth in economic activity in the Los Angeles metropolitan region. Local governments throughout the region are planning for additional residential and employment-generating land uses, some of which could meet the demands created indirectly by the Proposed Project or Project Variants. Through their planning and entitlement actions, the future actions of those local agencies would be subject to environmental review under CEQA, and would be required to be consistent with regional and state plans and regulations. To the extent that future development that accommodates indirect and induced growth from the Proposed Project or Project Variants is undertaken in a manner consistent with the multitude of planning and regulatory documents referred to throughout the technical sections of Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, of this EIR, many of the potential adverse environmental consequences would be reduced in magnitude or avoided altogether.

Although the economic effect of indirect and induced employment can be predicted, because the adverse physical environmental impacts of these economic effects could occur at locations throughout the Los Angeles metropolitan region, the environmental consequences of this type of economic growth are too speculative to evaluate or predict. Pursuant to CEQA Guidelines section 15145, no further analysis of the environmental consequences of indirect or induced growth associated with the Proposed Project or Project Variants is proper under CEQA.

## 4.5 Urban Decay

Under CEQA, economic or social effects are not considered significant effects on the environment. Rather, these effects are considered as potential linkages or indirect connections between the Proposed Project and physical environmental effects. More specifically, the direction for treatment of economic and social effects is stated in CEQA Guidelines section 15131(a):

Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on physical changes.

Anticipated economic or social effects of a project may be used in the determination of the significance of physical changes caused by the project.<sup>3</sup> As required by CEQA, the focus of the

<sup>3</sup> CEQA Guidelines sections 15064(e), 15131(b).

analysis in this EIR is on the physical changes that would result from the approval and implementation of the Proposed Project. Consistent with the requirements of CEQA, this EIR includes consideration of potential adverse physical environmental effects that could be the result of socioeconomic and/or economic changes that could be triggered by the Proposed Project, and as appropriate considers social and economic factors that may affect the significance of a physical effect. Section 3.12, Population, Employment, and Housing, Impacts 3.12-2 and 3.12-4 considers socio-economic effects related to the potential of the Proposed Project to result in displacement of housing or residents. The discussion below focuses on the socio-economic issue of urban decay.

As used in CEQA, the term “urban decay” was introduced by the Court of Appeal in the case entitled *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184 (*Bakersfield Citizens*). In that decision, the court required the City of Bakersfield to revise and recirculate two EIRs for two proposed Wal-Mart stores because the documents both failed to address the possible indirect physical effects flowing from the direct economic effects of the two projects. Though the court did not expressly define “urban decay,” the court seemed to equate the concept with a “chain reaction of store closures and long-term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake.”<sup>4</sup>

For the purposes of this assessment and consistent with the above described court decision, “urban decay” is not simply a condition in which buildings become vacant as businesses compete with each other in the normal course of the market-based economy, nor is it a condition where a building may be vacated by one business or use and reused by a different business or for alternative purposes. Rather, under CEQA and for the purposes of analysis in this EIR, “urban decay” is defined as physical deterioration of properties or structures that is so prevalent, substantial, and lasting a significant period of time that it impairs the proper utilization of the properties and structures, and the health, safety, and welfare of the surrounding community. Physical deterioration includes abnormally high business vacancies, abandoned buildings, boarded doors and windows, and long-term unauthorized use of the properties and parking lots, extensive or offensive graffiti painted on buildings, dumping of refuse or overturned dumpsters on properties, dead trees and shrubbery, and uncontrolled weed growth.

Prolonged business vacancies which could result in urban decay generally result from a lack of sufficient demand for commercial goods or services within a market area. Under these conditions, there isn't sufficient demand for the provision of goods or services to support the existing inventory of developed commercial space within a market area. Within any market area a small percentage of commercial vacancy is common and is considered a natural part of the market economy. In most market areas, the vacant or partially occupied commercial spaces are regularly maintained, as vacancies are assumed to be temporary and building owners have an economic incentive to maintain their property in order to make it more attractive for future tenants. Urban decay conditions can potentially occur in market areas where a large, persistent deficit in the demand for commercial services exists, relative to the available inventory of commercial space.

---

<sup>4</sup> *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184. p. 1204.

## Effects of Retail and Restaurant Uses

This analysis addresses the potential for the 48,000 sf of restaurant and retail uses that are included in the Proposed Project to create increased competition with other retail and restaurant uses in the local market, resulting in the physical urban decay of those retail and restaurant buildings.

The existing restaurant and retail uses within a market area constitute *supply*, which is the necessary volume of goods and services that must be sold for those businesses to meet operating costs. The demand for goods and services by retail and restaurant consumers within a market area constitute their *spending potential*. If the supply of space within the market area exceeds the spending potential for goods and services, commercial establishments become strained. Under those conditions, consumers in a market area do not have enough demand for goods and services to meet the supply of the businesses within that market area. It is reasonably anticipated that existing businesses can absorb a small percentage excess supply. However, periods of severe and/or prolonged excess supply result in business closures within an effected market area and ensuing commercial space vacancies. Under most conditions, business closures result in temporary vacancies that are eventually filled by similar new or alternative uses. Under more severe and prolonged conditions of excess supply, where the demand for commercial space is well below the available inventory, prolonged vacancies, property repossessions and declining maintenance of those properties can occur, resulting in urban decay.

Analysis of the potential for a project to cause or contribute to urban decay evaluates the project's impact on the existing market area to determine if the additional supply introduced by the commercial land uses in a proposed project would increase the total market area supply, to the extent that it would result in the types of conditions under which urban decay could be anticipated to occur or already is occurring. For this reason, analysis of urban decay takes into consideration conditions in the existing market area, the characteristics of the market area, and the impacts of the Proposed Project.

### **Existing Market Area**

The conditions under which the Proposed Project would be constructed are much different than conditions that were relevant to the *Bakersfield Citizens* case. The Project Site is set within the urbanized greater Los Angeles area, which encompasses five counties in southern California, extending from Ventura County in the west to San Bernardino County and Riverside County in the east. Within this environment, market areas for various types of retail vary by product or service type, each of which is subject to the furthest anticipated distance that consumers are willing to travel for those particular goods or services, while such goods or services are commonly available beyond those distances. Under these conditions numerous markets for particular goods or services can exist within the region. Consumers are typically less willing to travel large distances to obtain goods or services from neighborhood-serving retail establishments, such as grocery stores, but typically have a greater willingness to travel for specialty goods or services. For these reasons the distribution of specific types of retailers is commensurate to the size of the market area for the goods or services they provide. Smaller market areas will only allow a certain number of businesses providing

particular goods or services before exceeding the retail spending potential for that market area. Specialty goods or services have larger market areas and greater flexibility to respond to changes in the market, including the introduction of new retail supply. The larger market area provides flexibility and a decreased likelihood that individual retail projects would have a substantial impact on the overall market area.

### ***Project Impact***

The Project Site is located along the West Century Boulevard and South Prairie Avenue corridors, which are lined with Commercial, Major-Mixed-Use, Commercial/Residential, and Industrial general plan land uses.<sup>5</sup> As described in Section 3.10, Land Use and Planning, commercial development along these corridors includes big- and small-box retail, fast food, restaurants, fitness, entertainment and service uses. Community-serving retail and restaurant space in the vicinity of the Project Site do not exhibit high rates of vacancy. Commercial buildings in the vicinity of the Proposed Project are generally maintained and vacant commercial spaces do not reveal prolonged vacancy and stalled maintenance. With consideration of these characteristics, the area surrounding the Project Site does not appear to exhibit signs of urban decay. With the added context of development occurring pursuant to the Hollywood Park Specific Plan (HPSP), north of the Project Site, the area surrounding the Project Site is evolving to become a destination for large sporting and entertainment events, as well as regional-serving retail uses. The City anticipates that local businesses will benefit from consumer spending related to the HPSP, and ongoing operations at The Forum. For these reasons, the City anticipates that demand in the area surrounding the Project Site for commercial goods and services, and in turn for commercial space, would increase, which would lessen the potential for prolonged commercial space vacancies to occur.

The parcels included in the Project Site are currently undeveloped or developed with less intensive uses, relative to the uses the Proposed Project would introduce to the area. The Proposed Project would include the 18,000-seat arena, along with 48,000 sf of retail and restaurant space, 25,000 sf of sports medicine use, 85,000 sf of practice facility and team administrative offices, and 15,000 sf of community or related uses. The proposed commercial uses would be anticipated to be partially related to the Proposed Project arena and its main tenant, the LA Clippers, and would include an LA Clippers team store along with other retail and food and drink establishments, including a full-service restaurant/bar, coffee shop, and quick service restaurant. While some proposed retail uses would be community-serving (such as a coffee shop or restaurant), other retail would be regional serving (such as an LA Clippers Team Store). This latter type of retail would not be reasonably anticipated to create competitive pressure for nearby community-serving retail uses. Proposed retail uses would occupy approximately 24,000 square feet of the proposed commercial space, and proposed food and drink uses would occupy approximately 24,000 square feet of the development, comprising approximately 48,000 square feet of proposed commercial space, including a 7,000 sf LA Clippers Team Store. As described

---

<sup>5</sup> City of Inglewood, 2017. *City of Inglewood General Plan, Land Use Map*. Revised January 2017. Available: <https://www.cityofinglewood.org/DocumentCenter/View/11512/General-Plan-Land-Use-Map->. Accessed March 15, 2019.

above, proposed retail uses would be complementary to the Proposed Project arena, likely providing specialty goods and services considered to be attractive to event attendees.

Under the market area conditions described above, addition of the proposed restaurant and retail space included in the Proposed Project would not be anticipated to have a substantial impact on sales demand in the area surrounding the Project Site. The amount of the restaurant and retail space in the Proposed Project would be very small in comparison to existing commercial development along the West Century Boulevard and South Prairie Avenue corridors. For example, the Costco and Target shopping centers to the east of Yukon Avenue include retail and restaurant space many times the size of that included in the Proposed Project. Further, the retail and restaurant uses in the Proposed Project would be less than one tenth of the size of the over 500,000 sf of such uses that will be constructed as part of the HPSP Adjusted Baseline projects. The 48,000 sf of retail and restaurant uses located in the Proposed Project would have minimal, if any, effect on the overall supply of commercial space in the vicinity or the larger Los Angeles market area.

Further, with more than 1 million annual attendees at events at the Proposed Project arena, spending potential in the local commercial market area would increase. Much of that spending already occurs in the larger Los Angeles market area, but to the extent that some of the spending of these attendees would be shifted to the Inglewood area, arena attendance would support the retail and restaurant uses in the Proposed Project as well as other Inglewood area businesses.

## Effects of Arena Operations

Introduction of a new basketball and entertainment center to the greater Los Angeles area would create increased competition for arena events among the existing venues of similar size within the market. To better understand the potential for market-related shifts of events from existing venues to the Proposed Project, the City commissioned a study by Stone Planning LLC (Stone Report), included as Appendix R, Analysis of Future Events, to evaluate the effects of introduction of the Proposed Project arena on the Los Angeles area market for arena events.<sup>6</sup>

The study described the overall trends in the live entertainment industry, the current and future arena environment in the Los Angeles area, historic usage for other arenas in the market, and estimated the percentage of major third-party events projected to occur at the Proposed Project arena that would either be new to the market, or that would relocate to the Proposed Project arena from other venues in the market. The study focused on the market for third-party events including concerts, family shows, and other types of sporting and entertainment events; the study did not address local civic or corporate events all of which are reasonably anticipated to be occurring at specific locations in the region today pursuant to existing agreements. The focus on third-party events evaluated anticipated market conditions to project the number of arena events that would be held in the Los Angeles Market during the periods leading up to opening-year operations at the Proposed Project arena through stabilization of the arena market, following the commencement of operations at the Proposed Project arena. The study evaluated the number of events anticipated to

<sup>6</sup> Stone Planning, 2019. Inglewood Basketball and Entertainment Center – Analysis of Future Events. July 2019.

exist in the market prior to the first partial year and second full year of Proposed Project arena operations, projecting the number of those events that would be captured by the Proposed Project arena when it becomes operational, attracting those events away from existing venues. In addition, the study projects the share of new events to the market that would be captured by the Proposed Project arena, during those same study years.

The study identified The Forum and the Staples Center as venues that share the Los Angeles market and which would be anticipated to directly compete with the Proposed Project to attract third-party arena events.<sup>7</sup> The Forum (which reopened in 2014 after a major renovation) and Staples Center are the two major arenas that currently exist in the market area.<sup>8,9</sup> The study included analysis of the historical data, review of overall industry trends, and interviews with industry stakeholders, and concluded that with the introduction of the Proposed Project there would be overall growth in the number of events in the Los Angeles market.<sup>10</sup>

Given factors that include the Proposed Project being the third major arena added to the market, the addition of the new NFL Stadium with a 6,000-seat performance venue at the HPSP area, and the create of more available dates at Staples Center that would make it competitive for more third-party events than has been possible in the past (due to the relocation of the LA Clippers), the study concludes that the size of the market would continue to increase, but that the rate of growth in the market would be smaller than what occurred when The Forum reopened in 2014.<sup>11</sup> Further, the study notes that it could take about two years for the market to adjust prior to stabilization, as was observed with the reopening of The Forum.

The study concludes that upon market stabilization, approximately 20% of the concerts and family shows, and about 60% of Other Events at the Proposed Project arena would be new-to-market. Remaining concerts, family shows, and other events are already occurring in the Los Angeles market and would be shifted from other venues currently in the market. Thus, the environmental consequences of those events are already largely occurring in the region and the effects of the Proposed Project involve the relocation of such events to the Proposed Project. **Table 4-2** presents the number of new events anticipated for each sector.

---

<sup>7</sup> Stone Planning, 2019. Inglewood Basketball and Entertainment Center – Analysis of Future Events. July 2019. p. 15.

<sup>8</sup> Stone Planning, 2019. Inglewood Basketball and Entertainment Center – Analysis of Future Events. July 2019. pp. 11 and 12.

<sup>9</sup> In looking at past market conditions, the study also considers the L.A. Sports Arena, which was closed and demolished in 2016, to make way for construction of the Banc of California Stadium. Prior to its demolition, the L.A. Sports Arena hosted a small number of arena events, on an annual basis, that were equivalent in size to those likely to occur at the Proposed Project.<sup>9</sup> Thus for years prior to 2016, events that took place at the L.A. Sports Arena were also included in the analysis of previous arena events in the Los Angeles market.

<sup>10</sup> Stone Planning, 2019. Inglewood Basketball and Entertainment Center – Analysis of Future Events. July 2019. p. 20.

<sup>11</sup> Stone Planning, 2019. Inglewood Basketball and Entertainment Center – Analysis of Future Events. July 2019. p. 29.

**TABLE 4-2  
PROPOSED PROJECT NEW-TO-MARKET EVENTS BY TYPE**

<b>Event Type</b>	<b>Anticipated Number of Annual Events</b>	<b>New to Market % of Events</b>	<b>New to Market # of Events</b>
Concerts	23	20%	5
Family Shows	20	20%	4
Other Events	35	59%	21
<b>Total</b>	<b>78</b>	<b>38%</b>	<b>29</b>

SOURCE: Stone Planning, 2019. Inglewood Basketball and Entertainment Center – Analysis of Future Events. July 2019.

This analysis of urban decay focuses on the potential for addition of the Proposed Project to result in competitive pressure on other current venues, such that any other venue would be unable to capture sufficient events to remain viable, and would be forced to permanently close, leading to potential urban decay effects. Because the Staples Center would retain three of its existing major league sports team tenants (i.e., the NBA Los Angeles Lakers, NHL Los Angeles Kings, and WNBA Los Angeles Sparks), it is less available for or reliant on third-party events. The Forum, as a specialty concert venue that has increased its capture of concerts and other third-party events each year since it has been open, would be anticipated to continue to capture such events. While there could be some decrease in events at other venues during the initial years after opening of the Proposed Project, the evidence does not suggest that the Proposed Project would affect the viability of competing arenas in the arena market. Therefore, the City does not anticipate that addition of the Proposed Project to the Los Angeles area market would result in conditions that would contribute to or cause urban decay of other major sports and entertainment venues in the region.

## Conclusion

As described above, the addition of commercial space included in the Proposed Project is very small in comparison to the existing and Adjusted Baseline commercial development. The combination of a relatively small amount of commercial development in the Proposed Project and a large number of event attendees who would be attracted to the project vicinity suggest that it is very unlikely that the Proposed Project would have a negative impact on market area retailers that would result in the prolonged closure of market-area businesses. Any closures and ensuing commercial vacancies that may result from competitive market pressures would be anticipated to be temporary and would be backfilled by other retail or restaurant uses, or by other commercial uses that would be compatible with available space. Further, these uses would be supported by the spending of event attendees who travel to the Inglewood area as a result of the Proposed Project.

The discussion above describes the potential for changes in the market for arena events as a result of the addition of the Proposed Project arena to a market that is currently exclusively shared between The Forum and Staples Center. As described above, when the Proposed Project commences operation, it will be anticipated to capture a portion of existing arena events occurring at the other two arenas in the market, as well as a portion of the new events that would

result from anticipated annual growth and additional growth in arena events available to the arena market as a result of the increased capacity within the market for arena events. The projected relocation of events from existing venues to the Proposed Project does not appear to be of sufficient magnitude to affect the viability of the existing arenas in the arena market.

For the reasons described above, the City does not anticipate that the Proposed Project would result in conditions that would contribute to or cause urban decay of retail commercial space or sports and entertainment arena venues in the local market. This impact would be **less than significant**.