



COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
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ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

GAIL FARBER, Director

December 03, 2013

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

20 January 14, 2014

Sachi A. Hamai
SACHI A. HAMAI
EXECUTIVE OFFICER

**APPROVE JOINT COMMUNITY FACILITIES AGREEMENT
FOR CITY OF INGLEWOOD COMMUNITY FACILITIES DISTRICT NO. 2010-1
CITY OF INGLEWOOD; HOLLYWOOD PARK LAND COMPANY, LLC; AND
LOS ANGELES COUNTY FLOOD CONTROL DISTRICT
(SUPERVISORIAL DISTRICT 2)
(3 VOTES)**

SUBJECT

This action is to approve the Joint Community Facilities Agreement (JCFA) between the City of Inglewood; Hollywood Park Land Company, LLC; and the Los Angeles County Flood Control District (LACFCD) to allow certain public facilities to be financed by the City of Inglewood Community Facilities District No. 2010-1 and ultimately transferred to, owned, and operated by the LACFCD.

IT IS RECOMMENDED THAT THE BOARD ACTING AS THE GOVERNING BODY OF THE COUNTY OF LOS ANGELES AND THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT:

1. Acting as a responsible agency for the Hollywood Park Redevelopment Project, consider the Final Environmental Impact Report prepared and certified by the City of Inglewood as lead agency for the project, together with any comments received during the public review period; adopt the mitigation monitoring program finding the mitigation monitoring reporting program is adequately designed to ensure compliance with the mitigation measures during project implementation; find that there are no further feasible alternatives or feasible mitigation measures within the Board's power that would substantially lessen or avoid any significant effect the project would have on the environment; and determine that the significant adverse effects of the project either have been reduced to an acceptable level or are outweighed by the specific consideration of the project as outlined in the Findings of Fact and Statement of Overriding Considerations, which findings and statement are adopted and incorporated herein by reference.

2. Acting as the governing body of the Los Angeles County Flood Control District, approve and instruct the Chairman to sign the Joint Community Facilities Agreement between the City of Inglewood; Hollywood Park Land Company, LLC; and the Los Angeles County Flood Control District.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The purpose of the recommended actions is to adopt the required mitigation monitoring reporting program and the Environmental Findings of Fact and Statement of Overriding Considerations and allow the Department of Public Works to enter into the enclosed JCFA between the City, Hollywood Park, and LACFCD. This will allow Community Facilities District No. 2010-1, formed by the City, to provide financing for drainage facilities proposed by Hollywood Park for the Hollywood Park Redevelopment Project and for said facilities to ultimately be transferred to and owned by LACFCD.

Implementation of Strategic Plan Goals

The Countywide Strategic Plan directs the provisions of Operational Effectiveness (Goal 1) and Integrated Services Delivery (Goal 3). The recommended actions will help meet these goals by providing maintenance to certain public facilities that will have a positive impact on the quality of life and will benefit the community.

FISCAL IMPACT/FINANCING

There will be no impact to the County General Fund.

The JCFA does not include any financial obligation for the County. The agreement contemplates the construction of drainage facilities financed by the City's Community Facilities District No. 2010-1. If they meet LACFCD's standards, these facilities will be transferred to LACFCD and added to its inventory, and the maintenance and operation of these facilities will be performed as part of a routine function of Public Works using appropriate funds.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The enclosed agreement has been reviewed and approved by County Counsel.

The Hollywood Park Redevelopment Project is located in the City and will be a 238-acre mixed-use development that will be built on the site of the Hollywood Park racetrack and includes construction of dwelling units, retail office spaces, and recreational uses.

The Mello-Roos Community Facilities Act of 1982 requires an agreement between any jurisdiction creating a Mello-Roos Community Facilities District and any other jurisdiction that will own or operate the improvements financed through the Community Facilities District. Approval of this agreement will enable the City to finance drainage facilities through Mello-Roos financing that would be owned and operated by LACFCD.

LACFCD will have the authority to inspect construction of the improvements and require compliance with other conditions before the facilities are accepted for LACFCD operation.

ENVIRONMENTAL DOCUMENTATION

In approving and entering into the proposed agreement, the LACFCD is acting as a responsible agency for the proposed project. As lead agency, the City has prepared an Initial Study, consulted with Public Works, and certified the enclosed Final Environmental Impact Report for this project on June 3, 2009. The significant adverse effects of the project either have been reduced to an acceptable level or are outweighed by the specific consideration of the project.

Upon the Board's approval of the project, Public Works will file a Notice of Determination with the Registrar-Recorder/County Clerk in accordance with Section 21152(a) of the California Public Resources Code.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The processing of such JCFAs and maintenance of flood control facilities are under the purview of the LACFCD as routine functions of Public Works.

CONCLUSION

Please return one adopted copy of this letter and two originals of the cooperative agreement, including one stamped City original, to the Department of Public Works, Programs Development Division.

Respectfully submitted,



GAIL FARBER

Director

IK:JTW:yr

Enclosures

c: Chief Executive Office (Rita Robinson)
County Counsel
Executive Office

13-065

JOINT COMMUNITY FACILITIES AGREEMENT FOR
CITY OF INGLEWOOD COMMUNITY FACILITIES DISTRICT NO. 2010-1
(HOLLYWOOD PARK)

BY AND AMONG

LOS ANGELES COUNTY FLOOD CONTROL DISTRICT

AND

CITY OF INGLEWOOD

AND

HOLLYWOOD PARK LAND COMPANY, LLC

dated as of January 14th, 2014

78106

**JOINT COMMUNITY FACILITIES AGREEMENT FOR
CITY OF INGLEWOOD COMMUNITY FACILITIES DISTRICT NO. 2010-1
(HOLLYWOOD PARK)**

THIS JOINT COMMUNITY FACILITIES AGREEMENT FOR CITY OF INGLEWOOD COMMUNITY FACILITIES DISTRICT NO. 2010-1 (HOLLYWOOD PARK), dated as of May 15, 2013, is by and among the LOS ANGELES COUNTY FLOOD CONTROL DISTRICT, a body corporate and politic (the "LACFCD"), the CITY OF INGLEWOOD, a city organized and existing under the laws of the State of California and its charter (the "City"), and HOLLYWOOD PARK LAND COMPANY, LLC, a limited liability company duly organized and existing under the laws of the State of Delaware ("Hollywood Park").

W I T N E S S E T H:

WHEREAS, pursuant to the Mello-Roos Community Facilities Act of 1982, as amended, consisting of Sections 53311 et seq. of the California Government Code (the "Act"), the City has formed City of Inglewood Community Facilities District No. 2010-1 (Hollywood Park) (the "District") to finance certain public capital facilities to be provided in conjunction with the Hollywood Park Project, including facilities to be owned or operated by the LACFCD; and

WHEREAS, subsection (a) of Section 53316.2 of the Act provides that a community facilities district may finance facilities to be owned or operated by an entity other than the agency that created the community facilities district only pursuant to a joint community facilities agreement or a joint exercise of powers agreement adopted pursuant to said section; and

WHEREAS, subsection (b) of Section 53316.2 of the Act provides that at any time prior to the adoption of the resolution of formation creating a community facilities district or a resolution of change to alter a district or a resolution or resolutions authorizing the issuance of bonds pursuant to Section 53356 of the Act, the legislative bodies of two or more local agencies may enter into a joint communities facilities agreement pursuant to said section and Sections 53316.4 and 53316.6 of the Act or into a joint exercise of powers agreement pursuant to the Joint Exercise of Powers Act (Chapter 5 (commencing with Section 6500) of Division 7 of Title 1) to exercise any power authorized by the Act with respect to the community facilities district if the legislative body of each entity adopts a resolution declaring that the joint agreement would be beneficial to the residents of that entity; and

WHEREAS, the legislative body of the District has not yet adopted a resolution authorizing the issuance of bonds pursuant to the Act; and

WHEREAS, the LACFCD is authorized by Section 13-3/4 of the Los Angeles County Flood Control Act to accept transfers and conveyances from public entities of storm drain improvements and drainage systems for operation, maintenance, repair, and improvement thereof, if those improvements or systems benefit property within the LACFCD; and

WHEREAS, the LACFCD, the City and Hollywood Park desire, prior to the adoption of a resolution authorizing the issuance of bonds pursuant to the Act, to enter into this Agreement so as to provide for the financing by the District of certain drainage facilities that may ultimately be transferred to, owned and/or operated by, the LACFCD;

NOW, THEREFORE, in consideration of the above promises and of the mutual promises herein contained, the LACFCD, the City and Hollywood Park do hereby agree as follows:

SECTION 1. PURPOSE.

This Agreement is made pursuant to Sections 53316.2, 53316.4 and 53316.6 of the Act for the purpose of providing for the financing by the District of the acquisition, purchase, modification, expansion, improvement, rehabilitation, lease or construction of the facilities which may ultimately be transferred to, owned and/or operated by the LACFCD described in Exhibit A hereto and by this reference incorporated herein (such list, as amended, modified or supplemented from time to time by agreement between the parties, the "Facilities").

SECTION 2. THE DISTRICT.

(a) The City has established the District under the terms of the Act.

(b) It is the current intention of the City that the District will from time to time in its sole discretion under the Act issue bonds to finance the cost of certain of the Facilities and all incidental expenses authorized by the Act and to levy annually, within the District, special taxes sufficient to pay the principal and interest and other periodic costs on such bonds. This Agreement provides for the allocation and distribution of the proceeds of any special tax levy as follows: If bonds are issued pursuant to the Act to finance any of the Facilities, either (i) a separate sub-account will be established pursuant to the indentures or trust agreements (including supplemental indentures or trust agreements) for such bond issuances which will hold the bond proceeds budgeted at the time of such bond issuances for such Facilities and which proceeds may be released by the trustee under such indentures or trust agreements only for costs related to such Facilities on the earlier of completion of such Facilities to the reasonable satisfaction of the City or the prior written approval of the City for each such release, or (ii) in the absence of such a sub-account, the City must consent in writing to each payment of bond proceeds for costs related to any of the Facilities. The City shall have sole discretion to choose between the options set forth in clauses (i) and(ii) above. If bonds are issued pursuant to the Act to finance any of the Facilities, but the bond proceeds are inadequate to completely finance such Facilities, such shortfall(s) shall be and remain the responsibility and liability of Hollywood Park and shall not lie with the District, the City or the LACFCD. If bonds are not issued to finance any of the Facilities, neither the District, the LACFCD nor the City shall have any obligation to provide amounts to pay any costs of the Facilities. The responsibility and liability relative to funding such Facilities shall be and remain the responsibility of Hollywood Park. Notwithstanding anything to the contrary contained herein (including, without limitation, the last four sentences of this Subsection 2(b)), Hollywood Park shall only be responsible for funding such Facilities to the extent that Hollywood Park is otherwise obligated to construct such Facilities from its own funds pursuant to existing conditions of approval or written agreements entered into by Hollywood Park.

(c) Residents and property owners of the LACFCD will not be subject to the levy of the special taxes unless they own real property located within the District and will not be in any way responsible for any costs arising out of or related to the District or this Agreement.

SECTION 3. BENEFITS.

The LACFCD and the City have each determined that this Agreement would be beneficial to their respective residents (and have so declared by resolution of their respective legislative bodies).

SECTION 4. FACILITIES.

(a) Prior to the construction of any of the Facilities, described in Exhibit A, Hollywood Park shall submit plans and specifications to the City and shall obtain the City's approval of said plans and specifications. The City intends to transfer the Facilities to the LACFCD, and accordingly, the City shall require Hollywood Park to submit plans and specifications to the LACFCD and obtain LACFCD's approval for such plans and specifications, and to construct the Facilities in strict conformance with such plans and specifications and in full compliance with the LACFCD's current standards, policies, and guidelines for the acceptance of storm drain improvements and drainage systems (hereafter "LACFCD Criteria") and in full compliance with all applicable laws, including, without limitation, public bidding and prevailing wage requirements to the extent applicable. The construction activities for the Facilities shall be subject at all reasonable times to inspection and approval by the City and LACFCD.

(b) When and if the construction of the Facilities is completed to the reasonable satisfaction of the City and LACFCD, the City will take ownership of the Facilities and take whatever actions are necessary so that Hollywood Park can be paid for the Facilities if and when bond proceeds and/or special taxes are available for such purposes. Hollywood Park shall be solely responsible for the plans, specifications and design (subject to City and LACFCD approval), construction, supervision of construction, installation, furnishing, equipping, and warranties, if applicable, of the Facilities. Prior to the acceptance of the Facilities by the City, Hollywood Park shall be solely responsible for the financing, operation and maintenance of the Facilities, subject to City oversight. From and after the acceptance thereof by the City, the City shall be solely responsible for the operation and maintenance of the Facilities until such time that the City transfers, and the LACFCD accepts, the Facilities.

(c) After the City takes ownership of the Facilities, the City shall request the LACFCD to accept the transfer the Facilities from the City to the LACFCD, for ownership and maintenance. LACFCD shall accept the Facilities upon satisfaction of the following conditions:

- (i) Approval of the plans and specifications for the Facilities by the LACFCD.
- (ii) Field approval of the construction of the Facilities by the LACFCD.

(iii) City shall provide a deed to the LACFCD, duly executed by the City, conveying to LACFCD an easement in, over, under, and across all private property necessary for the operation, maintenance, repair, and improvement of the Facilities .

(iv) City shall provide to the LACFCD an accurate and complete Phase 1 Environmental Site Assessment for the Facilities and the property on which the Facilities are located, in accordance with the most updated version of ASTM E1527 Standard Practice for Environmental Site Assessment: Phase 1 Environmental Site Assessment Process as published by the American Society for Testing and Materials, as said Standard Practice may be updated from time to time. The completion of any and all subsurface exploratory work, testing and remediation relating to any environmental contamination affecting the Facilities or the property on which it is located, shall be a condition precedent to the acceptance of the Facilities by the LACFCD.

(v) The City must represent, warrant, and guarantee, in a writing to the LACFCD, that:

(A) The City has good and sufficient title to or an interest in the property on which the Facilities are located, for the operation, maintenance, repair, and improvement thereof, that the City has the right to convey the easement described in section 4(c)(iii), above, and that the easement conveyed by City to the LACFCD is free of all prior liens and encumbrances, unless expressly agreed to in writing by the LACFCD's Chief Engineer.

(B) The Facilities are located entirely on and within dedicated public streets or the private property described in the respective deed referred to in section 4(c)(iii) above, and that no portion of the Facilities are located outside the boundaries of said dedicated public streets or private property.

(d) Nothing contained herein shall obligate the LACFCD to expend any LACFCD funds to finance the Facilities.

(e) Indemnification and Warranty by the City. The City shall assume the defense of, indemnify and save harmless, LACFCD, its officers, employees and agents, and each and every one of them, from and against all actions, damages, claims, losses or expenses of every type and description to which they may be subjected or put, by reason of, or resulting from, the breach of any of the representations, warranties or guarantees contained in the writing described in Section 4(c)(v), above . City shall also guarantee and warranty the Facilities against any defective work or labor done or defective materials furnished for a period of one year following LACFCD's acceptance of the Facilities.

(f) Indemnification by Hollywood Park. Hollywood Park shall assume the defense of , indemnify and save harmless, the City, the CFD and LACFCD, their respective officers, employees and agents, and each and every one of them, from and against all actions, damages, claims, losses, or expenses of every type and description to which they may be subjected or put, by reason of, or resulting from, any act or omission of Hollywood Park, its officers, employees and agents, and each and every one of them, with respect to this Agreement, and the design, engineering and construction of the Facilities constructed by Hollywood Park; provided, however, that Hollywood Park shall not be require to indemnify

any person or entity to the extent of any damages resulting from negligence or willful misconduct of such person or entity or their officers, agents or employees.

(g) The City acknowledges and agrees that the LACFCD's acceptance of the Facilities shall in no way be interpreted or inferred as a release by the LACFCD of the City's responsibilities for compliance with stormwater regulations of the transferred facilities. The City will take the full responsibilities for all claims, losses, expenses, suits actions, decrees, judgments, awards, attorneys' fees, and court costs in relation to or arising from any legal action by the regulators against the LACFCD, including, without limitation, relating to noncompliance with stormwater regulations of the Facilities if they are conveyed by the City to the District pursuant to this Agreement.

(h) Notwithstanding anything herein to the contrary, if tax-exempt bonds are issued to finance any portion of the cost of the Facilities, the LACFCD shall not permit the Facilities to be used in the trade or business of a non- governmental person, absent an opinion of bond counsel stating that such use together with any other use of any other property financed with the proceeds of such bonds will not adversely effect that tax status of such bonds. Moreover, if bonds are issued pursuant to the Act to finance any Facilities, the LACFCD agrees in connection therewith to provide such certifications and make such representations and covenants as are determined by bond counsel to be necessary or appropriate in order (a) for bond counsel to conclude that interest on such bonds is excludable from gross income for federal income tax purposes, or (b) to assure compliance with the requirements of the Act.

(i) The City acknowledges and agrees that the LACFCD's acceptance, inspection, review, and/or approval of the Facilities or property or any related plan or specification, or the application of LACFCD's criteria shall in no way be interpreted or inferred as a release by LACFCD of the City's obligations or a waiver of the LACFD's rights, indemnities, releases, warranties, or remedies under this Agreement, in law or in equity, including, without limitation, relating to the design, construction, operation, or maintenance of the Facilities or property conveyed by the City to the LACFCD pursuant this Agreement.

(j) Upon a request from the City, the LACFCD may, in its sole discretion, agree to operate and maintain, on the City's behalf, any BMP Devices/Systems . In the event the LACFCD agrees to operate and maintain any BMP Devices/Systems , the City and the District shall enter into a separate agreement therefore, which shall include provisions for the City to provide sufficient funds to the LACFCD to operate, maintain, and replace the BMP Devices/Systems .

(k) If the Facilities, or any portion thereof, must be relocated or modified as a result of the relocation, change of grade, or other modification of any street or other property owned or under the control of the City, City shall be responsible for any and all costs or expenses related to such relocation or modification, in accordance with the following:

(i) City shall, prior to commencing any work on the Facilities, apply for and obtain a permit from the LACFCD for the relocation or modification of the Facilities or portion thereof;

(ii) City shall be responsible for performing the relocation or modification, including the payment of all environmental documentation and permitting, design and construction costs related to the relocation or modification;

(iii) After completion of the relocation or modification of the Facilities or portion thereof, City shall provide to LACFCD as-built plans accurately depicting the relocation or modification.

(l) The provisions of that certain Transfer Agreement, No. 40420, with the City of Inglewood executed on October 20, 1981 and recorded on December 30, 1981 as Instrument No. 81-1274779 of Official Records in the Office of the County Recorder of Los Angeles County, State of California, shall be inapplicable to the matters covered by this Agreement.

SECTION 5. COOPERATION.

The LACFCD, the City and Hollywood Park shall take all actions, do all things, and grant all approvals which may be reasonably necessary or desirable to effectuate the purposes of this Agreement. Such actions, things and approvals shall be taken, done or granted by the LACFCD, the City and Hollywood Park, as applicable, diligently and without unreasonable delay. Notwithstanding the foregoing or anything else contained in this Agreement, the LACFCD shall not be required to take any action that conflicts with any rules, regulations or policies of the LACFCD; and the City shall not be required to take any action that conflicts with any rules, regulations or policies of the City.

SECTION 6. TERMINATION.

The obligations of the parties under this Agreement, respectively, shall terminate upon a failure to comply with any material provision of this Agreement by any other party hereto, if such failure continues for more than thirty (30) days after notice thereof from a non-breaching party, unless (a) the cure for such failure cannot be accomplished within the thirty-day period, (b) a cure is commenced within the 30-day period, and (c) the cure is completed within ninety (90) days after the notice mentioned above.

SECTION 7. NOTICES.

Notices hereunder shall be in writing and shall be sufficient if delivered to:

County of Los Angeles
Department of Public Works
P.O. Box 1460
Alhambra, CA 91802-1460
Attention: Programs Development Division

City of Inglewood
One West Manchester Boulevard
Inglewood, California 90301
Attention: Finance Director
Attention: Public Works Director

Hollywood Park Land Company, LLC
c/o Wilson Meany Sullivan, L.P.
100 Wilshire Boulevard, Suite 940
Santa Monica, California 90401
Attention: Douglas Moreland, Exec. Vice President
Facsimile: (310) 382-9060
E-mail: dmoreland@wmspartners.com

with a copy to: Gibson, Dunn & Crutcher LLP
333 South Grand Avenue, Suite 4900
Los Angeles, California 90071
Attention: Amy R. Forbes, Esq.
Facsimile: (213) 229-6151
(213) 229-6128
E-mail: aforbes@gibsondunn.com

SECTION 8. AMENDMENTS.

This Agreement may be amended at any time, or from time to time, by one or more supplemental agreements executed by all of the parties to this Agreement either as required in order to carry out any of the provisions of this Agreement or for any other purpose.

SECTION 9. COUNTERPARTS.

This Agreement may be executed in multiple counterparts, all of which shall constitute one and the same instrument and each of which shall be, and shall be deemed to be an original.

SECTION 10. GOVERNING LAW.

This Agreement shall be interpreted and construed under the provisions of the laws of the State of California.

[Remainder of page left intentionally blank.]

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their proper officers thereunto duly authorized as of the date first set forth above.



LOS ANGELES COUNTY FLOOD CONTROL DISTRICT

By: *Alan Krabe*
Chairman, Board of Supervisors

ATTEST:

Executive Officer of the Board of supervisors of the County of Los Angeles

By: *[Signature]*
Deputy

APPROVED AS TO FORM: **JAN 14 2014**

County Counsel

By: *Julia Weisner*
Deputy

I hereby certify that pursuant to Section 25103 of the Government Code, delivery of this document has been made

SACHI A. HAMAI
Executive Officer
Clerk of the Board of Supervisors

By: *[Signature]*
Deputy **JAN 14 2014**



CITY OF INGLEWOOD

By: *[Signature]*
Mayor

ATTEST:

[Signature]
City Clerk

APPROVED AS TO FORM

Cae P. Saunders
City Attorney

[signatures continued on next page]

ADOPTED
BOARD OF SUPERVISORS

#20 JAN 14 2014

Sachi A. Hamai
SACHI A. HAMAI
EXECUTIVE OFFICER

HOLLYWOOD PARK LAND COMPANY,
LLC, a Delaware limited liability company


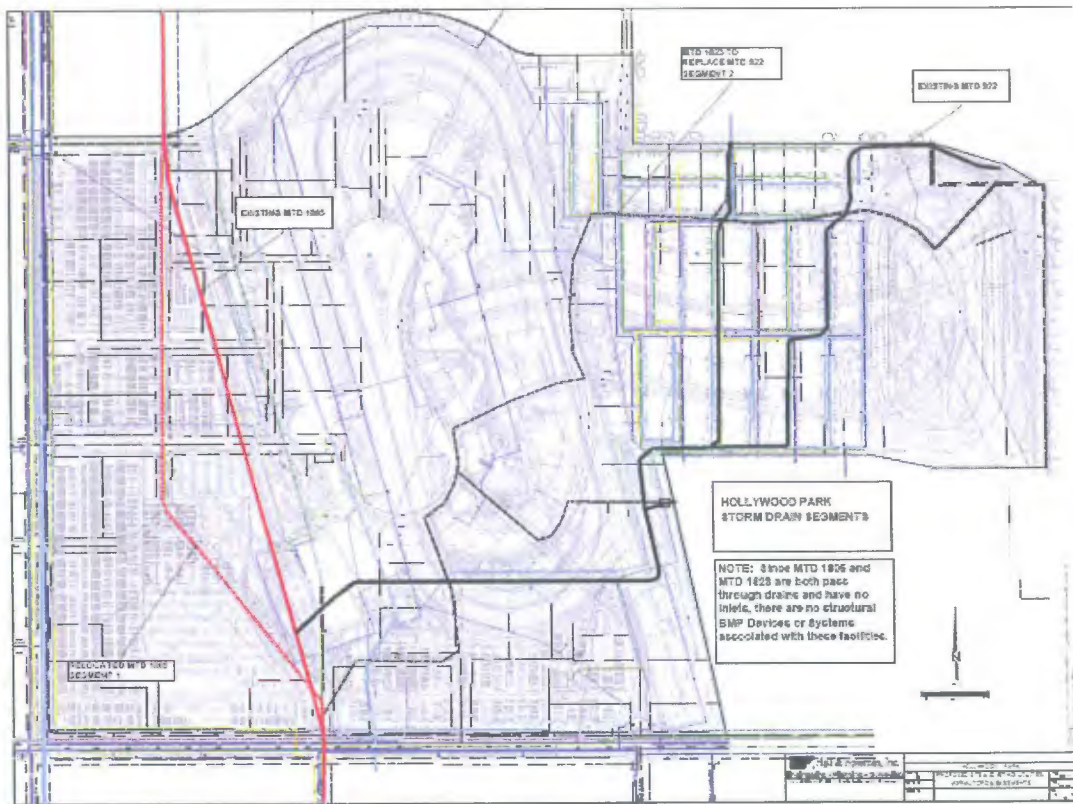
By:  _____
Christopher Meany
Senior Vice President

EXHIBIT A

FACILITIES

The Facilities are those improvements to be constructed by or on behalf of Hollywood Park that it is contemplated will be transferred to and owned, operated and maintained by the City of Inglewood, which it is contemplated will transfer them to the Los Angeles County Flood Control District for operation and maintenance, including, without limitation, trenching, pipelines, manholes, junction structures, transition structures, trench backfill, traffic control, pavement repair and all appurtenant facilities relating to the foregoing. This description of the Facilities is preliminary, general and subject to change. The final and specific description of the Facilities shall be based upon the final approved plans and shall include the facilities required by the City to be constructed in connection with development of the land within the City of Inglewood Community Facilities District No. 2010-1 (Hollywood Park).



FACILITIES

ESTIMATED ACQUISITION COSTS* AS OF NOVEMBER, 2010

Segment 1: MTD 1805	\$2,858,732
Segment 2: MTE 1823	\$2,517,287
<u>Total Facilities =</u>	<u>\$5,376,019</u>

See the following for details of segments and estimated costs.

*ACQUISITION COSTS: With respect to a Segment, the estimated cost of the Facilities that is eligible to be funded by the District.

**FACILITIES
STORM DRAIN SEGMENT 2**

Storm Drain Segment 2	Acquisition Cost *
Construct MTD 1823: 6,265' Storm Drain	\$ 1,593,733
Construction Contingency	\$ 318,747
Design/Engineering/Consultants	\$ 153,781
Plan Check & Inspection Fees	\$ 127,499
General Conditions and Contractors Fee	\$ 183,279
Construction Management 3.8%	\$ 60,562
Project Administration Fee 5%	\$ 79,687
	\$ 2,517,287



*Acquisition Cost: With respect to a Segment, the estimated cost of the Facilities that are eligible to be funded by the District.

RESOLUTION NO. 10-157

RESOLUTION APPROVING THE EXECUTION AND DELIVERY OF AN ACQUISITION AND FUNDING AGREEMENT AND SEPARATE JOINT COMMUNITY FACILITIES AGREEMENTS WITH THE WEST BASIN MUNICIPAL WATER DISTRICT, THE COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS AND THE COUNTY SANITATION DISTRICT NO. 5 OF LOS ANGELES COUNTY IN CONNECTION WITH CITY OF INGLEWOOD COMMUNITY FACILITIES DISTRICT NO. 2010-01 AND OTHER MATTERS RELATED THERETO

WHEREAS, the City Council (the "City Council") of the City of Inglewood (the "City") has conducted proceedings under the Mello-Roos Community Facilities Act of 1982 (the "Act") to establish the City of Inglewood Community Facilities District No. 2010-01 (the "Community Facilities District"), to designate portions of the Community Facilities District as five improvement areas (each an "Improvement Area") known as "City of Inglewood Community Facilities District No. 2010-01 Improvement Area No. 1 (Hollywood Park)" ("Improvement Area 1"), "City of Inglewood Community Facilities District No. 2010-01 Improvement Area No. 2 (Hollywood Park)" ("Improvement Area 2"), "City of Inglewood Community Facilities District No. 2010-01 Improvement Area No. 3 (Hollywood Park)" ("Improvement Area 3"), "City of Inglewood Community Facilities District No. 2010-01 Improvement Area No. 4 (Hollywood Park)" ("Improvement Area 4") and "City of Inglewood Community Facilities District No. 2010-01 Improvement Area No. 5 (Hollywood Park)" ("Improvement Area 5"), and to authorize the levy of special taxes within each Improvement Area to contribute to the financing of certain public facilities (the "Facilities") and services, and the authorization and issuance of bonds of the Community Facilities District and each Improvement Area therein to be repaid by the special taxes;

WHEREAS, Hollywood Park Land Company, LLC (the "Developer") has constructed and will construct certain of the Facilities to be owned and operated by the City proposed to be financed by the Community Facilities District pursuant to the Act, and the Community Facilities District and the respective Improvement Areas propose to purchase such Facilities relating to the Community Facilities District and/or one or more Improvement Areas therein from the Developer pursuant to an Acquisition and Funding Agreement by and among the Community Facilities District, the City and the Developer (such Acquisition Agreement, in the form presented to this meeting, with such changes, insertions and omissions as are made pursuant to this Resolution, being referred to herein as the "Acquisition Agreement");

WHEREAS, there have been prepared and submitted to this meeting a form of the Acquisition Agreement;

WHEREAS, the City Council desires to authorize the execution and delivery of the Acquisition Agreement and the performance of such acts by or on behalf of the Community Facilities District and the City, as applicable, as may be necessary or desirable to effect the

execution and delivery of the Acquisition Agreement;

WHEREAS, the City Council is considering including, among the Facilities to be authorized to be financed by the Community Facilities District, certain facilities (the "Water District Improvements") which are to become the property of the West Basin Municipal Water District ("West Basin MWD"), and relate to a land development project being undertaken by the Developer;

WHEREAS, the City Council is advised that in order for it to authorize the Community Facilities District and/or the Improvement Areas to finance the Water District Improvements to be owned, maintained and operated by West Basin MWD, it must enter into one or more joint community facilities agreements (collectively, the "West Basin Municipal Water District JCFA") with West Basin MWD and the Developer;

WHEREAS, the City Council has determined that the West Basin Municipal Water District JCFA and the resulting Water District Improvements to be financed pursuant thereto will be beneficial to the residents of the Community Facilities District and/or one or more Improvement Areas therein;

WHEREAS, the City Council is considering including, among the Facilities to be authorized to be financed by the Community Facilities District, certain facilities (the "Flood Control Improvements") which are to become the property of the County of Los Angeles Department of Public Works ("LA County Public Works"), and relate to a land development project being undertaken by the Developer;

WHEREAS, the City Council is advised that in order for it to authorize the Community Facilities District and/or the Improvement Areas to finance the Flood Control Improvements to be owned, maintained and operated by LA County Public Works, it must enter into one or more joint community facilities agreements (collectively, the "LA County Public Works JCFA") with LA County Public Works and the Developer;

WHEREAS, the City Council has determined that the LA County Public Works JCFA and the resulting Flood Control Improvements to be financed pursuant thereto will be beneficial to the residents of the Community Facilities District and/or one or more Improvement Areas therein;

WHEREAS, the City Council is considering including, among the Facilities to be authorized to be financed by the Community Facilities District, certain facilities (the "Sanitation District Improvements") which are to become the property of the County Sanitation District No. 5 of Los Angeles County ("Sanitation District No. 5"), and relate to a land development project being undertaken by the Developer;

WHEREAS, the City Council is advised that in order for it to authorize the Community Facilities District and/or the Improvement Areas to finance the Sanitation District Improvements to be owned, maintained and operated by Sanitation District No. 5, it must enter into one or more joint community facilities agreements (collectively, the "Sanitation District No. 5 JCFA" and, together with the West Basin Municipal Water District JCFA and the LA County Public Works

JCFA, the "JCFA") with Sanitation District No. 5 and the Developer;

WHEREAS, the City Council has determined that the Sanitation District No. 5 JCFA and the resulting Sanitation District Improvements to be financed pursuant thereto will be beneficial to the residents of the Community Facilities District and/or one or more Improvement Areas therein;

WHEREAS, there have been prepared and submitted to this meeting a form of each JCFA;

WHEREAS, Orrick, Herrington & Sutcliffe LLP has previously been approved and designated as Bond and Disclosure Counsel in connection with the proposed issuance of bonds of the Community Facilities District and each Improvement Area therein and the City Administrator and the Finance Director were authorized to enter into one or more agreements with Orrick, Herrington & Sutcliffe LLP in connection with the proposed issuance of Bonds; and

WHEREAS, the City Council is fully advised in this matter;

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Inglewood as follows:

Section 1. The Acquisition Agreement, in substantially the form submitted to this meeting and made a part hereof as though set forth in full herein, is hereby approved. The Mayor of the City of Inglewood, and any such officer designated or appointed in an acting or interim capacity and such other member of the City Council as the Mayor may designate, the City Administrator, the Assistant City Administrator, the Finance Director and any such other officer of the City as the City Administrator may designate (each an "Authorized Officer of the Community Facilities District") are, and each of them is, hereby authorized and directed, for and in the name of the Community Facilities District, to execute and deliver the Acquisition Agreement in the form presented to this meeting, with such changes, insertions and omissions as are approved by the City Administrator in consultation with the City Attorney and Bond Counsel, such approval and consultation to be conclusively evidenced by such execution and delivery. The City Clerk of the City is authorized to attest the execution of such agreement.

The Mayor of the City of Inglewood, and any such other member of the City Council as the Mayor may designate, the City Administrator, the Assistant City Administrator, the Finance Director and any such officer designated or appointed in an acting or interim capacity and such other officer of the City as the City Administrator may designate (each an "Authorized Officer of the City") are, and each of them is, hereby authorized and directed, for and in the name of the City, to execute and deliver the Acquisition Agreement in the form submitted to this meeting, with such changes, insertions and omissions as are approved by the City Administrator in consultation with the City Attorney and Bond Counsel, such approval and consultation to be conclusively evidenced by such execution and delivery. The City Clerk of the City is authorized to attest the execution of such agreement.

Section 2. The form of each JCFA, in substantially the forms submitted to this meeting and made a part hereof as though set forth in full herein, is hereby approved. The

Authorized Officers of the City and the Authorized Officers of the Community Facilities District are, and each of them is, hereby authorized and directed to execute and deliver each JCFA in substantially the form presented to this meeting, with such changes, insertions and omissions as are approved by the City Administrator in consultation with the City Attorney and Bond Counsel, such approval and consultation to be conclusively evidenced by such execution and delivery. The City Clerk of the City is authorized to attest the execution of such agreements.

Section 3. The Maximum Agreement Amount set forth in Article 4 of the City's Compensation Agreement with Orrick, Herrington & Sutcliffe LLP is increased by \$50,000, and such amended Maximum Agreement Amount applies to and increases the amount stated for Formation & Authorization in Article 4. Such increased amount is approved for payment following the formation of the Community Facilities District at this meeting.

Section 4. The officers of the City are hereby authorized and directed, jointly and severally, to do any and all things and to execute and deliver any and all documents that they deem necessary or advisable in order to carry out, give effect to and comply with the terms and intent of this Resolution and the financing approved hereby.

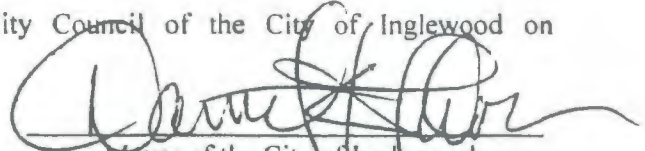
Section 5. The officers, employees and agents of the City are hereby authorized and directed to take all actions and do all things which they, or any of them, may deem necessary or desirable to accomplish the purposes of this Resolution and not inconsistent with the provisions hereof.

Section 6. The officers and employees of the City are, and each of them is, hereby authorized and directed, for and in the name of the Community Facilities District and the City, as applicable, to do any and all things and to execute and deliver any and all documents which they or any of them deem necessary or advisable in order to consummate the transactions contemplated by this Resolution and otherwise to carry out, give effect to and comply with the terms and intent of this Resolution.

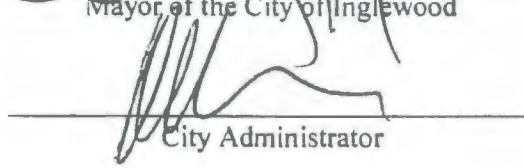
Section 7. All actions heretofore taken by the officers and employees of the City in connection with or related to any of the agreements or documents referred to herein, are hereby approved, confirmed and ratified.

Section 8. This Resolution shall take effect immediately upon its adoption.

PASSED AND ADOPTED by the City Council of the City of Inglewood on
December 7, 2010.



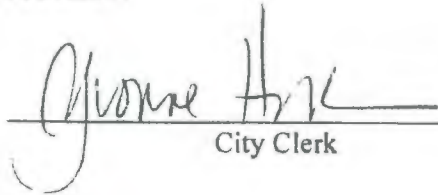
Mayor of the City of Inglewood



City Administrator

(SEAL)

ATTEST:



City Clerk

APPROVED AS TO FORM:



City Attorney

FINAL ENVIRONMENTAL IMPACT REPORT AND TECHNICAL APPENDICES

FOR THE

HOLLYWOOD PARK REDEVELOPMENT PROJECT

SUBMITTED TO:

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

May 8, 2009

SUBMITTED BY:



CHRISTOPHER A. JOSEPH & ASSOCIATES
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FINAL ENVIRONMENTAL IMPACT REPORT

Hollywood Park Redevelopment Project

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

Prepared for:

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

Prepared By:



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

May 8, 2009

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APPENDIX C-1:	<u>Final Report – Geologic Investigation of The Potrero Fault, Hollywood Park, Inglewood CA, Geomatrix Consultants, Inc., December 2005.</u>
APPENDIX C-2:	<u>Geotechnical Evaluation For Environmental Impact Report, Proposed Residential And Commercial Development, Hollywood Park Redevelopment, Inglewood, CA, Group Delta Consultants, Inc. March 30, 2007.</u>
APPENDIX D-1:	<u>Soil Management Plan, Hollywood Park Racetrack & Casino, 1050 S. Prairie Avenue, Inglewood CA, Erler & Kalinowski, Inc. July 3, 2007.</u>
APPENDIX D-2:	<u>Phase I Environmental Site Assessment and Limited Compliance Assessment, Hollywood Park, Inglewood, CA, ENVIRON International Corporation, April 11, 2005.</u>
APPENDIX E-1:	<u>Historic Resources Technical Report, Historic Resources Survey, Evaluation, and Analysis of Project Impacts – Final – Hollywood Park Project, CA, Page & Turnbull, Inc. July 24, 2007.</u>
APPENDIX E-2:	<u>Record Search for the Hollywood Park Redevelopment Project, City of Inglewood, South Central Coastal Information Center – California Historical Resources Information System, California State University – Fullerton, Department of Archaeology, July 24, 2007.</u>
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- APPENDIX G-1: Draft Traffic Impact Study, Hollywood Park Redevelopment Project, City of Inglewood CA, Linscott, Law & Greenspan Engineers, August 1, 2008.
- APPENDIX G-2: Shared Parking Analysis, Hollywood Park Redevelopment Project, City of Inglewood CA, Walker Parking Consultants, September 25, 2007.
- APPENDIX H: The Future of Horseracing In California: Can The Industry Survive Without “Racinos?,”LECG, October 12, 2005.
- APPENDIX I: Potential for the Hollywood Park Redevelopment Project to Cause “Urban Decay” Technical Memorandum, HR&A Advisors, Inc., June 2, 2008.
- APPENDIX J: Comment Letters Received on the Draft EIR.
- APPENDIX K: (1) Memorandum Re: Updated Traffic Impact Analysis, Linscott, Law & Greenspan Engineers, February 26, 2009.
- (2) Appendix A: Updated Traffic Impact Analysis - ICU Data Worksheets – Weekday AM & PM Peak Hours – Saturday Mid-Day Peak Hour.
- (3) Appendix B: Supplemental Traffic Evaluation – Additional Study Intersections, Manual Traffic Counts, ICU Data Worksheets – Weekday AM&PM Peak Hours – Saturday Mid-Day Peak Hour.
- (4) Appendix C: Supplemental Traffic Evaluation – Baseline Conditions to Reflect Live Horseracing. ICU Data Worksheets – Weekday AM&PM Peak Hours – Saturday Mid-Day Peak Hour.
- (5) Appendix D: Supplemental Traffic Evaluation – With Local Schools in Session. ICU Data Worksheets – Weekday AM&PM Peak Hours – Saturday Mid-Day Peak Hour.
- (6) Reference data for Response to Comment 2.4 - Intersection Capacity Utilization
- (7) Reference Data for Response to Comments 7.13, 18.4, and 18.5 Re: Internal Capture and Pass-By Trip Credits.
- (8) Reference Data for Response to Comment 7.19: Memorandum Re: Hollywood Park Redevelopment Project Supplemental Traffic Assessment - Internal Study Locations, November 26, 2008.
- (9) Reference Data for Response to Comment 9.84: ITE Trip Generation Manual Graphic for Residential Condominiums/Townhouses (230) Depicting Average Vehicle Trip Ends.

(10) Reference Data for Response to Comment 20.2: ITE Journal Study: Recalibration of Trip Generation Model for Las Vegas Hotel/Casinos, by Curtis D. Rowe, Mohamed S. Kaseko and Kenneth W. Ackeret.

- APPENDIX L: Walker Parking Consultants, Shared Parking Analysis Hollywood Park Redevelopment, Inglewood CA. February 9, 2009.
- APPENDIX M: Historic Resources Memorandum Re: DEIR Responses to Comments, From Jay Turnbull & Rich Sucre, To Sheldon Curry, dated January 19, 2009.
- APPENDIX N: Terry A. Hayes Associates, Revised Global Warming Calculation Worksheets, February 17, 2009.
- APPENDIX O: Memorandum from Group Delta Consultants Re: Potential Geologic Hazard – Tsunami, Seiche, and Mudslide, dated January 26, 2009.
- APPENDIX P: First Supplemental Responses to Comments.
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I. INTRODUCTION/EXECUTIVE SUMMARY

INTRODUCTION/OVERVIEW OF THE CEQA PROCESS

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

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

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

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

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement

¹ Public Resources Code Sections 21000-21177.

² California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.

among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

Notice of Preparation

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

NOP Comment Letters

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

requesting to be kept informed of the project and questioned how the City of Inglewood plans to implement Senate Bill (SB) 2, Fair Share Housing Legislation, within its Housing Element Update. Cecil Carpio, a local resident, provided comments pertaining to the EIR process and public agency notification (see Section I., Introduction), project alternatives (see Section VI., Alternatives to the Proposed Project, and project phasing (see Section II., Project Description). Each of the comment letters referenced above are provided in their entirety in Appendix A-3 to this EIR.

Environmental Issues Analyzed in the Draft EIR

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

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

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

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

Environmental Review Process

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

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

Draft EIR Comment Letters

In response to the Draft EIR, a total of 21 comment letters were received on the Draft EIR. One State Agency comment letter was received. The State of California, Office of Planning and Research, State Clearinghouse and Planning Unit provided a comment letter acknowledging that the Draft EIR was circulated for public review in accordance with CEQA requirements and that no other state agencies had submitted comments. Five comment letters were submitted by various departments within the County of Los Angeles: (1) Department of Public Works, Land Development Division, (2) Sanitation Districts, Facilities Planning Department, (3) Regional Planning Commission, Airport Land Use Commission, (4) Department of Public Works, Flood Maintenance Division, and (5) the Fire Department. Seven separate comment letters were submitted by the lead agency and its consultants. Two comment letters were submitted by service providers: the Southern California Gas Company and Sage Institute Inc., the District Consultant for Inglewood Unified School District. One letter was submitted by Habitat for Humanity in support for affordable housing. And, three comment letters were submitted by individuals with concerns and opinions regarding the project and its environmental impacts. Copies of all of these comment letters are contained in Appendix J to this Final EIR. Detailed responses to each of the comments contained in these letters are contained in Section IV, Responses to Comments, in this Final EIR.

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

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

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

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

ORGANIZATION OF THE FINAL EIR

The Final EIR incorporates the Draft EIR by reference and provides the following additional sections:

Section I. Introduction/Executive Summary: This section provides a re-print of Section I, Introduction/Executive Summary, of the Draft EIR. Any substantive changes to this chapter are clearly shown in double underline/~~strike~~ text to note the changes that have occurred since the Draft EIR was circulated for public review.

Section II. Project Description: This section provides a re-print of Section II, Project Description, of the Draft EIR. Any substantive changes to this chapter are clearly shown in double underline/~~strike~~ text to note the changes that have occurred since the Draft EIR was circulated for public review.

Section III. Additions and Corrections to the Draft EIR: This section contains a summarized account of all of the additions and corrections to the Draft EIR that have been proposed by the lead agency in response to the comments received on the Draft EIR. The additions and corrections are organized by environmental issues and chapters as contained in the Draft EIR. This Section also contains the following three revised and re-printed Draft EIR Sections: IV.C. Geology/Soils, IV.L Traffic and Transportation, and IV.M Parking.

Section IV. Responses to Comments: Pursuant to Section 15088 of the State CEQA Guidelines, this Section contains a list of the comments received on the Draft EIR and provides written responses to each substantive issue raised in the comment letters.

Section V. Mitigation Monitoring and Reporting Program: Pursuant to Section 15097 a lead agency is required to adopt and implement a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. This Section includes a draft Mitigation Monitoring and Reporting Program containing a consolidated list of the various project design features and mitigation measures included for the Project.

PROPOSED PROJECT

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

The Proposed Project is intended to serve as an energetic collection of new residential neighborhoods, connected by expansive open space, to a vibrant shopping, dining and entertainment district. The urban design strives to place all uses within easy walking distance of each other. Construction of the Proposed Project on the currently underutilized site will benefit the surrounding area through the provision of a mix of retail, residential and commercial uses that are currently not available within the City. The provision of housing would be a welcome addition to the community, and would serve to improve the regional jobs/housing balance. The Proposed Project will result in a net increase of 517 jobs. Inglewood is an area that is in need of additional parks and recreation spaces and the Proposed Project would help address this need by providing for 25 acres of land as park, recreation and open space to serve the project residents as well as the broader community. The Proposed Project would also provide a 4-acre site

that can be used for civic uses such as a school, library, joint use facility, or community center. The Proposed Project will contribute to the quality of life of the existing neighborhood by providing uses that are compatible with adjacent land use patterns, reducing overall ambient noise on weekdays and significantly reducing light and glare impacts when compared with the existing uses.

ALTERNATIVES TO THE PROPOSED PROJECT

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

- No Project Alternative – Continuation of Existing Land Use: This alternative analyzes the environmental consequences of the on-going operation of the existing Hollywood Park Racetrack and Casino ~~without any new discretionary requests~~.
- No Project Alternative – Reasonably Foreseeable Future Development (Football Stadium/Casino) Alternative: This Alternative evaluates a theoretical scenario in which the Proposed Project does not go forward, but an alternative project consistent with the underlying zoning regulations is developed. The development of an athletic stadium is considered a reasonably foreseeable development because (1) it is consistent with the current zoning designation, and (2) it represents a development proposal that was previously proposed and analyzed in an EIR in 1995. This alternative analyzes the impacts of demolishing the existing Grandstand, Racetrack and Barn Areas, while retaining the Casino and constructing an approximate 65,000 seat Athletic Stadium.
- No Project Alternative – Reasonably Foreseeable Future Development (Convention Center/Hotel/Casino) Alternative: This Alternative evaluates a theoretical scenario in which the Proposed Project does not go forward, but an alternative project consistent with the underlying zoning regulations is developed. The Convention Center Alternative would require public acquisition of the site and construction resulting in the development of a state-of-the-art convention center facility containing 300,000 sf of exhibition space, 50,000 sf of meeting space, a 50,000 sf ballroom, and a 650-room hotel. This Alternative analyzes the impacts of the continued operation of the existing Casino, the removal and discontinuation of the existing racetrack component, and the addition of the Convention Center, Hotel, and associated uses.
- Alternative RU 800/Reduced residential (800 units maximum)/retention of racing and racetrack: This Alternative involves a reduced residential project with retention of racing and the racetrack and the removal of the casino. This alternative analyzes the impacts of retaining racing at Hollywood Park, while utilizing the surrounding surface parking lots for the development of on-site residential uses. Although there are no identified adverse

environmental impacts relative to demolition of the racetrack and relocation of racing, as part of the community outreach process conducted during the earlier phases of the planning process, some have raised the question of whether new development can be attained without loss of live racing at Hollywood Park. This alternative analyzes the potential impacts of such an approach.

- Alternative RU 1,000/All single-family alternative/residential density, 1,000 units: This Alternative involves the demolition of the racetrack and Casino, and the construction of an all single-family residential development with 1,000 dwelling units. This alternative analyzes the impacts of developing ownership housing opportunities on-site, but exclusively in a single-family configuration, without the additional commercial uses, cinema, office, hotel and retail.
- Alternative RU 3,500/Increased Residential Project/3,500 Dwelling Units: This Alternative includes the retention of the Casino and demolition of the Racetrack, and it provides an increased residential project with 3,500 dwelling units. This alternative analyzes the impacts of providing additional housing opportunities on-site. To the extent, for example, affordable housing is located on-site in addition to housing proposed by the project, this alternative provides information regarding the impacts of the additional units.
- Maximum Housing Unit Alternative (with Affordable Housing): This Alternative includes the retention of the Casino and demolition of the Racetrack, and it maximizes the construction of housing, in particular, affordable housing. Specifically, this Alternative includes the development of a maximum of 3,500 dwelling units on the Project Site, a maximum of 525 affordable dwelling units (to be provided off-site within the Merged Redevelopment Project Area), approximately 620,000 sf of retail use, approximately 120,000 sf of casino use, a 300-room hotel with 20,000 sf of meeting room space, approximately 25,000 sf of office space, approximately 25 acres of open space, and approximately 10,000 sf of community space. A four-acre site would also be made available for civic uses which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility.

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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

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

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

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>property line and roadway widths, none of the Proposed Project's structures would cast shadows upon residences or other adjacent land uses for more than 3 hours during the summer or winter months and the project's shade and shadow impacts would be less than significant.</p>		
<p>Land Use Equivalency Program. The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses within the Hollywood Park Specific Plan Area. The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. All mitigation measures to minimize visual quality impacts would be implemented. Therefore, development under all of the Equivalency Scenarios would have a visual character that is similar to and would be consistent with that of the Proposed Project, and would result in less than significant impacts.</p>		<p>Less Than Significant Impact.</p>
<p>IV.B AIR QUALITY</p>		
<p>Construction Phase Air Quality Impacts</p>		
<p>Regional Emissions. Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Specifically, construction emissions would exceed the SCAQMD regional daily threshold limits for VOC, NO_x, PM_{2.5}, and PM₁₀. As such the Project's construction related impacts would be significant.</p>	<p>MM B-1. Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.</p> <p>MM B-2. Track-out shall not extend 25 feet or more from an active operation, and track-out shall be removed at the conclusion of each workday.³</p>	<p>Significant Unavoidable Impact.</p>
<p>Localized Emissions. Construction of the Project would generate PM_{2.5}, PM₁₀, and NO_x. Localized CO emissions would be less than the SCAQMD daily significance thresholds. However, localized emissions of PM_{2.5}, PM₁₀, and NO₂ would exceed the localized thresholds. The maximum localized emissions would be temporary and would generally</p>	<p>MM B-3. A wheel washing system shall be installed and used to remove bulk material from tires and vehicle undercarriages</p>	<p>Significant Unavoidable Impact.</p>

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

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

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p><u>construction activity would result in a less than significant ACM impact.</u></p>	<p>of five minutes, both on- and off-site.</p>	
<p>Odors. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the project site; resulting in a less-than-significant impact.</p>	<p>MM B-13. Construction parking shall be configured to minimize traffic interference.</p> <p>MM B-14. Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours, as feasible.</p> <p>MM B-15. Architectural coatings shall be purchased from a super-compliant architectural coating manufacturer as identified by the SCAQMD (http://www.aqmd.gov/prdas/brochures/Super-Compliant_AIM.pdf).</p> <p>MM B-16. Spray equipment with high transfer efficiency, such as the electrostatic spray gun or manual coatings application (e.g., paint brush and hand roller), shall be used to reduce VOC emissions.</p> <p><u>MM B-17. All diesel powered construction equipment in use shall require control equipment that meets at a minimum Tier III emissions requirements. In the event Tier III equipment is not available, diesel powered construction equipment in use shall require emissions control equipment with a minimum of Tier II diesel standards.</u></p> <p><u>MM B-18. Contractors shall utilize alternative fueled off-road equipment where possible.</u></p> <p><u>MM B-19. Contractors shall provide temporary traffic controls, such</u></p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p><u>as a flag person, during all phases of construct to maintain smooth traffic flows.</u></p> <p><u>MM B-20. Contractors shall schedule construction activities that effect traffic flow on arterial system to off-peak hour to the extent practicable.</u></p>	
Operational Phase Air Quality Impacts		
<p>Regional Emissions. Long-term operational project emissions would be generated by area sources, such as natural gas combustion and consumer products (e.g., aerosol sprays) and mobile sources. Motor vehicles generated by the proposed project would be the predominate source of long-term project emissions. Specifically, operation of the Project would generate VOC, NO_x, CO, PM_{2.5}, and PM₁₀. Weekday and weekend regional operational emissions would exceed SCAQMD significance thresholds for VOC, NO_x, CO, PM_{2.5}, and PM₁₀. As such, regional operational emissions would result in a significant air quality impact.</p>	<p><u>MM B-1721.</u> The Applicant shall install automatic lighting on/off controls and energy-efficient lighting for office spaces.</p> <p><u>MM B-1822.</u> The Applicant shall provide informational packets to new residents within the development locating nearby public transportation options.</p>	<p>Significant Unavoidable Impact.</p>
<p>Concurrent Emissions. Later stages of project construction could occur concurrently with the occupancy of the earlier stages of development. Construction emissions combined with operational emissions would result in concurrent emissions that exceed the SCAQMD significance thresholds for VOC, NO_x, CO, PM_{2.5}, and PM₁₀. As such, the Proposed Project would result in a significant emissions impact associated with concurrent emissions.</p>		<p>Significant Unavoidable Impact.</p>
<p>CO Concentrations. The USEPA CAL3QHC micro-scale dispersion model was used to calculate CO concentrations at the six study intersections for a localized CO hotspot analysis for 2014 “no project” and “project” conditions. The maximum one-hour and eight-hour CO concentrations under “project” conditions would be 3 ppm and 1.8 to 2.1 ppm, respectively, at worst-case sidewalk receptors. These emissions would be below the State one- and eight-hour standards of 20 ppm and</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>9.0 ppm, respectively. Thus, a less-than-significant impact is anticipated and no significant increase in CO concentrations at sensitive receptor locations is expected.</p>		
<p>Toxic Air Contaminants. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes and automotive repair facilities. The proposed project would not include any of these potential sources, although minimal emissions may result from the use of consumer products (e.g., aerosol sprays). As such, <u>the operation of the proposed project would not release substantial amounts of TACs, and impacts would be less than significant.</u></p>		<p>Less Than Significant Impact.</p>
<p>Odors. The project site would be developed with residential, hotel, casino/gaming, civic, open spaces, retail and office/commercial space and not land uses that are typically associated with odor complaints. On-site trash receptacles would be located and maintained in a manner that promotes odor control, and no adverse odor impacts are anticipated from these types of land uses. Impacts would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>AQMP Consistency. The Proposed Project would not be consistent with the AQMP due to a technical inconsistency with the SCAG growth projections underlying the AQMP. However, many of the design aspects of the project are consistent with the goals of the AQMP. The proposed mixed-use development would (a) potentially reduce regional vehicle miles traveled by decreasing residential to retail trip lengths, and (b) would be located near heavily traveled roadways that are serviced by the L.A. County MTA. Despite the consistency with the spirit and intent of the AQMP, it would not be consistent with the growth assumptions included in the AQMP. <u>In addition, per consistency with Criterion 1, the Project would result in significant VOC, NO_x, CO, PM_{2.5}, and PM₁₀ impacts during operations. The Basin is a non-attainment area under the CCAA for O₃ and the Project would exceed the regional daily emissions threshold for ozone precursors, VOC and NO_x. The Basin is also a non-attainment area under the CCAA for PM_{2.5} and PM₁₀ and the Project would exceed the regional daily emissions thresholds for PM_{2.5} and PM₁₀. The Project would potentially increase the frequency of O₃, PM_{2.5}, and</u></p>		<p>Significant Unavoidable Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p><u>PM₁₀ air quality violations.</u> Therefore, impacts will be significant and unavoidable.</p>		
<p>Greenhouse Gas Emissions. Greenhouse gas emissions associated with the Proposed Project have been identified and quantified. These emissions are associated with increased electricity consumption, natural gas combustion and mobile source emissions due to project-generated traffic. The Proposed Project would emit an estimated additional 53,227<u>50,778</u> tons per year of CO₂ equivalent emissions above the existing development levels. It is not possible at this time to quantify the exact reductions in greenhouse gas emissions anticipated from the smart growth and sustainability design features of the Proposed Project. By incorporating energy and VMT reducing project design features and example GHG reduction measures provided in the Governor’s Office of Planning and Research technical advisory on CEQA and climate change, the Proposed Project will result in lower GHG emission rates compared to current standards and practices. Given the lack of standards and the proposed project features consistency with the State and City’s goals, the contribution to the cumulative impact of global climate change is considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Land Use Equivalency Program. Potential changes in land use under the Equivalency Program would have no substantial effect on the air quality analysis because only the use is changing. Regional and local air quality impacts during operations under the Equivalency Program would be comparable to those of the Proposed Project as the trip generation and trip distribution characteristics of the Equivalency Program and the Proposed Project would also be comparable. Potential sources of toxic air contaminants and odors under the Equivalency Program would be the same as those associated with the Proposed Project, and, thus, impacts would be the same. Concurrent construction and operations emissions under the Equivalency Program would also be comparable to the Proposed Project as levels of construction activity and traffic would also be comparable. In addition, as is the case with the Proposed Project, the Equivalency Program would be comparable in consistency findings with adopted plans and policies. Overall, the Equivalency program, as is the</p>		<p>Significant Unavoidable Impact.</p>

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

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

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Site Preparation/Grading/Earth Removal. Prior to the start of grading, demolition will be required to remove any existing improvements, including pavement and structures. Buried remnants of previous construction could be encountered anywhere on the site, including foundations, walls, slabs, basements, mud pits, cesspools, tanks and utilities. With adherence to the geotechnical engineering recommendations in the Geotechnical Report, and the mitigation measures identified herein, impacts with respect to <u>exposing people or structures to hazards associated with unstable geologic units or soils due to site preparation, grading and earth removals</u> would be less than significant.</p>	<p>interruption.</p> <p>MM C-7. Prior to site grading, <u>the developer shall submit to the City of Inglewood Planning and Building Department a site-specific evaluation of soil conditions that is prepared by a registered soil professional that includes recommendations for ground preparation and earthwork activities specific to the site, soil removal and replacement, and other site-specific earthwork activities and in conformance with the City's Building Code.</u> uncertified fill and soft native soils should be removed and replaced with structural fill. It should be anticipated that unsuitable oversized debris may be present in the existing fill on site. The actual limits for removals should be determined by the project Geotechnical Engineer depending on the actual conditions encountered, consistent with the findings of a site specific geotechnical evaluation.</p>	<p>Less Than Significant Impact.</p>
<p>Geologic Hazards. A potentially significant adverse impact could occur with respect to causing or accelerating geologic hazards associated with the accidental discovery of undocumented and/or abandoned oil wells which could result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Potentially adverse impacts associated with this hazard could be reduced to a less-than-significant level by abandoning accidentally encountered wells according to the current requirements of the California Division of Oil and Gas.</p>	<p>It should be anticipated that unsuitable oversized debris may be present in the existing fill on site. The actual limits for removals should be determined by the project Geotechnical Engineer depending on the actual conditions encountered, consistent with the findings of a site specific geotechnical evaluation.</p>	<p>Less Than Significant Impact.</p>
<p>Groundwater. Groundwater was encountered during subsurface investigations on the Project Site between approximately 70 to 170 feet below ground surface (bgs). The proposed soils removal ranges between 3 feet and 22.5 feet bgs, well above the shallowest recorded depth to groundwater of 72.45 feet bgs. Therefore, ground water is not likely to be encountered within the depth of the proposed excavation. It is possible, however, that locally perched groundwater could be encountered and has the potential to impact the proposed development during construction. Compliance with the geotechnical recommendations provided by the project engineer would effectively mitigate any adverse impacts associated with groundwater to less-than-significant levels.</p>	<p>MM C-8. During earthwork activities, the bottoms of completed excavations shall be observed by the project Geotechnical Engineer, while it is proof-rolled with loaded equipment. Any loose or yielding soils shall be over-excavated and recompacted to the limits determined by the project Geotechnical Engineer.</p> <p>MM C-9. Structural fill should consist of predominantly sandy soils, and should be free of expansive clay, rock greater than 3 inches in maximum size, debris and other deleterious materials. All structural fill should be compacted to at least 95 percent of the maximum dry density determined by</p>	<p>Less Than Significant Impact.</p>
<p>Land Use Equivalency Program. The proposed Equivalency Program allows for specific limited exchanges in types of land uses occurring on the Project Site. Potential changes in land use under the Equivalency</p>	<p>95 percent of the maximum dry density determined by</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Program would have no substantial effect on the proposed earth moving activities, including impacts from seismic hazards, landslides, erosion and topsoil, expansive soils, site preparation, grading and earth removal and their associated impacts because only the use of the land is changing. With implementation of the applicable mitigation measures, geologic and soil impacts attributable to the Equivalency Program would be less than significant.</p>	<p>ASTM D 1557-91. Fill placed in nonstructural and landscape areas should be compacted to at least 90 percent.</p> <p>MM C-10. All earthwork and grading shall be performed under the observation of the project Geotechnical Engineer. Compaction testing of the fill soils shall be performed at the discretion of the project Geotechnical Engineer. Testing shall be performed for approximately every 2 feet in fill thickness or 500 cubic yards of fill placed, whichever occurs first. If specified compaction is not achieved, additional compactive effort, moisture conditioning, and/or removal and recompaction of the fill soils will be required.</p> <p>MM C-11. All materials used for asphalt concrete and base shall conform to the 2000 “Green Book” or the equivalent, and shall be compacted to at least 95 percent relative compaction.</p> <p>MM C-12. If, in the opinion of the Geotechnical Engineer, Contractor, or Owner, an unsafe condition is created or encountered during grading, all work in the area shall be stopped until measures can be taken to mitigate the unsafe condition. An unsafe condition shall be considered any condition that creates a danger to workers, onsite structures, on-site construction, or any off-site properties or persons.</p> <p>MM C-13. Groundwater encountered during temporary excavations shall be controlled using shallow trenches, sumps and pumps. In general, temporary excavations up to 3 feet deep may stand in vertical cuts; sandier layers should be sloped.</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>Construction slopes in the parking Area and Barn Area should be made with an inclination of 1 (H) to 1(V). Construction slopes in the Track Area should be made with an inclination of 1.5 (H) to 1 (V). If the above-recommended slopes are not feasible due to site restrictions, or if surcharge loads other than a nominal value of 240 psf due to traffic loads exist adjacent to the excavation, a flatter slope or temporary shoring may be needed. Earth pressure can be provided if temporary shoring is to be used.</p> <p>MM C-14. Surcharge loads, such as vehicular traffic, heavy construction equipment, and stockpiled materials, should be kept away from the top of temporary excavations a horizontal distance at least equal to the depth of excavation. Surface drainage should be controlled and prevented from running down the slope face. Poned water should not be allowed within the excavation. Workmen should be adequately protected within temporary excavations. Construction equipment and foot traffic should be kept off excavation slopes to minimize sloughing.</p> <p>MM C-15. All excavation slopes and shoring systems should meet the minimum requirements of the Occupational Safety and Health Association (OSHA) Standards. Maintaining safe and stable slopes on excavations is the responsibility of the contractor and will depend on the nature of the soils and groundwater conditions encountered and his method of excavation. Excavations during construction should be carried out in such a manner that failure or ground</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>movement will not occur. The contractor should perform any additional studies deemed necessary to supplement the information contained in this report for the purpose of planning and executing his excavation plan.</p> <p>MM C-16. It should be anticipated that a site specific design-level geotechnical report for each new project within the tract will be required. Specifically, after detailed building plans have been developed for each area of the Project Site, additional geotechnical explorations, testing, and analyses shall be performed, as warranted, in order to develop building-specific foundation recommendations. The Project shall be designed and constructed in accordance with the recommendations provided in these additional site specific geotechnical reports.</p> <p>MM C-17. The expansion potential of subgrade soils within foundation depth under building pads should be tested in building specific site investigations, and recommendations regarding expansive soils should be presented in site - specific geotechnical reports.</p> <p>MM C-18. Soil corrosivity should be tested in building specific site investigations. This potential should be considered in the design and protection of underground metal utilities.</p> <p>MM C-19. Assuming R-values of 15 after grading, the following pavement sections for Traffic Index (TI) values of 5, 6, and 7 are recommended:</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation								
	<table border="0"> <tr> <td data-bbox="1003 321 1325 354"><u>Traffic Index (TI) Section</u></td> <td data-bbox="1325 321 1707 354"><u>Thickness (Feet) AC Over AB</u></td> </tr> <tr> <td data-bbox="1003 386 1325 418">5</td> <td data-bbox="1325 386 1707 418">0.25 AC/0.65 AB</td> </tr> <tr> <td data-bbox="1003 451 1325 483">6</td> <td data-bbox="1325 451 1707 483">0.30 AC/0.85 AB</td> </tr> <tr> <td data-bbox="1003 516 1325 548">7</td> <td data-bbox="1325 516 1707 548">0.35 AC/1.05 AB</td> </tr> </table> <p data-bbox="1062 597 1696 954">Traffic Index value 5 is recommended for car parking and non-truck driveways. Traffic index of 6 or higher may be used for truck areas or for the streets. The upper 24 inches of sub grade supporting pavements should be compacted to at least 95 percent relative compaction (ASTM D1557-1990). For PCC pavements in areas of some truck traffic, a pavement section of 6 in PCC over 12 inch of aggregate base is recommended. Actual pavement section thickness is subject to verification based on the “R” values of on-site soils, which are expected to be tested after grading.</p> <p data-bbox="909 995 1696 1206">MM C-20. Proper quality control of grading is required. The Project Applicant shall ensure geotechnical testing and observation be conducted on-site by a state certified geotechnical engineer during any excavation and earthwork activities to ensure that recommendations provided in the Project Geotechnical Report are implemented where applicable.</p>	<u>Traffic Index (TI) Section</u>	<u>Thickness (Feet) AC Over AB</u>	5	0.25 AC/0.65 AB	6	0.30 AC/0.85 AB	7	0.35 AC/1.05 AB	
<u>Traffic Index (TI) Section</u>	<u>Thickness (Feet) AC Over AB</u>									
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Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
IV.D HAZARDOUS MATERIALS-RISK OF UPSET		
Construction Impacts		
<p>Routine Transport, Use, or Disposal of Potentially Hazardous Materials. The Proposed Project is anticipated to require the routine transport, use, and disposal of cleaning solvents, fuels, and other hazardous materials commonly associated with construction projects. All hazardous materials encountered or used during demolition, grading/excavation, and construction activities would be handled in accordance with all applicable local, State, and federal regulations, which include requirements for disposal of hazardous materials at a facility licensed to accept such waste, based on its waste classification and the waste acceptance criteria of the permitted disposal facilities. As compliance with existing regulations is mandatory for all development projects, adherence to all applicable rules and regulations would reduce potentially significant impacts with respect to routine transport, use, and disposal of hazardous materials during construction to less-than-significant levels.</p>	<p>MM D-1. The Project Applicant shall implement the RWQCB-approved SMP environmental risk management protocols under RWQCB oversight during the Project.</p> <p>MM D-2. COPCs encountered at the Property in soil and soil gas during the Project and implementation of the SMP shall be investigated, and concentrations of COPCs determined to be above the Property-specific criteria listed in the SMP will be remediated as part of the Project in accordance with the SMP approved by the RWQCB.</p> <p>MM D-3. Groundwater is not expected to be encountered during work activities associated with the Project. Groundwater on the Property, if discovered during the Project to contain COPCs, will be addressed as required by RWQCB.</p>	<p>Less Than Significant Impact.</p>
<p>Accidental Release of Hazardous Materials. There are four areas at the Project site that will be addressed prior to, or during, grading with RWQCB oversight and approval, and three general areas at the Project Site that will be addressed during demolition. Within these four areas, hazardous materials were detected in soil gas and soil at concentrations above the Property-specific criteria defined in the SMP. Remediation of these small, localized areas of soil impact will be performed prior to or during Property grading, likely by excavation and off-site disposal of soil identified to contain COPCs above the criteria. These four areas will be addressed as part of the Project with oversight and approval from the RWQCB. Remaining fuel USTs used during Hollywood Park operations will be emptied and removed in accordance with the closure requirements of local agencies, including LAFD, LADPW, SCAQMD, and City of Inglewood.</p>	<p>MM D-4. Former oil and gas wells at the Property shall be located, inspected, and reabandoned, if necessary, as required by DOGGR consistent with proximate land use. Former oil and gas wells at the Property shall be located and inspected per DOGGR guidelines. Reabandonment of wells shall be in accordance with DOGGR statute.</p> <p>MM D-5. Prior to the issuance of the building demolition permit by City of Inglewood, the Project Applicant will submit to the City of Inglewood proof of certification from its selected contractor showing qualification to handle asbestos and</p>	<p>Less Than Significant Impact.</p>
<p>Sensitive Receptors, Including Schools. The Project Site is located near</p>		<p>Less Than Significant</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>several sensitive receptors with respect to hazardous materials (i.e., schools, residences, day care facilities, etc.). As such, the Project could result in a potentially significant impact related to exposure of nearby students and neighbors to accidental release of the following hazardous material during demolition, excavation, and construction activities: ACM, LBP, contents of underground storage tanks, soil containing COPCs above Property-specific criteria defined in the SMP, and natural gas, if not property managed. Risks associated with accidental release of potentially hazardous materials during construction would be reduced to less-than-significant levels and such materials would not be expected to endanger sensitive receptors in the project vicinity.</p>	<p>lead-based paint. Proper removal and remediation actions will be undertaken in conformance with the regulations of the South Coast Air Quality Management District and the State of California, Division of Occupational Health and Safety.</p>	<p>Impact.</p>
<p>Listed Hazardous Materials Sites. The Project Site address is listed on one or more government regulatory databases. Potentially hazardous chemicals such as fuels, paints, solvents and oils used during Hollywood Park operations on the Property will be removed from the Project Site during the demolition phase of the Project, along with ACM and LBP as required prior to the demolition of structures.</p>	<p>MM D-6. Any COPC-containing soil stockpiled at the Project site shall be stored in accordance with the SMP approved by the RWQCB and in such a manner that underlying soils are not cross-contaminated. This could be accomplished by the use of plastic sheeting placed under and on top of the stockpiled materials, or other suitable methods. The management, treatment, or disposal of such material shall comply with all federal, state, and local regulations related to hazardous waste, as applicable. All stockpiled materials shall be protected in order to prevent materials from being washed into storm drains, in accordance with the Project storm water pollution prevention plan (“SWPPP”).</p>	<p>Less Than Significant Impact.</p>
<p>Emergency Response Plans. The Proposed Project is located along Century Boulevard, a designated evacuation route in the City of Inglewood. Development of the Project Site may require temporary and/or partial street closures along Century Boulevard due to construction activities. While such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans and would be conducted in accordance with the City’s permitting process. Therefore, the Project would not be expected to interfere with any adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.</p>	<p>MM D-7. Handling and removal of hazardous materials will comply with federal, state and local regulations, which include requirements for disposal of hazardous materials at facilities licensed to accept such waste.</p>	<p>Less Than Significant Impact.</p>
<p>Aircraft Overflight. The Project is located within 2 miles of Los Angeles International Airport. The Project would be developed in accordance with the development guidelines of the applicable Airport Land Use Plan and would not negatively impact safe air navigation or the safety of people residing or working in the project area.</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
Operational Impacts.		
<p>Routine Transport, Use, or Disposal of Potentially Hazardous Materials. Minor quantities of potentially hazardous materials will be stored or used on the Property as part of the planned residential, commercial and recreational land uses; no industrial land uses are planned. Limited quantities of potentially hazardous materials would be handled, transported, and disposed in accordance with all applicable local, State, and federal regulations. Therefore, impacts would be less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant Impact.</p>
<p>Accidental Release of Hazardous Materials. Minor quantities of potentially hazardous materials commonly associated with commercial and residential uses are expected to be stored or used on the Property as part of the completed Project. Accidental releases of potentially hazardous materials, such as janitorial or household chemicals associated with the residential and commercial land uses proposed could occur, but such releases would be minor and, thus, considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Listed Hazardous Materials Sites. Following completion of the activities defined in the SMP, no known areas of the Property should exist that contain COPCs in soil or soil gas at concentrations above their respective Property-specific soil or soil gas criteria listed in the SMP, unless such areas were determined to the satisfaction of the RWQCB to present no unacceptable risk to human health, the environment, or groundwater quality (e.g., deeper or covered soils, where there are none). As such, areas where soil and soil gas concentrations meet the criteria for residential land use listed in the SMP will be acceptable for unrestricted land use. If the Project Applicant chooses to apply the commercial/industrial land use criteria in specific areas of the Property where such criteria would be consistent with the planned land use, the potentially exposed populations, and potentially complete exposure pathways, these areas may be subject to land use restrictions determined pursuant to future agreement by the Project Applicant and RWQCB.</p>		<p>Less Than Significant Impact.</p>
<p>Sensitive Receptors, Including Schools. The Project Site is located</p>		<p>Less Than Significant</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>adjacent to and in the immediate vicinity of residences and schools that have been identified as sensitive receptors with respect to potential releases of hazardous materials. No substantial quantities of hazardous materials would be used, transported or disposed of in conjunction with the routine day-to-day operations of the Proposed Project and such materials would not be expected to endanger sensitive receptors in the project vicinity. Therefore, impacts would be less than significant.</p>		Impact.
<p>Land Use Equivalency Program. The Land Use Equivalency Program allows for specific limited exchanges in the types of land uses. The potential risk of exposure to safety and health hazards for Project development would be the same under the Land Use Equivalency Program. Very minor variations regarding foundation types or in the preparation of landscaping areas could occur, however, such variations would be within the range of construction procedures anticipated to occur with the Proposed Project. In addition, development under the Land Use Equivalency Program would not cause or exacerbate any hazardous material/risk of upset impacts that would occur under the Proposed Project.</p>		Less Than Significant Impact.
<p>IV.E CULTURAL RESOURCES</p>		
<p>Historic Resources. As none of the buildings on the Project Site are classified as a historic resource pursuant to CEQA or under the National Register of Historic Places or the California Register of Historical Places, the Project will have a less than significant impact on historic resources.</p>	<p>MM E-1. Should any unknown archaeological materials be encountered during the course of the project development, construction activities shall be halted in the area of discovery to allow the monitor to determine the significance of such materials. The services of a professional archaeologist shall be secured to assess and evaluate the impact upon any significant archaeological resources and make recommendations to the Planning Director. Copies of any archaeological surveys, studies or reports documenting any archaeological resources found or recovered on site shall be submitted to the South Central Coastal Information Center, California Historical Resources Information System,</p>	Less Than Significant Impact.
<p>Archeologic Resources. The Proposed Project would not cause a substantial adverse change in the significance of an archaeological or resource. There are no known recorded archaeological sites or isolates on the Project Site or within ¼ mile of the Project Site. As such, the likelihood of encountering any significant archaeological resources during the grading and excavation phase is low. However, Mitigation Measure E-1 is recommended to ensure that measures are in place to avoid or mitigate any unforeseen impacts to archaeological resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.</p>		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Interred Human Remains. The Proposed Project would not disturb any human remains. Nevertheless, a potentially significant impact could occur if the grading activities results in the accidental discovery of any unrecorded and/or unknown buried human remains, including those of Native Americans. Implementation of Mitigation Measure E-2 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to Native American remains in the unlikely event that such remains are accidentally discovered during the earthwork activities.</p>	<p>California State University, Fullerton, Department of Anthropology.</p> <p>MM E-2. In the event of the unlikely accidental discovery or recognition of any human remains during construction, the following steps should be taken: (1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: (A) The Los Angeles County Coroner is contacted to determine that no investigation of the cause of death is required, and (B) If the coroner determines the remains to be Native American the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall notify the person or persons it believes to be the most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98 and in accordance with California Health and Safety Code Section 7050.5. Excavation and/or earthwork activities may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains or cultural resources.</p>	<p>Less Than Significant Impact.</p>
<p>Paleontologic Resources. No known unique paleontologic resources or sites are recorded or known to be located on site or in the immediate project vicinity. Nevertheless, unforeseen impacts to paleontological resources may result from project implementation due to the extent of grading during the construction phases. As such, implementation of Mitigation Measure E-3 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to paleontologic resources should any such materials be accidentally discovered during the earthwork activities.</p>	<p>MM E-2. In the event of the unlikely accidental discovery or recognition of any human remains during construction, the following steps should be taken: (1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: (A) The Los Angeles County Coroner is contacted to determine that no investigation of the cause of death is required, and (B) If the coroner determines the remains to be Native American the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall notify the person or persons it believes to be the most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98 and in accordance with California Health and Safety Code Section 7050.5. Excavation and/or earthwork activities may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains or cultural resources.</p>	<p>Less Than Significant Impact.</p>
<p>Land Use Equivalency Program. All of the recommended mitigation measures to minimize impacts on cultural and archaeological resources would be applicable to the Equivalency Program, as well as the Proposed Project. Since excavation and building placement would be the same as the Proposed Project, and the mitigation measures would be the same, potential impacts on cultural and archaeological resources would be the same. Thus, with respect to cultural and archaeological resources, the implementation of the Equivalency Program would result in less than significant impacts.</p>	<p>MM E-3. If any paleontological materials are encountered during the course of the project development, the project shall be halted in the area of discovery and the services of a paleontologist shall be secured by contacting the Center for</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.</p>	
IV.F HYDROLOGY/WATER QUALITY		
<p>Hydrology/Storm Drains. The Proposed Project would include construction of a new gravity storm drainage network on-site to collect stormwater flows. Storm drain runs will be sized with sufficient hydraulic capacity to accommodate the design hydrology. The minimum size of main line conduit routes shall be 18 or 24-inches for ease of maintenance, unless otherwise approved by the District/City. These will be installed under roadways within the public right of way for ease of maintenance. This new system will be maintained and operated by City of Inglewood Department of Public Works upon completion of construction.</p>	<p>MM F-1. All waste shall be disposed of properly. Appropriately labeled recycling bins shall be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, wood, and vegetation. Non recyclable materials/wastes shall be taken to an appropriate landfill. Toxic wastes shall be discarded at a licensed regulated disposal site.</p>	<p>Less Than Significant Impact.</p>
<p>Stormwater Runoff Volumes. Mean annual runoff volumes are generally expected to increase with development. The increase is largely a result of an overall increase in percent of impervious surface area at the Project Site. This is primarily due to the fact that runoff from 50 percent the existing area is currently almost completely retained on site (e.g., captured in the existing lakes and re-used for irrigation on site). For example, the effective imperviousness of the existing Project Site is approximately 47 percent, while <u>the Proposed Project's</u> imperviousness is approximately 73 percent. <u>And, the Proposed Project with the Project Design Features (PDFs) would increase runoff by 55%.</u> Runoff volume from an area is directly proportional to the area's percent imperviousness. Proposed project design features include site design, source control, and treatment control BMPs in compliance with the SUSMP requirements in</p>	<p>MM F-2. Leaks, drips and spills shall be cleaned immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.</p> <p>MM F-3. Hosing down of pavement at material spills shall be prohibited. Dry cleanup methods shall be used whenever possible.</p> <p>MM F-4. Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or covered with tarps</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>order to reduce impacts to less than significant levels.</p>	<p>or plastic sheeting.</p>	
<p>Flooding. The Project Site is within Flood Zone C of the FEMA map, which denotes areas subject to minimal flooding and determined to be outside the 500-year plain. As a result, the Proposed Project results in a less than significant impact with respect to placing housing within a 100-year flood plain.</p>	<p>MM F-5. Gravel approaches shall be used where truck traffic is frequent to reduce soil compaction and limit the tracking of sediment into streets.</p>	<p>Less Than Significant Impact.</p>
<p><u>Seiche, Tsunami, or Mudflow. The Proposed Project would not expose people or structures to a significant risk of loss, inquiry or death involving inundation by seiche, tsunami, or mudflow. Group Delta Consultants prepared an additional study related to the potential geologic hazards of tsunami, seiche, and mudslide and the Project Site. A copy of the study is provided in Appendix O of the Final EIR.</u></p>	<p>MM F-6. All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.</p>	<p><u>Less Than Significant Impact.</u></p>
<p>Water Quality Impacts</p>	<p>MM F-7. Prior to issuance of any grading, building or B-Permit, a Stormwater Pollution Prevention Plan (SWPPP) shall be prepared for the Proposed Project. The SWPPP shall identify temporary Best Management Practices (BMPs) to be implemented in accordance with the General Construction Permit issued by the Regional Water Quality Control Board (RWQCB).</p>	
<p>Construction Impacts. Three general sources of potential short-term construction-related stormwater pollution associated with construction projects are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation via storm runoff or mechanical equipment, and subsurface activities may also impact groundwater quality through the release of construction related chemicals into the groundwater. Implementation of the BMPs in the project SWPPP and compliance with the County of Los Angeles’ discharge requirements for water entering the County’s storm drains would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments, such as, and not limited to: nutrients, heavy metals, turbidity, pesticides, and trash and debris. These measures would ensure that the project construction would not violate any water quality standards or discharge requirements or otherwise substantially degrade water quality.</p>		<p>Less Than Significant Impact.</p>
<p>Dewatering. Construction on the Project Site may require dewatering and non-stormwater related discharges. For example, dewatering may be</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>necessary for the construction of the lake features, if perched groundwater is encountered during grading, or to allow discharges associated with testing of water lines, sprinkler systems and other facilities. In general, the General Construction Permit authorizes construction dewatering activities and other construction related non-stormwater discharges as long as they (a) comply with Section A.9 of the General Permit; (b) do not cause or contribute to violation of any water quality standards, (c) do not violate any other provisions of the General Permit, (d) do not require a non-stormwater permit as issued by some RWQCBs, and (e) are not prohibited by a Basin Plan provision. Full compliance with applicable local, state and federal water quality standards by the Applicant would assure that potential impacts from dewatering discharges are less than significant.</p>		
<p>Pesticides. There are no known pesticide contaminated soils onsite. Nonetheless, disturbance and/or transport of potential pesticides adsorbed to existing site sediments may be a concern during the construction phase. The Construction SWPPP would contain sediment and erosion control BMPs pursuant to the General Construction Permit, and those BMPs would effectively control erosion and the discharge of sediment along with other pollutants per the BAT/BCT standards.</p>		Less Than Significant Impact.
<p>Hydrocarbons. During the construction phase of the Proposed Project, hydrocarbons in site runoff could result from construction equipment/vehicle fueling or spills. However, pursuant to the General Construction Permit, the Construction SWPPP must include BMPs that address proper handling of petroleum products on the construction site, and those BMPs must effectively prevent the release of hydrocarbons to runoff per the BAT/BCT standards. Polycyclic Aromatic Hydrocarbon (PAH) that is adsorbed to sediment during the construction phase would be effectively controlled via the erosion and sediment control BMPs.</p>		Less Than Significant Impact.
<p>Trash and Debris. During the construction phase of the Proposed Project, there is potential for an increase in trash and debris loads at the Project Site. The SWPPP for the site will include BMPs for trash control. Compliance with the Permit Requirements and inclusion of these BMPs,</p>		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
meeting BAT/BCT, in the SWPPP will mitigate impacts from trash and debris to a level less than significant.		
<p>Turbidity. The Construction SWPPP must contain sediment and erosion control BMPs that effectively control erosion and discharge of sediment, along with other pollutants. Additionally, fertilizer control, non-visible pollutant monitoring and trash control BMPs will help control turbidity during construction. If the proposed PDFs and construction-related controls are implemented, runoff discharges from the Proposed Project would not cause increases in turbidity and the water quality impacts related to turbidity during construction are considered less than significant.</p>		Less Than Significant Impact.
<p>Operational Impacts.</p>		
<p>Modeled Pollutants of Concern – Total Suspended Solids (TSS). The predicted TSS concentration is well below the average values observed in Dominguez Channel. Based on the comprehensive site design, source control, and treatment control strategy, and the comparison with available in-stream data and Basin Plan benchmark objectives, the TSS in stormwater runoff from the Proposed Project will not cause a nuisance or adversely affect beneficial uses in the receiving waters. Potential impacts associated with TSS are considered less than significant.</p>		Less Than Significant Impact.
<p>Modeled Pollutants of Concern – Total Phosphorous (TP). TP load is predicted to increase slightly and TP concentration is predicted to decrease slightly post-construction as compared to existing conditions. Based on the comprehensive site design, source control, and treatment control strategy and the comparison with available in-stream monitoring data and Basin Plan benchmark objectives, potential impacts associated with TP are considered less than significant.</p>		Less Than Significant Impact.
<p>Modeled Pollutants of Concern – Nitrogen Compounds. The average annual stormwater concentration of ammonia is predicted to be considerably less than the Basin Plan objective, and within the low end of the range of observed concentrations in Dominguez Channel. Likewise, the average annual stormwater concentration of nitrate-N plus nitrite-N is</p>	Less Than Significant Impact.	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>predicted to be considerably less than the Basin Plan WQO and below the range of observed concentrations for Dominguez Channel. Thus, the Proposed Project’s impacts associated with nitrogen compounds are considered less than significant.</p>		
<p>Modeled Pollutants of Concern – Metals. Copper, lead, and zinc are the most prevalent metals typically found in urban runoff. Although runoff volumes will increase with the Proposed Project, the change in land use with the planned level of treatment are predicted to decrease the runoff concentrations for all three trace metals. The Proposed Project would include site design, source control, and treatment control BMPs in compliance with the SUSMP requirements. Based on the comprehensive site design, source control, and treatment strategy and the comparison with the in stream water quality monitoring data and benchmark California Toxic Rule values, the Proposed Project’s potential impacts associated with trace metals are considered less than significant.</p>		Less Than Significant Impact.
<p>Non-Modeled Pollutants of Concern – Turbidity. Discharges of turbid runoff are primarily of concern during the construction phase of development. Based upon the implementation of the PDFs and construction-related controls, runoff discharges from the Proposed Project would not cause increases in turbidity that could result in adverse affects to beneficial uses in the receiving waters and the water quality impacts related to turbidity are considered less than significant.</p>		Less Than Significant Impact.
<p>Non-Modeled Pollutants of Concern – Pesticides. Pesticides would be applied to common landscaped areas and residential lawns and gardens during operation of the Proposed Project. Based on the incorporation of site design, source control, and treatment control BMPs pursuant to SUSMP requirements and the use of an Integrated Pest Management program, potential operational Project impacts associated with pesticides are considered less than significant.</p>		Less Than Significant Impact.
<p>Non-Modeled Pollutants of Concern – Pathogens. The primary sources of fecal coliform from the Proposed Project would likely be sediment, pet wastes, wildlife, and regrowth in the storm drain itself. With the incorporation of proposed PDFs, the Proposed Project would not result in</p>		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>appreciable changes in pathogen levels in the receiving waters compared to existing conditions, and potential water quality impacts related to pathogens are considered less than significant.</p>		
<p>Non-Modeled Pollutants of Concern – Hydrocarbons. Although the concentration of hydrocarbons in runoff is expected to increase slightly with the Proposed Project due to the increase in roadways, driveways, parking areas, and vehicle use, the proposed PDFs are expected to prevent appreciable increases in hydrocarbon concentrations from leaving the Project Site. The effect of the Proposed Project on petroleum hydrocarbon levels in the receiving waters is considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Non-Modeled Pollutants of Concern – Trash and debris. Urbanization can significantly increase trash and debris loads, which can impose an oxygen demand on a water body as organic matter decomposes. The proposed PDFs include both source control and treatment BMPs that will remove or prevent the release of floating materials, including solids, liquids, foam, or scum, from runoff discharges and will prevent impacts on dissolved oxygen in the receiving water due to decomposing debris. Therefore, water quality impacts related to trash and debris are considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Non-Modeled Pollutants of Concern – Methylene Blue Activated Substances (MBAS). MBAS, which is related to the presence of detergents in runoff, may be incidentally associated with urban development due to commercial and/or residential vehicle washing or other outdoor washing activities. The presence of soap in runoff from the Proposed Project will be controlled through the source control PDFs, including a public education program on residential and charity car washing, and the provision of a car wash pad connected to sanitary sewer in the multi-family residential areas. Therefore, potential water quality impacts related to MBAS are considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Bioaccumulation. The potential for bioaccumulation impacts from the lake and proposed vegetated BMPs will be minimal because the Project Site is largely impervious with very little coarse solids and associated</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>pollutants expected to be generated. The potential for bioaccumulation and adverse effects on waterfowl and other species is considered less than significant.</p>		
<p>Dry Weather Runoff. Pollutants in dry weather flows could also be of concern because dry weather flow conditions occur throughout a large majority of the year. The Proposed Project will be a new development with new storm drains and sanitary sewer systems, which are expected to have minimal, if any, leakage. Based on source control PDFs reducing the amount of dry weather runoff and treatment control PDFs capturing and treating the dry weather runoff that may occur, the potential impact from dry weather flows is considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Direct Groundwater Quality Impacts. Discharge from the Project's developed areas to groundwater will occur through general infiltration of irrigation water and through incidental infiltration of urban runoff in the proposed treatment control PDFs after treatment. Since the historical shallow ground water level at the site is deeper than 50 feet, impacts to groundwater caused by infiltration of irrigation water and treated urban runoff is considered less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Water Quality Impacts and Safety Concerns from the Hollywood Park Lake.</p>		
<p>Mosquitoes in Manmade Lakes and Water Features. The Hollywood Park lake will be constructed with several design features specifically designed to limit the available habitat for mosquito breeding. The lake will provide very little suitable habitat for mosquito larvae and will support healthy populations of mosquito predators, and very few mosquitoes will successfully breed in the lake.</p>		<p>Less Than Significant Impact.</p>
<p>Other Vectors and Nuisance Animals. Several other types of potential disease vectors are often associated with lakes (such as rats, muskrats, other insects, midges and crane flies), although this association is not typically rooted in fact. Although some of these vectors can live near lakes, they can also live throughout landscaped residential areas, and the lake should not be considered an attractor for such vectors. Therefore,</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
these vectors will cause a less than significant impact.		
Shoreline Safety. The safety of the public is a primary concern of lake designers, and the lake at Hollywood Park will be designed to provide a safe shoreline environment. The overall effect of the safety edge of the shoreline is to provide a situation in which nobody can accidentally find themselves in deep water.		Less Than Significant Impact.
Fecal Coliform Bacteria. A lake has many potential sources of fecal coliform bacteria, including storm drains, runoff directly into the lake, and wildlife that will be attracted to the lake. However, the lake will serve as an excellent BMP for removing fecal coliform and other bacteria from stormwater, and the lake will not serve as a significant source of indicator bacteria or pathogens to the receiving water. Thus the lake will significantly reduce the discharge of bacteria and pathogens from the site as compared to typical urban developments.		Less Than Significant Impact.
Pathogenic Organisms. Pathogenic organisms will be present in very low concentrations in the lake at Hollywood Park as indicated by the low levels of fecal coliform bacteria present in lakes of similar construction. Because pathogens will be present in such low concentrations, this impact is considered less than significant.		Less Than Significant Impact.
Inadvertent Body Contact. The lake at Hollywood Park will not be designed for swimming, boating, or other contact recreation, but inadvertent human contact with the water may still occur. The lake at Hollywood Park will, most of the time, meet higher standards than are required. Therefore the lake should be considered quite safe for any inadvertent or accidental contact that may occur.		Less Than Significant Impact.
Offensive Odors. Offensive or unpleasant odors will not be present at the lake because it will have excellent water quality at all times and will be well aerated. Therefore impacts will be less than significant.		Less Than Significant Impact.
Groundwater Contamination. The lake will be constructed with a synthetic membrane liner that will be continuous beneath the entire lake and will prevent any mixing of lake water with groundwater. As such, impacts will be less than significant.		Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Water Quality Treatment. The lake at Hollywood Park will serve as a treatment facility for stormwater on the Project Site. The lake will be designed with several types of water quality systems to ensure that stormwater entering the lake is treated to a very high level before discharge, and that water residing in the lake is continuously treated to maintain excellent water quality in the lake.</p>		Less Than Significant Impact.
<p>Land Use Equivalency Program. Potential changes in land use under the program would have not substantial effect on the predicted loads and concentrations, BMPs, or groundwater use and their associated impacts, because only the use is changing. All mitigation measures to minimize water quality impacts under the Proposed Project would be implemented, and hydrology and water quality impacts would remain less than significant, as with the Proposed Project.</p>		Less Than Significant Impact.
<p>IV.G NOISE</p>		
<p>Construction –Related Noise Impacts</p>		
<p>Construction Noise. Construction of the proposed project would result in temporary increases in ambient noise levels in the project area on an intermittent basis. Construction-related noise levels at sensitive receptors nearest to the Project Site would exceed the five dBA significance threshold. However, even with implementation of mitigation measures, construction activity would exceed the 5 dBA threshold and result in a significant impact. The City has not adopted specific construction noise level standards or limitations. Instead, the City regulates construction noise by limiting activity to the hours identified in the Noise Ordinance. Construction activity associated with the project would comply with the standards established in the Noise Ordinance.</p>	<p>MM G-1. All construction equipment shall be equipped with mufflers and other suitable noise attenuation devices.</p> <p>MM G-2. As feasible, grading and construction contractors shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment).</p> <p>MM G-3. As feasible, equipment staging areas shall be located away from sensitive receptors.</p>	Significant and Unavoidable Impact.
<p>Construction Vibration. The Project would involve the use of heavy equipment capable of generating vibration levels of 0.089 PPV at a distance of 25 feet. Vibration levels at nearby sensitive receptors would not exceed the potential building damage threshold of 0.5 PPV. As such, the Proposed Project would result in a less-than-significant vibration impact.</p>	<p>MM G-4. A perimeter wall is already present between the project site and the residential development to the east (Renaissance). The Project Applicant shall not remove this wall.</p> <p>MM G-5. All residential units located within 500 feet of the</p>	Less Than Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>construction site shall be sent a notice regarding the construction schedule of the proposed project. A sign, legible at a distance of 50 feet, shall also be posted at high visibility areas on the construction site. All notices and signs shall indicate the dates and duration of construction activities, as well as a telephone number where residents can inquire about the construction process and register complaints.</p> <p>MM G-6. A “noise disturbance coordinator” shall be established. The disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and use reasonable measures to mitigate the problem, if feasible. All notices that are sent to residential units within 500 feet of the construction site and all signs posted at the construction site shall list the telephone number for the disturbance coordinator.</p>	
<p>Operational Noise Impacts</p>		
<p>Mobile Noise - Weekday. The predominant noise source for the proposed project is vehicular traffic. The Proposed Project would result in a slight reduction in noise levels along all but one analyzed segment on weekdays; Arbor Vitae Street between La Brea Avenue and Prairie Avenue would not change future noise levels. This reduction can be attributed to the removal of the existing racetrack, which currently attracts</p>	<p>See Mitigation Measure I-1 in Section IV. I. Land Use for</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>a daily average of 10,000 patrons. Accordingly, the proposed project would result in a beneficial impact on the ambient noise environment as it would slightly reduce noise levels in the project area.</p>	<p>an additional mitigation measure related to airport noise impacts.</p>	
<p>Mobile Noise - Weekend. The Proposed Project would result in a slight increase (i.e., an increase of 0.8 dBA or less) in noise levels along six of the ten analyzed roadway segments on weekends, a slight reduction in noise levels along two of the analyzed segments and no change along the remaining two segments. Mobile noise levels attributed to the proposed project would not increase by three decibels (CNEL) to or within the “normally unacceptable” or “clearly unacceptable” category or result in a five-decibel or more increase in noise level. As such, the proposed project would result in a less-than-significant impact on the ambient noise environment.</p>		<p>Less Than Significant Impact.</p>
<p>Mechanical Equipment Noise. Potential stationary noise sources related to the long-term operations of the proposed project include mechanical equipment and parking areas. Mechanical equipment could generate noise levels that are audible at both on- and off-site noise sensitive locations. However, equipment would generally be located within enclosures or behind new buildings or otherwise shielded from the nearby sensitive land uses. In addition to this physical shielding, proper engineering during the detailed design phases would ensure that the noise generated by mechanical equipment operations will meet Inglewood Municipal Code noise standards. As such, mechanical equipment would result a less-than-significant noise impact.</p>		<p>Less Than Significant Impact.</p>
<p>Parking Noise. Proposed Project parking activity along Prairie Avenue and Century Boulevard would potentially expose off-site sensitive receptors to unacceptable levels of parking noise. As compared to the ambient noise level along these roadways, however, the ambient noise level increase at sensitive receptors along Prairie Avenue and Century Boulevard would be less than one dBA and would not be audible. In addition, the majority of project parking would be located internal to the project site and away from sensitive receptors. As such, parking noise would result in a less-than-significant impact.</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Truck Noise. The noise produced by delivery and trash pick-up trucks at the Project Site will be a potential source of annoyance. The noise level associated with a trash or delivery truck would generally average approximately 88 dBA. These sources of noise are typical in an urban environment and would be considered less-than-significant.</p>		<p>Less Than Significant Impact.</p>
<p>On-Site Noise Exposure. New sensitive receptors located on the southern portion of the Project Site would potentially be exposed to high noise levels from project-related commercial activity and recreational activity from the casino. Specifically, proposed residential units that abut the proposed retail uses along Century Boulevard would potentially experience increased noise from various retail noise sources. Portions of the project site are within the 65 dBA CNEL noise contour for LAX. The portions of the project site located within the 65 dBA CNEL noise contour would potentially include residential and mixed-use land uses. As such, new sensitive land uses may potentially be exposed to interior noise levels that exceed the recommended 45 dBA CNEL. Therefore, mitigation is proposed to reduce potentially significant aircraft noise.</p>	<p>MM G-7. All residential units shall be designed to minimize noise effects from non-residential activities on the project site, including the casino, parking areas, loading zones, alarms from trucks in reverse and commercial uses with exterior components (e.g., outdoor dining, special entertainment events, etc.). These design measures shall be established to maintain noise levels at interior spaces to be within the 45 dBA noise standards. Measures shall include, but not be limited to, using construction techniques/materials with an STC rating of 40 in habitable rooms/areas, the use of perimeter walls, sound-rated interior walls between uses, or other site planning and building placement that could reduce or eliminate the light of sight between the noise source and residential units. Prior to the issuance of building permits, the Project Applicant shall utilize an acoustical engineer to demonstrate to the City of Inglewood that the 45 dBA interior noise standard has been achieved at residential dwelling units.</p>	<p>Less Than Significant Impact.</p>
<p>Vibration. The proposed project would not include significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the project vicinity would be generated by vehicular travel on the local roadways. Operational vibration would result in a less-than-significant impact.</p>		<p>Less Than Significant Impact.</p>
<p>Land Use Equivalency Program. The construction impacts of the Equivalency Program construction noise levels would be the same as forecasted for the Proposed Project. Therefore, significant and unavoidable impacts with regard to the construction phase will occur.</p>		<p>Significant Unavoidable Impact with respect to Construction.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
Operational impacts would be similar to the operational impacts of the Proposed Project. All recommended mitigation measures to minimized noise impacts will be implemented, and impacts with respect to operations will remain less than significant.		Less Than Significant Impact with respect to Operation.
IV.H POPULATION, HOUSING, AND EMPLOYMENT		
<p>Construction Impacts. The Proposed Project would generate over 17,105 construction-related jobs over the 10-year buildout and stabilization horizon of the Proposed Project, including approximately 9,203 direct jobs, 3,274 indirect jobs, and 4,628 induced jobs. Employment opportunities associated with construction of the Proposed Project would not result in any measurable relocation of construction worker households to the vicinity of the Project Site. Indirect impacts upon regional population and housing conditions would therefore be less than significant.</p>	No mitigation measures are required. Although plan consistency impacts with regional growth projections have been identified, no mitigation measures are proposed. This is because the impact is viewed as being technical in nature. In fact, adding housing to a jobs-rich area is considered a positive benefit, and consistent with the spirit and intent of the growth policies. As noted, the current population and existing number of residential units currently in the City are also inconsistent with existing growth projections.	Less Than Significant Impact.
<p>Operational Employment Displacement Impacts. The Proposed Project would eliminate horse racing at the Hollywood Park Racetrack. In the broader context of the horse racing industry in California, horseracing is a declining business industry largely due to increased competition for the publics' recreation and entertainment dollars. The decline in simulcast revenues at Hollywood Park when there is no live racing is further evidence of the decline in the horse racing industry. In analyzing displacement impacts, Seasonal/Part Time employees and Casual Laborers at the racetrack have been included as potentially lost jobs when the existing facility closes. However, in reality many of these Seasonal/Part Time jobs and all of these Casual Laborer jobs do not represent actual lost jobs on a regional basis because they have historically moved with the racing dates to other venues (for example Santa Anita and Del Mar) and will continue to move to new venues if Hollywood Park's racing dates are moved to other local tracks. Additionally, the Proposed Project creates 517 net new jobs. Overall, displacement impacts are less than significant.</p>		Less Than Significant Impact.
<p>Indirect Employment Growth. The increase in on-site employment</p>		Less Than Significant

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>generated by the commercial uses of the Project would generate indirect population and housing growth if households relocate from communities outside the southern California region to be closer to their place of employment. Employment opportunities typically associated with commercial office, hotel and retail/entertainment uses would not likely result in substantial permanent population growth or associated housing demands. Rather, by introducing housing in a jobs-rich area, the Project is expected to bring balance. Indirect impacts to population and housing demographics generated by the commercial uses of the Project would be less than significant.</p>		Impact.
<p>Direct Employment Growth. The proposed commercial office, retail/entertainment, casino/gaming, hotel and residential land uses are estimated to generate approximately 3,135 jobs, including the retention of approximately 1,017 existing Casino-related jobs. When compared to the displacement of the 2,185 existing jobs (1,601 full-time equivalent jobs) associated with the current horseracing operations on the property, the Proposed Project would result in a net increase of 517 jobs. The Project’s anticipated employment generation of 517 net new jobs (FTE) would be consistent with local employment forecasts and would thus be considered less than significant.</p>		Less Than Significant Impact.
<p>Housing Growth Impacts. The Proposed Project will create approximately 2,995 new residential dwelling units, resulting in approximately 8,985 new permanent residents. The Proposed Project’s housing and population growth is technically inconsistent with the RTP growth forecasts for the city. However, Inglewood is a jobs-rich area, and new housing would bring balance to the area. Despite this technical inconsistency, the Proposed Project nonetheless presents an opportunity to address the housing needs of the City and the surrounding region given the City’s proximity to the South Bay and the Westside jobs markets, which are jobs-rich. Additionally, the Proposed Project’s creation of 2,995 newly-constructed dwelling units presents an opportunity for the City to continue its efforts to add high-quality, new housing to its housing stock. Nonetheless, impacts upon population and housing growth would be considered a significant impact due to the technical inconsistency with</p>		Significant Impact.

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
growth forecasts.		
<p>Population Growth Impacts. Based on SCAG’s 2008 population projections, the City of Inglewood is anticipated to experience a population increase of 2,396 persons between the years of 2005 and 2015. The Proposed Project would add approximately 8,985 persons by 2014. Therefore, the population growth generated by the Proposed Project would not be consistent with the regional growth projections. However, with implementation of the proposed Project Design Features and recommended mitigation measures, the existing local and regional infrastructure can accommodate the unanticipated growth of the project. Still, due to the Proposed Project’s technical inconsistency with the population growth projections for the City, impacts to population growth would be considered a significant impact.</p>		Significant Impact.
<p>Land Use Equivalency Program. The Equivalency Program does not fundamentally alter the Project’s land use mix and thus, would not have a noticeable change in the policy analyses presented above. The Equivalency Program would have a less than significant impact relative to displacement of people and housing, impacts upon regional population and housing related to temporary construction jobs, indirect impacts to population and housing demographics generated by the new residential, commercial office, retail and hotel uses of the Proposed Project. The Equivalency Program, like the Proposed Project, is consistent with the City of Inglewood’s local community housing goals and policies, the Redevelopment Agency’s goals and policies, the RCPG and the RHNA. However, implementation of the proposed Equivalency Program would alter the Project’s relationship with adopted local growth forecasts and its employment generation, since the number of dwelling units could vary between 2,995 and 3,500 with a corresponding adjustment to commercial, office, or hotel use.</p>		<p>Less Than Significant Impact with respect to employment generation.</p> <p>Significant Impact with respect to population and housing growth forecasts.</p>
<p>IV.I LAND USE & PLANNING</p>		
<p>Land Use Compatibility. The residential, retail, and commercial office, hotel, civic, open space and casino/gaming uses that are proposed within the Hollywood Park Redevelopment Project are substantially consistent</p>	<p>MM I-1. Proposed residential uses, including those that fall within the Airport Influence Area’s 65 dBA CNEL contour, shall be developed in a manner that achieves a 45 dBA interior</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>with the surrounding land uses. The Proposed Project, however, through the adoption of a Specific Plan and a change in the zoning standards, will provide a comprehensive land use plan to establish specific land use zones and development standards to provide a vibrant mixed-use environment. The planned uses would be more compatible than the existing recreational use that currently occupies the Project Site, as the scale and massing of the structures within the planned development would be consistent with the low to mid-rise commercial and residential structures that exist in the immediate area. Land use compatibility impacts would therefore be less than significant.</p>	<p>noise level. A qualified noise consultant shall complete an exterior to interior noise analysis during the ministerial building permit stage in conformance with the California Building Code, Title 24, Section 1207 to ensure that interior noise levels are at or below 45 dBA CNEL.</p>	
<p>Consistency with Regional Land Use Policies and Regulations. The Proposed Project would be consistent with the applicable policies and goals of SCAG’s Regional Comprehensive Plan and Guide; SCAG’s Growth Visioning Goals; the RWQCB’s National Pollution Discharge Elimination System requirements; the Los Angeles County’s Congestion Management Plan, and would be constructed in a manner that complies with the Airport Land Use Plan. <u>In addition, Table IV.I-2.B, SCAG Compass Growth Vision Principles, has been added to the Final EIR to show a point by point consistency analysis of the Proposed Project and SCAG’s Compass Growth Vision.</u> Therefore, impacts related to consistency with applicable regional Plans would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>City of Inglewood General Plan. The Project would not be consistent with the current General Plan land use designation. The Project would involve a request for a General Plan Amendment and adoption of a Specific Plan to bring the proposed project into conformance with the General Plan. <u>In addition, Table IV.I-2.C has been added to the Final EIR as a point by point consistency analysis of the Proposed Project and the General Plan Land Use Element.</u> With adoption of the proposed General Plan Amendment and Specific Plan, land use impacts would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Specific Plan. The Hollywood Park Redevelopment Project would involve adoption of the Hollywood Park Specific Plan (the “Specific Plan”) to facilitate the planned development of a mixed-use master</p>		<p>Less Than Significant Impact.</p>

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

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

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

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

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

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
than significant.		
<p>Solid Waste – Operational Impacts. Operation of the Proposed Project would cause an on-going generation of solid waste throughout the lifespan of the Project. Upon full occupancy, the Proposed Project’s residential and commercial uses would generate approximately 42,461 <u>11,861</u> net pounds (6-2-5.9 tons) of solid waste per day, or approximately 2,263 <u>2,165</u> tons per year. Because the Proposed Project would generate additional solid waste throughout the life of the project and beyond the expected life of the landfills serving the Project Site, operational solid waste impacts would be considered significant and unavoidable.</p>	<p>Aside from the Project Design Features to minimize solid waste impacts, no additional feasible mitigation measures have been identified.</p>	<p>Significant Unavoidable Impact.</p>
<p>Land Use Equivalency Program. Potential changes in land use under the Equivalency Program would have no substantial effect on public utilities because only the intensity of use of the land is slightly changing. Therefore, the impacts with regard to water, sewer, energy conservation, and solid waste – construction would remain less than significant, and solid waste – operational impacts would remain significant and unavoidable.</p>	<p>Aside from the Project Design Features to minimize solid waste impacts, no additional feasible mitigation measures have been identified.</p>	<p>Less Than Significant Impact. Significant and Unavoidable Impacts with respect to solid waste operations.</p>
<p>IV.K PUBLIC SERVICES</p>		
<p>Police - Construction Impacts. Construction sites can be sources of nuisances, providing hazards and inviting theft and vandalism. As such, the Proposed Project would employ mitigation measures including erecting temporary fencing around the construction site to discourage trespassers and deploying roving security guards to monitor the construction site and deter any potential criminal activity. These mitigation measures would diminish the need for police services during construction of the Proposed Project and reduce the potentially significant impact to less-than-significant. Access and circulation to the Project Site and on roadways surrounding the construction site could be adversely affected by construction activities such as delivery schedules, temporary road/lane closures for utility upgrades in the right-of-way. Construction activities are not anticipated to result in any temporary lane closures on streets adjacent to the Project Site, which would have the potential to reduce emergency response times in the surrounding area. A Construction</p>	<p>MM K.1-1. Prior to construction the Applicant shall prepare a Construction Security and Safety Management Plan that provides for the following safety features to be implemented and maintained throughout the construction period:</p> <ul style="list-style-type: none"> (a) The Project Contractor(s) shall erect temporary fencing around the Project Site during construction activities to secure the Project Site and discourage trespassers. (b) The Project Contractor(s) shall employ security lighting to deter any potential criminal activity. Construction materials should not be accessible to the public during 	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Traffic Control/Management Plan would be developed to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. Implementation of this mitigation measure would serve to reduce any potential construction traffic impacts to a less-than-significant level.</p> <p>As part of the Proposed Project, a police substation operated by the IPD and an on-site security plan would be conceived and implemented by the Applicant in consultation with the IPD to minimize the potential for on-site crime and reduce demands upon additional IPD services. Impacts upon Police Services would thus be less than significant.</p>	<p>non-construction hours.</p> <p>(c) Detour or other signs should be clearly marked, positioned and secured.</p> <p>(d) All open hazardous areas, such as trenches, must be secured.</p> <p>(e) All discarded debris should be secured during construction.</p> <p>(f) A private security service shall patrol the site during non-construction hours.</p> <p>MM K.1-2. Prior to construction, the Applicant shall prepare a Construction Traffic Control/Management Plan to minimize the effects of construction on vehicular and pedestrian circulation in the area of the Project Site.</p>	<p>Less Than Significant Impact.</p>
<p>Police - Operational Impacts. The Proposed Project would introduce a net increase of approximately 8,985 new residents to the Project Site. Based on the current officer-to-inhabitant ratio that the IPD maintains (i.e., 1.6 officers per 1,000 inhabitants), the Proposed Project would generate a need for 14 new police officers. As compared to the number of sworn officers that are currently authorized for the IPD (i.e., 1.8 officers per 1,000 inhabitants), the project would generate a demand for 16 new police officers. The number of calls requesting police responses to home and retail burglaries, vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons would be anticipated to increase somewhat with the increase in onsite activity and traffic in the surrounding area. It is anticipated that the demand for the additional staffing of 14 to 16 new police officers would be met through the increase</p>	<p>MM K.1-3. The Project Applicant shall file all building plans with the Inglewood Police Department. Plans shall include access routes, floor plans, and any other additional information that might facilitate prompt and efficient police response.</p> <p>MM K.1-4. The Project Applicant shall install alarms and or/locked doors on doorways providing public access to commercial facilities.</p> <p>MM K.1-5. The Project Applicant shall develop and implement a Security Plan in consultation with the IPD, outlining the</p>	<p>Less Than Significant Impact.</p>

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

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

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

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

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

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>vandalism and graffiti.</p> <ul style="list-style-type: none"> • Avoid of loose rocks in landscaping. <p>MM K.1-6. The Project Applicant shall implement an on-site security plan in consultation with the Inglewood Police Department to provide a safe and secure environment within the proposed parks. The parks shall be designed and constructed in a manner that eliminates dead spaces and concealed areas to the maximum extent feasible. Low-level directional security lighting shall be provided to increase visibility for security personnel and passers by.</p>	
<p>Fire Protection – Construction Impacts. Removal of the existing onsite buildings and construction of the Proposed Project could increase the potential for accidental on-site fires from such sources as the operation of mechanical equipment, the use of flammable construction materials, and the careless disposal of cigarettes. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations.</p> <p>Project construction would not be expected to impact fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LACoFD. Therefore, construction-related impacts to fire protection services would be less than significant.</p>	<p>MM K.2-1 Throughout the demolition and construction process, Fire Department access shall remain clear and unobstructed at all times.</p> <p>MM K.2-2 All Project Contractors shall implement good housekeeping procedures during demolition and construction of the Proposed Project, including maintaining mechanical equipment in good operating condition; proper storage of flammable materials in appropriate containers; and the immediate and complete cleanup of spills of flammable materials when they occur.</p>	<p>Less Than Significant Impact.</p>
<p>Fire Protection – Operational Impacts. Implementation of the Project would increase the need for fire protection and emergency medical services. Emergency vehicle access to the Proposed Project Site would</p>	<p>MM K.2-3 The Proposed Project shall comply with all applicable code and ordinance requirements for construction, access, water mains, fire flow and hydrants. Specific fire and life safety</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>continue to be provided from local public roadways. The adequacy of fire protection for a given area is based on required fire flow, response time from existing fire stations and the LACoFD’s judgment for assessing the needs in a given area. The Project Site is adequately served by the existing water infrastructure and would be designed and developed to ensure adequate fire flow is maintained through buildout of the Proposed Project. Additional hydrants would be installed throughout the development per Fire Code requirements based upon the specific land uses to be introduced (i.e., multi-family residential, commercial, and parking uses). As such, impacts related to fire flow are anticipated to be less than significant.</p>	<p>requirements for the construction phase will be addressed at the building fire plan check at Plot Plan Review.</p> <p>MM K.2-4 Final fire flows shall be determined by the Los Angeles County Fire Department. Fire flow of up to 5,000 gallons per minute (gpm) at 20 pounds per square inch residual pressure for a five-hour duration may be required or as determined based on building size, building relationships, proximity to property lines and types of construction.</p> <p>MM K.2-5 Fire hydrant spacing shall be 300 feet and shall meet the following requirements:</p>	
<p>Fire Protection – Land Use Equivalency Program Impacts. Under the Equivalency Program, there would be no substantial variation in the Project’s Circulation Plan. There would be no changes in building locations or site accessibility features. Development would be served by the same infrastructure and facilities as the Proposed Project. Construction-related, distance and emergency access and fire flow impacts would remain roughly the same as with the Proposed Project. These impacts would remain less than significant.</p> <p>In three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in population and the Maximum Office/Commercial scenario where there is a net increase in employment, the application of the Equivalency Program may generate higher demand for fire projection services than the Proposed Project.</p> <p>All of the recommended project design features and mitigation measures to minimize impacts on fire protection would be applicable to the Equivalency Program, as well as the Proposed Project. Like the Proposed Project, none of the Equivalency Scenarios would require the expansion, consolidation or relocation of an existing facility to maintain service. As such, impacts to fire protection services under the Equivalency Program would be less than significant.</p>	<p>1. No portion of the lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.</p> <p>2. No portion of the building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.</p> <p>MM K.2-6 Internal driveways and roadways shall be no less than 26 feet and shall contain an approved turning radii of no less than 32 feet, or as approved by the Los Angeles County Fire Department.</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Schools – Construction Impacts. Construction activities have the potential to generate adverse impacts associated with respect to air quality, noise, traffic and public safety. The Proposed Project site is within approximately ¼ mile (1,300 feet) of eight institutional sensitive receptors. The Proposed Project’s construction-related activities would generate significant and unmitigatable regional and localized air quality impacts which would adversely impact all eight sensitive air quality receptors. Construction related noise levels, even with mitigation, would exceed the five dBA significance threshold, and as such would result in a temporary significant construction noise impact at the sensitive receptors closest to the Project Site. Construction of the Proposed Project would also require the transport and use of heavy equipment, haul trucks, and generate other construction related traffic that could affect school pedestrian routes and or drop-off and pick-up routes. In addition to the above, construction sites have the potential to attract and endanger school aged kids if the site is not adequately secured and monitored to prevent trespassers. Implementation of precautionary mitigation measures would ensure that any potential impacts to student safety would be minimized to a less than significant level. Therefore, the Proposed Project (with exception of the significant and unavoidable air quality impacts from construction and operation, and the temporary construction noise impacts) would result in a less than significant impact upon public school sites.</p>	<p>MM K 3-1. Prior to the start of project demolition, the Project Applicant shall prepare a Construction Management Plan approved by the Planning Department to ensure construction impacts to nearby school sites are minimized to the maximum extent feasible. The Construction Management Plan shall include the following:</p> <ul style="list-style-type: none"> a. Project contractors shall maintain safe and convenient pedestrian routes to IUSD schools at all times. If necessary, the Project Contractor shall provide for crossing guards when safety of students may be compromised by construction-related activities at impacted school crossings. b. The Project Contractor shall maintain ongoing communication with school administration staff at affected schools, and shall provide sufficient notice to forewarn students and parents/guardians when existing pedestrian and vehicle routes to school may be impacted. c. Staging or parking of construction-related vehicles, including worker-transport vehicles, shall not be allowed adjacent to school sites during school operating hours. d. The Project Contractor shall install barriers and/or fencing to secure construction equipment and site to prevent trespassing, vandalism, and attractive 	<p>Less Than Significant Impact.</p> <p>Significant Unavoidable Impact with respect to Noise and Air Quality.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	nuisances.	
<p>Schools – Operational Impacts. The Project Site has no existing residential uses and therefore does not currently generate any students. The Project would result in the generation of 574 students, including 279 elementary students, 137 middle school students, and 159 high school students. A four-acre site is proposed to be made available for civic uses, which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility. While this project feature could be set aside for the development of a new school site, the Developer would be responsible for the mandatory payment of school fees in conformance with SB 50, to mitigate the Project’s impact on schools. In accordance with SB 50, payment of school fees is deemed to provide full and complete mitigation to impacts upon school capacity.</p>	<p>MM K 3-2. Pursuant to Government Code Section 65995, the Applicant shall pay the developer fees at the time building permits are issued; payment of the adopted fees would provide full and complete mitigation of school impacts. Alternatively, the Applicant may enter into a school finance agreement (Agreement) with the appropriate school district to address mitigation to school impacts in lieu of payment of developer fees. The Agreement shall be mutually satisfying and shall establish financing mechanisms for funding facilities to serve the students from the Project. If the Applicant and affected school district do not reach a mutually satisfying agreement, then project impacts would be subject to developer fees.</p>	<p>Less Than Significant Impact.</p>
<p>Schools – Land Use Equivalency Program Impacts. The exchange of land uses between retail/commercial/office/hotel to residential would alter the site uses and site population, which would result in an increase in public school students generated by the Equivalency Program. Therefore, in three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in total number of units and the population, the application of the Equivalency Program may generate higher demand for school services than compared to the Proposed Project. All of the recommended project design features and mitigation measures under the Proposed Project to minimize potential impacts on school services would be applicable to the Equivalency Program, and impacts would be reduced to a less than significant level.</p>		<p>Less Than Significant Impact.</p>
<p>Parks and Recreation. Based on the City General Plan Open Space and Parks Element goal of providing 1 acre of parks and open space per 1,000 residents, the Proposed Project would generate a need for approximately 9 acres of public parkland in the project area (e.g., 8985 x 1/1,000). The Proposed Project would fulfill the park and recreational needs of its residents by providing 25 acres of open space on the Project Site, which</p>	<p>MM K 4-1. For those areas that are proposed for general public access, the park and open space areas shall be maintained by the home owners associations with public access during daylight hours only.</p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>equates to approximately 2.8 acres per 1,000 people. As the Proposed project would provide more than enough open space to meet the parks and recreation needs of the planned development, impacts upon the public parks and recreation system would be less than significant.</p>		
<p>Parks and Recreation – Land Use Equivalency Program Impacts. Development of the 3 maximum housing scenarios under the Equivalency Program is anticipated to result in an increase of 1,515 permanent residents as compared to the Proposed Project. Based on the City General Plan Open Space and Parks Element, the maximum housing scenarios under the Equivalency Program would generate a need for approximately 11 acres of public parkland in the Project Area. The Equivalency Program would fulfill the park and recreation needs of its residents by providing 25 acres of open space on the Project Site. Based on the Equivalency Program’s permanent population estimates, this equates to approximately 2.4 acres per 1,000 people. As such, the Equivalency Program would provide more than enough open space to meet the parks and recreation needs of the planned development, and impacts upon the public parks and recreation system would be less than significant.</p>		<p>Less Than Significant Impact.</p>
<p>Libraries. Development of the Proposed Project would increase demands on library services in the area. Based on written correspondence from the IPL, the City’s libraries are currently meeting the needs of the City, within the limits of existing funding levels. The IPL believes that their current facilities can provide the same level of service to the additional population in the proposed project area, except that the demand for public-use computers will increase. Through the potential allocation of the 4-acre civic site as a joint use school and library and contribution to the City’s tax revenue, the Proposed Project’s impact upon library services would be assessed as appropriate, commensurate with the demands placed on the public library system. The Proposed Project’s impact upon library services would therefore be considered less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less Than Significant Impact.</p>
<p>Libraries – Land Use Equivalency Program Impacts. In three scenarios (Maximum Housing 1, 2 and 3) where there is a net increase in</p>		

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>total number of units and the population, the development of the Equivalency Program is anticipated to result in an increase of 1,515 permanent residents. Based on written correspondence from IPL, the City’s libraries are currently meeting the needs of the City, within the limits of existing funding levels. With additional funds, IPL would provide more hours of service at the three locations, more books and other materials, and a greater number of public-use computers. Development of the Equivalency Program would result in additional tax revenue in the City that could be used to expand the existing library facilities. As with the case of the Proposed Project, the demand for library services under the Equivalency Program could be met by existing service, therefore, the impacts to library services would be less than significant.</p>		
<p>IV.K.1 TRAFFIC/TRANSPORTATION</p>		
<p>Study Intersections</p> <p>The proposed project will result in significant traffic impacts at the following six of the 66 study intersections during the weekday AM peak hour, PM peak hour and/or Saturday mid-day peak hour:</p> <ul style="list-style-type: none"> Int. No. 18: La Brea Ave./Centinela Ave. (City of Inglewood). Int. No. 19: La Brea Ave./Florence Ave. (City of Inglewood). Int. No. 22: La Brea Ave./Century Blvd. (City of Inglewood). Int. No. 25: Prairie Ave./Florence Ave. (City of Inglewood). Int. No. 45: Crenshaw Blvd./Manchester Blvd. (City of Inglewood) Int. No. 47: Crenshaw Blvd/Century Blvd (City of Inglewood) <p>CMP Intersections</p> <p>One of the impacted intersections is also part of the CMP intersection monitoring program (Crenshaw Blvd/Manchester Blvd). The mitigation measure proposed for this intersection will reduce the project impacts at this intersection to less than significant levels based on CMP impact criteria.</p>	<p>Project Mitigation Measures</p> <p>MM L-1. <i>Intersection No. 18: La Brea Avenue/Centinela Avenue (City of Inglewood).</i> The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-2. <i>Intersection No. 19: La Brea Avenue/Florence Avenue (City of Inglewood).</i> The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-3. <i>Intersection No. 22: La Brea Avenue/Century Boulevard (City of Inglewood).</i> The Project Applicant shall provide</p>	<p>Study Intersections</p> <p>Less Than Significant Impact.</p> <p>CMP Intersections</p> <p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>Transit Impacts</p> <p>The Proposed Project is forecast to generate demand for 79 new transit trips (29 inbound trips and 50 outbound trips) during the weekday AM peak hour. During the PM peak hour, the proposed project is forecast to generate demand for nominal 21 new transit trips. Over a 24-hour period, the Proposed Project is forecast to generate a demand for 844 <u>956</u> new daily transit trips. It is anticipated that the existing transit service in the project area will adequately accommodate the project generated transit trips and the public transit system will not be significantly impacted by the Proposed Project.</p>	<p>the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development.</p> <p>MM L-4. Intersection No. 25: Prairie Avenue/Florence Avenue (City of Inglewood). The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p>	<p>Transit Impacts</p> <p>Less Than Significant Impact.</p>
<p>Construction Impacts. Activities related to final grading/structure construction period would generate a higher number of vehicle trips as compared to the grading and export period. Thus, the greatest potential for construction impact on the adjacent street system would occur during the final grading/structure construction period. The construction worker vehicles and miscellaneous trucks are forecast to generate 460 PCE (passenger car equivalency) vehicle trips per day (i.e., 230 inbound and 230 outbound) during peak final grading and structure construction phases at the site. During the weekday a.m. peak hour, the weekday p.m. peak hour, and the Saturday mid-day peak hour, it is estimated that approximately 31 PCE vehicle trips would be generated during each of these peak hours. Based on the peak construction project trip generation forecasts, traffic impacts due to construction activities are forecast to be less than significant based on the City’s significance criteria.</p>	<p>MM L-5. Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-6. Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. <u>In addition, widen the west side of Crenshaw Boulevard north of Century Boulevard by approximately seven feet for a distance of 145 feet (within the existing public right-of-way) and restripe to provide a southbound right-turn only lane. The resultant southbound approach lane configuration would provide one left-turn lane, three through lanes, and one right-turn only lane. The</u></p>	<p>Less Than Significant Impact.</p>
<p>Traffic and Transportation – Land Use Equivalency Program Impacts. The Equivalency Program defines a specific framework within which certain land uses can be exchanged for other land uses without increasing potential traffic impacts. In order to implement the equivalency program, a set of equivalency factors have been prepared. The equivalency factor for each use is derived based on the project’s general mix of land uses as currently proposed and the weekday PM peak</p>	<p><u>In addition, widen the west side of Crenshaw Boulevard north of Century Boulevard by approximately seven feet for a distance of 145 feet (within the existing public right-of-way) and restripe to provide a southbound right-turn only lane. The resultant southbound approach lane configuration would provide one left-turn lane, three through lanes, and one right-turn only lane. The</u></p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>hour project trip generation. Utilization of the equivalency factors for the permitted uses will ensure that impacts remain less than significant.</p>	<p><u>existing traffic signal will be modified to provide a southbound right-turn overlapping phase to be operated concurrently during the eastbound left-turn phase.</u> This improvement will be part of Phase I development.</p> <p>In addition to the Project’s six impacted intersections, the Project Applicant will provide full funding for a traffic signal synchronization network at an additional 13 intersections, for a total of 19 ITS improved intersections. The additional 13 intersections are listed below, along with the phase in which it will be implemented.</p> <p>MM L-7. Intersection No. 24: Centinela Avenue/Florence Avenue (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-8. Intersection No. 14: I-405 Northbound Ramps/Century Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development.</p> <p>MM L-9. Intersection No. 16: Inglewood Avenue/Century Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>III development.</p> <p>MM L-10. Intersection No. 30: Prairie Avenue/Century Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-11. Intersection No. 38: Doty Avenue/Century Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-12. Intersection No. 39: Yukon Avenue/Century Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-13. Intersection No. 40: Club Drive/Century Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>MM L-14. Intersection No. 51: Crenshaw Boulevard/Imperial Highway (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-15. Non-Study Intersection: La Brea Avenue/Hyde Park Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-16. Non-Study Intersection: Market Street/Florence Avenue (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-17. Non-Study Intersection: Centinela Avenue/Hyde Park Boulevard (City of Inglewood) The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development.</p> <p>MM L-18. Non-Study Intersection: 11th Avenue/Century Boulevard (City of Inglewood) The Project Applicant shall provide</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p> <p>MM L-19. <i>Non-Study Intersection: Van Ness Avenue/Century Boulevard (City of Inglewood)</i> The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development.</p>	
<p>Cumulative Impacts</p> <p>The Proposed Project and other development projects in the study area are forecast to contribute to cumulative traffic impacts at 27<u>25</u> of the 66 study intersections. Potential measures have been identified to mitigate the cumulative traffic impacts to less than significant levels. Therefore, it is recommended that the project contribute its pro rata share of fees to implement the recommended cumulative traffic mitigation measures.</p>	<p>Cumulative Impact Mitigation Measures</p> <p>MM L-20. <i>Intersection No. 1: Sepulveda Boulevard/Slauson Avenue (City of Culver City)</i>. To the extent that Culver City (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Culver City determines to approve the implementation of the following improvements, the Project Applicant shall contribute 4.3% of the estimated total estimated cost of implementing the following roadway improvements: (1) Provide a northbound right-turn only lane within the northbound approach lane at this intersection, and (2) Modify the</p>	<p>Less Than Significant Impact at 27 of the 66 study intersections.</p> <p>Significant Unavoidable Impact at 3 of the 66 study intersections.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>eastbound approach on Slauson Avenue at Sepulveda Boulevard to provide one additional through lane. The resultant northbound approach lane configuration would provide two left-turn lanes, three through lanes, and one right-turn only lane. The resultant eastbound approach lane configuration would provide one left-turn lane, three through lanes, and one right-turn only lane. It should be noted that there are three existing departure lanes on Slauson Avenue east of Sepulveda Boulevard.</p> <p>MM L-21. Intersection No. 2: Sepulveda Boulevard/Centinela Avenue (City of Los Angeles). To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements; and (2) the legislative body of the City of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute 0.54% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional northbound left-turn lane, (2) Modify the southbound approach on Sepulveda Boulevard at Centinela Avenue to provide one additional through lane, and (3) Contribute 0.54% of the total cost to install the Adaptive Traffic Control System (ATCS) at this intersection. The resultant northbound approach lane configuration would provide three left-turn lanes, three through lanes, and one right-turn only lane. The resultant</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>southbound approach lane configuration would provide two left-turn lanes, four through lanes, and one right-turn only lane. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures so that the measures may ultimately be infeasible.</p> <p>MM L-22. Intersection No. 3: La Cienega Boulevard (SB)/Slauson Avenue (County of Los Angeles). <u>Los Angeles County: North approach: One left-turn lane, one shared through/right-turn lane, and one exclusive right-turn lane instead of one shared through/left-/right-turn lane and an exclusive right-turn lane. The Project Applicant shall contribute 5.3% (or \$27,825) of the total estimated cost of the identified improvements at this location.</u> The Project Applicant shall contribute 5.3% of the total estimated cost to develop and enhance the traffic signal operations at this location.</p> <p>MM L-23. Intersection No. 5: La Tijera Boulevard/Centinela Avenue (City of Los Angeles). The Project Applicant shall contribute 5.1% of the total estimated cost to develop and enhance the traffic signal operations at this location.</p> <p>MM L-24. Intersection No. 7: La Cienega Boulevard/Centinela Avenue (City of Los Angeles). To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>following improvements, and (2) the legislative body of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute <u>0.41.8%</u> of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional left-turn lane on both the northbound and southbound La Cienega Boulevard approaches, and (2) Contribute <u>0.41.8%</u> of the total cost to install the ATCS at this location. The resultant northbound and southbound approach lane configurations would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane.</p> <p>MM L-25. Intersection No. 10: La Cienega Boulevard/Arbor Vitae Street (City of Inglewood). The Project Applicant shall contribute <u>8.511.4%</u> of the total estimated cost to develop and enhance the City of Inglewood ITS program at this intersection.</p> <p>MM L-26. Intersection No. 12: La Cienega Boulevard/Century Boulevard (City of Los Angeles). The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.</p> <p>MM L-27. Intersection No. 15: Inglewood Avenue/Arbor Vitae Street (City of Inglewood). The Project Applicant shall</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>contribute 18.8253% of the total estimated cost to implement the following roadway improvements: (1) Restrict parking along the north side of Arbor Vitae Street during the weekday AM peak hour so as to allow the westbound approach curb lane to function as a shared through/right-turn lane through the intersection, and (2) Restrict parking along the south side of Arbor Vitae Street during the weekday PM peak hour so as to allow the eastbound approach curb lane to function as a shared through/right-turn lane through the intersection. The resultant westbound approach lane configuration during the weekday AM peak hour would provide one left-turn lane, one through lane, and one shared through/right-turn lane. The resultant eastbound approach lane configuration during the weekday PM peak hour would provide one left-turn lane, one through lane, and one shared through/right-turn lane.</p> <p>MM L-28. Intersection No. 16: Inglewood Avenue/Century Boulevard (City of Inglewood). No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.</p> <p>MM L-29. Intersection No. 17: La Brea Avenue/Slauson Avenue (County of Los Angeles). To the extent that the County of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>following improvements, and (2) the legislative body of Los Angeles County determines to approve the implementation of the following improvements, the Project Applicant shall contribute 5.46.3% of the total estimated cost to implement the following roadway improvements: (1) Re-stripe the southbound La Brea Avenue approach at Slauson Avenue to provide a shared through/right-turn lane through the intersection, (2) Modify the existing traffic signal to remove the existing southbound overlapping right-turn signal phase, and (3) Contribute 5.46.3% of the total cost to develop and enhance the traffic signal operations at this location. The resultant southbound approach lane configuration would provide a left-turn lane, two through lanes, and one shared through/right-turn lane. It should be noted that there are three existing departure lanes on La Brea Avenue south of Slauson Avenue.</p> <p>MM L-30. Intersection No. 20: La Brea Avenue/Manchester Boulevard (City of Inglewood). The Project Applicant shall contribute 5.38.2% of the total estimated cost to implement the following roadway improvements: (1) Provide an additional northbound through lane, (2) Restrict parking along the north side of Manchester Boulevard adjacent to La Brea Avenue during the Saturday Mid-day peak hour and convert the westbound approach right-turn only lane into a shared through/right-turn lane through the intersection, and (3) Contribute 5.38.2% of the cost estimated to develop and enhance the City of Inglewood ITS program at this intersection. Some parking along the</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>east side of La Brea Avenue will need to be restricted during these time periods and some widening may be required to accommodate this measure. The resultant northbound approach lane configuration would provide one left-turn lane, two through lanes, and one shared through/right-turn lane through the intersection. The resultant westbound approach lane configuration during the Saturday Mid-day peak hour would provide one left-turn lane, two through lanes, and one shared through/right-turn lane.</p> <p>MM L-31. Intersection No. 23: Hawthorne Boulevard/Imperial Highway (City of Hawthorne). To the extent that the City of Hawthorne (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Hawthorne determines to approve the implementation of the following improvements, the Project Applicant shall contribute 7.32% of the total estimated cost to implement the following roadway improvements: (1) Provide an additional northbound right-turn only lane; (2) Modify the southbound approach to provide one additional through lane; (3) Modify the westbound approach to provide an additional westbound left-turn lane; and (4) Contribute 7.32% of the total estimated cost to develop and enhance the traffic signal operations at this location. The resultant northbound approach lane configuration would provide two</p>	

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

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.</p> <p>MM L-34. Intersection No. 30: Prairie Avenue/Century Boulevard (City of Inglewood). No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.</p> <p>MM L-35. Intersection No. 33: Prairie Avenue/Imperial Highway (City of Hawthorne). To the extent the City of Hawthorne adopts a city-wide signal synchronization program, the Project Applicant shall contribute 17.3% of the total estimated cost to develop and enhance the ITS program (or a similar traffic signal synchronization system) at this intersection.</p> <p>MM L-36. Intersection No. 35: Crenshaw Drive-Briarwood Lane/Manchester Boulevard (City of Inglewood). The Project Applicant shall contribute 22.6<u>25.5</u>% of the total estimated cost to develop and enhance the City of Inglewood ITS program at this intersection.</p> <p>MM L-37. Intersection No. 38: Doty Avenue-Gate 4/Century Boulevard (City of Inglewood). No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.</p>	

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

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

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>the lead agency to ultimately conclude that these proposed measures are infeasible.</p> <p>MM L-44. Intersection No. 48: Crenshaw Boulevard/Imperial Highway (City of Inglewood). No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.</p> <p>MM L-45. Intersection No. 55: Western Avenue/Century Boulevard (City of Los Angeles). The Project Applicant shall contribute 9.2% of the funding towards the installation of the ATSAC at this intersection (as this intersection is not currently operated under the City of Los Angeles' ATSAC system).</p> <p>MM L-46. Intersection No. 56: Vermont Avenue/Manchester Avenue (City of Los Angeles). To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute 9.9% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional left-turn lane on the southbound</p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
	<p>Vermont Avenue approach at Manchester Avenue; and (2) Contribute 69.9% of the total cost to install the ATSAC/ATCS at the Vermont Avenue/Manchester Avenue intersection (as this intersection is not currently operated under the City of Los Angeles' ATSAC system). The resultant southbound approach lane configuration would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane.</p>	
<p>IV.K.M PARKING</p>		
<p>Construction Impacts. There would be no adverse impacts to existing street parking bordering the Project Site during construction. Due to the large size of the site, construction workers could park in designated areas on the Project Site. During the grading and excavation phase of the Proposed Project, while Casino operations are still active, temporary parking areas will be created adjacent to the Casino for its patrons. Once grading/excavation work is complete adjacent to the Casino site, permanent parking areas will be designated during the construction phase of the Proposed Project. Adequate parking spaces will be maintained throughout grading/excavation and construction, therefore, impacts due to construction will be less than significant.</p>	<p>MM M-1. <u>At the time of Plot Plan review, the Project Applicant shall provide a Shared Parking Study with the parking requirements for the Project Site and the plan will show where the parking spaces are provided on the site. At the time of Plot Plan review, the Project Applicant shall provide a Shared Parking Study with the parking requirements for the Mixed-Use zone on the Project Site and the plan will show where the parking spaces are provided on the site in the Mixed-Use zone and demonstrate that sufficient parking is provided, in accordance with the standards of the Specific Plan.</u></p>	<p>Less Than Significant Impact.</p>
<p>Operational Impacts. Depending upon the actual bedroom counts that are developed in the residential dwelling units, it is estimated that the Project Site could contain up to approximately 7,700 parking spaces in the residentially-zoned areas of the Project Site to accommodate the parking demand generated by residents on the Project Site. This includes up to approximately 6,000 required resident parking spaces (typically in garages), 700 on-site parking spaces, and 1,000 on-street parking spaces. The actual number of residential parking spaces will be determined on the number and type of dwelling units developed.</p>	<p><u>MM M-2. Prior to the construction stage of the Project, the Project Applicant will submit a Construction Staging Plan to be approved by the Planning and Building Department. As part of the Construction Staging Plan, parking for construction workers will be identified on the Project Site</u></p>	<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p><u>Hollywood Park Specific Plan Parking Standards</u></p> <p><u>Mixed-Use Zone.</u> The parking requirements in the Mixed-Use zone (including guest/visitor parking required for residential units that could be built in the Mixed-Use zone) are proposed to utilize a shared parking methodology. Based on an <u>updated Shared Parking Analysis (dated February 9, 2009)</u>, with shared parking, the highest demand for the <u>Mixed-Use Zone</u> is for weekend peak and is estimated to be 4,857 spaces. <u>Valet service has not been factored in to the shared parking demand analysis, nor is it utilized as a means to provide code required parking.</u> <u>Overall, the total number of parking spaces provided will be based on the demands created by the final mix of tenants.</u> shared parking analysis for a mixed-use zone of the Proposed Project, 5,326 parking spaces would be needed to sufficiently supply parking at the peak period. Through the parking requirements to be established in the Specific Plan, the Proposed Project would provide adequate parking in accordance with the actual parking demands during each phase of development and occupancy. In total, the Mixed Use Zone could contain parking structures and lots that could provide up to 7,778 parking spaces. Additionally, the Hollywood Park Specific Plan contains development standards and design guidelines to regulate the overall development of parking for the residential uses. As a result, all of the project's parking demands would be met on site and impacts would be less than significant.</p> <p><u>Residential Zone.</u> It is estimated that the <u>Project Site could contain up to approximately 7,700 parking spaces in the residentially-zoned areas of the Project Site to accommodate the parking demand generated by residents and guests of the residential portion of the Project Site. This includes up to approximately 6,000 required resident parking spaces and approximately 1,000 guest parking spaces. Again, it should be noted that the precise number of resident and guest spaces for the residential units and the location of these spaces will be determined at the time of Plot Plan Review per the requirements of the Development Standards in the Hollywood Park Specific Plan. The Specific Plan's parking standards are</u></p>	<p><u>so as not to affect parking in adjacent neighborhoods.</u></p>	

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p><u>designed to meet the parking demand generated by the housing product types proposed for the Project, which tend to generate a smaller number of residents due to the size of the units and the bedroom counts. As a result, the project's parking demands for the residential land uses would be met and impacts would be less than significant.</u></p> <p><u>Civic Zone. Possible uses for the Civic Site could be a combination of one or more uses, such as an elementary school, library, community center, etc, subject to economic feasibility with respect to construction and operation costs for the respective entity. The Hollywood Park Specific Plan provides that required parking for uses within the Civic Zone shall be as provided in Article 19 of the Inglewood Municipal Code or the Specific Plan.</u></p> <p><u>Because the Applicant would need to demonstrate, as part of the Plot Plan Review process, that sufficient parking is provided, the Proposed Project would provide adequate parking in accordance with the actual parking demands during each phase of development and occupancy. The Proposed Project has the capacity to provide up to 7,778 structured parking spaces in Parking Structures 1 through 5 for the Mixed-Use zone, while the residential parking on the residential land uses would be parked according to the standards in the Hollywood Park Specific Plan and has the capacity to include up to 7,700 spaces. Application of both mixed-use and residential parking standards for the Proposed Project would meet the parking demand generated by the Project. As a result, all of the project's parking demands would be met within the Project Site, and as such, impacts to parking would be less than significant.</u></p>		
<p>Parking – Land Use Equivalency Program Impacts. Under the Equivalency Program, there would be no substantial variation in the Project's street configurations, or related use of subterranean parking. Street parking would be provided in a manner similar to that of the Proposed Project. As with the Proposed Project, the Equivalency Program would provide residential and mixed use parking at the same standards.</p>		<p>Less Than Significant Impact.</p>

Environmental Impact	Code-Required and Project Mitigation Measures	Level of Impact After Mitigation
<p>For any additional retail, office/commercial and hotel area, the Project Applicant would submit a shared parking study at the time of Plot Plan Review to generate the parking demand for the Project. For the additional residential units, the Project Applicant would apply the parking standards in the Hollywood Park Specific Plan to generate the residential (and guest) parking demands for the Project. Furthermore, compliance with the Hollywood Park Specific Plan and Shared Parking Study will ensure that there is sufficient parking to meet the demand.</p> <p>All Project Design Features and/or recommended mitigation measure to minimize parking impacts under the Proposed Project would be implemented under the Equivalency Program. Consequently, with implementation of applicable mitigation measures, parking impacts attributable to the Equivalency Program would be less than significant.</p>		

II. PROJECT DESCRIPTION

A. LOCATION AND BOUNDARIES

PROJECT LOCATION AND BOUNDARIES

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

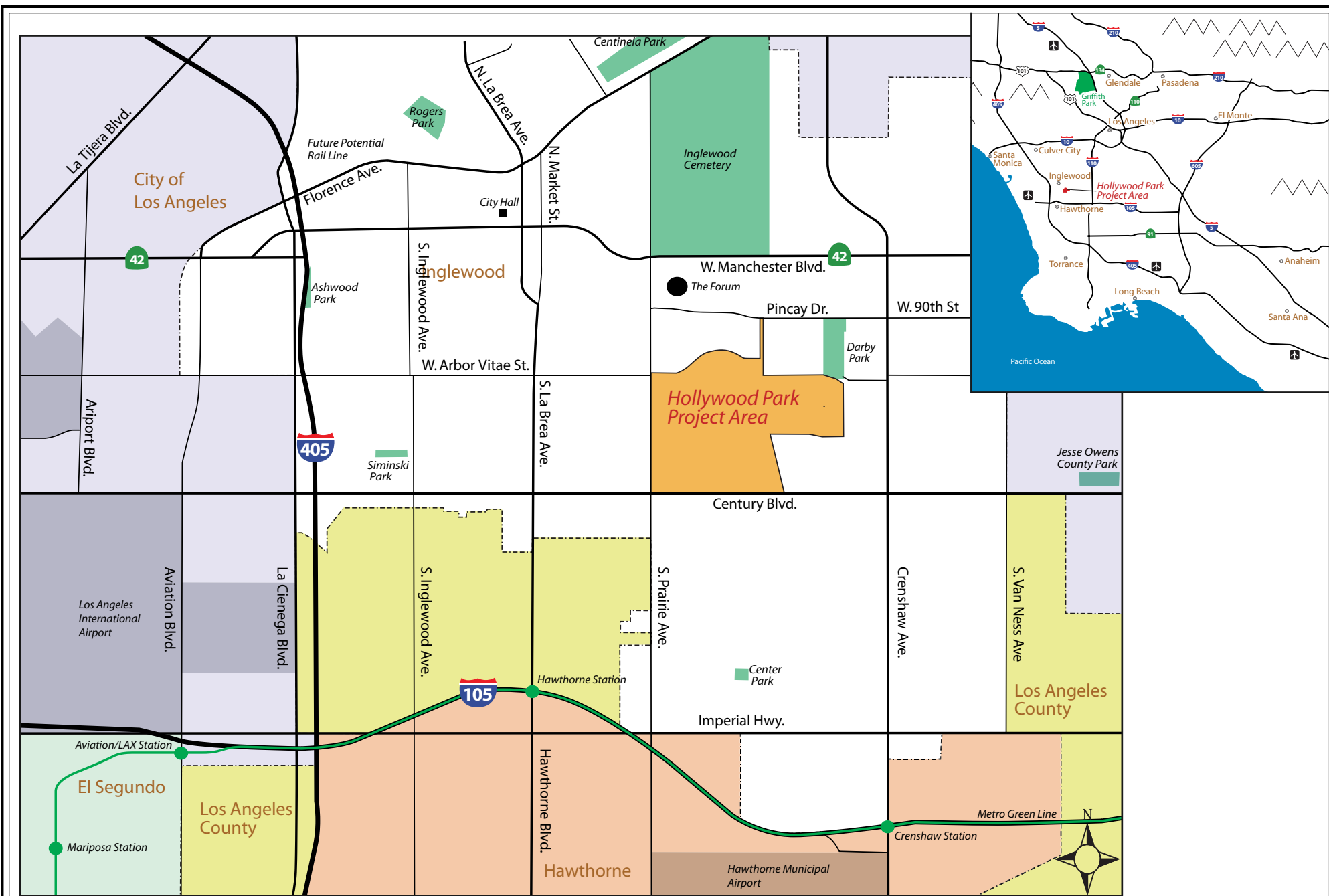
EXISTING GENERAL PLAN AND ZONING DESIGNATIONS

The General Plan land use designation for the Project Site includes Commercial-Residential and Commercial-Recreational land uses. The Project Site is zoned C-R (Commercial and Recreation). In addition, portions of the Project Site are located within two constituent project areas of the Amended and Restated Redevelopment Plan (the “Redevelopment Plan”) for the Merged In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century, and Imperial-Prairie Redevelopment Projects (the “Merged Redevelopment Project Area,” each individual area, a “Constituent Redevelopment Project Area”) - the Century Redevelopment Constituent Project Area and the Manchester-Prairie Redevelopment Constituent Project Area.

SURROUNDING LAND USES

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


¹ 90th Street is known as Pincay Drive between Prairie Avenue and Crenshaw Boulevard.




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



Legend

 Project Boundary

 NORTH

0 300 600 900 1200
Feet

Source: Google Earth, 2007.

II. PROJECT DESCRIPTION

B. STATEMENT OF PROJECT OBJECTIVES

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

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

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

II. PROJECT DESCRIPTION

C. PROJECT CHARACTERISTICS

EXISTING CONDITIONS

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

The general topography of Hollywood Park is relatively flat with a slight slope from north to south. The surface elevation ranges from approximately 152 feet to approximately 92 feet from the northeast portion of the Site to the southwest portion of the Site. The racetrack facilities are raised slightly on building pads and to the east an escarpment borders Darby Memorial Park. Existing landscaping at Hollywood Park includes the infield grass and shrubs, mature palm trees surrounding the Grandstand and Casino buildings, landscaping around the patron entrance to the racetrack and paddock area, and isolated landscaping and eucalyptus trees in the parking areas and behind the Main Racetrack. The Hollywood Park property line along Century Boulevard and Prairie Avenue is planted with a combination of pine trees, shrubs, and groundcover.

Operations and Events

Hollywood Park Race Track

The Hollywood Park Race Track is traditionally open Wednesday through Sunday for an average of five days per week. The total number of days that the racing facility was open in 2006 was 271 days. Of the 271 total days, 99 were live race days hosted by Hollywood Park and the remaining 172 days were days in which Hollywood Park was a simulcast facility for the other southern California racing associations. From 2000~~4~~ through 2006, ~~daily attendance ranged from approximately 780 to 23,000~~the daily Hollywood Park Racetrack attendance records during live racing seasons show the highest weekday attendance at 23,609 patrons, and the highest weekend attendance at 29,151 patrons, while the lowest



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



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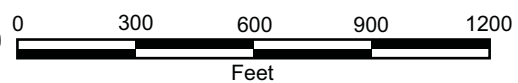


Figure II-3 [REVISED]
Existing Site Plan

weekday attendance was at 782 patrons and the lowest weekend attendance was at 5,017 patrons. During the period from 1989 through 2006, the daily attendance records during live racing indicate that the highest and lowest weekday attendance at Hollywood Park was 42,612 and 312, respectively, while the highest and lowest weekend attendance during the same period was 51,151 and 5,017, respectively. In 2006, the largest day was Derby Day, with attendance that day at 14,460. During the current live race meet, the facility opens at 10:15 a.m. and closes after the last race, which is usually between 5:00 p.m. and 6:00 p.m. for all days except when they run races on Friday night. The last race on Friday night usually runs at around 10:30 p.m. A smaller area of the facility is open later on Wednesday through Sunday for the simulcast of Quarter Horse and Harness races that traditionally run in the evenings.

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

Hollywood Park Casino

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

PROJECT CHARACTERISTICS

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

percent of the residential development will be for-sale (i.e., ownership) residential product. The Preliminary Land Use Plan is depicted in Figure II-4.

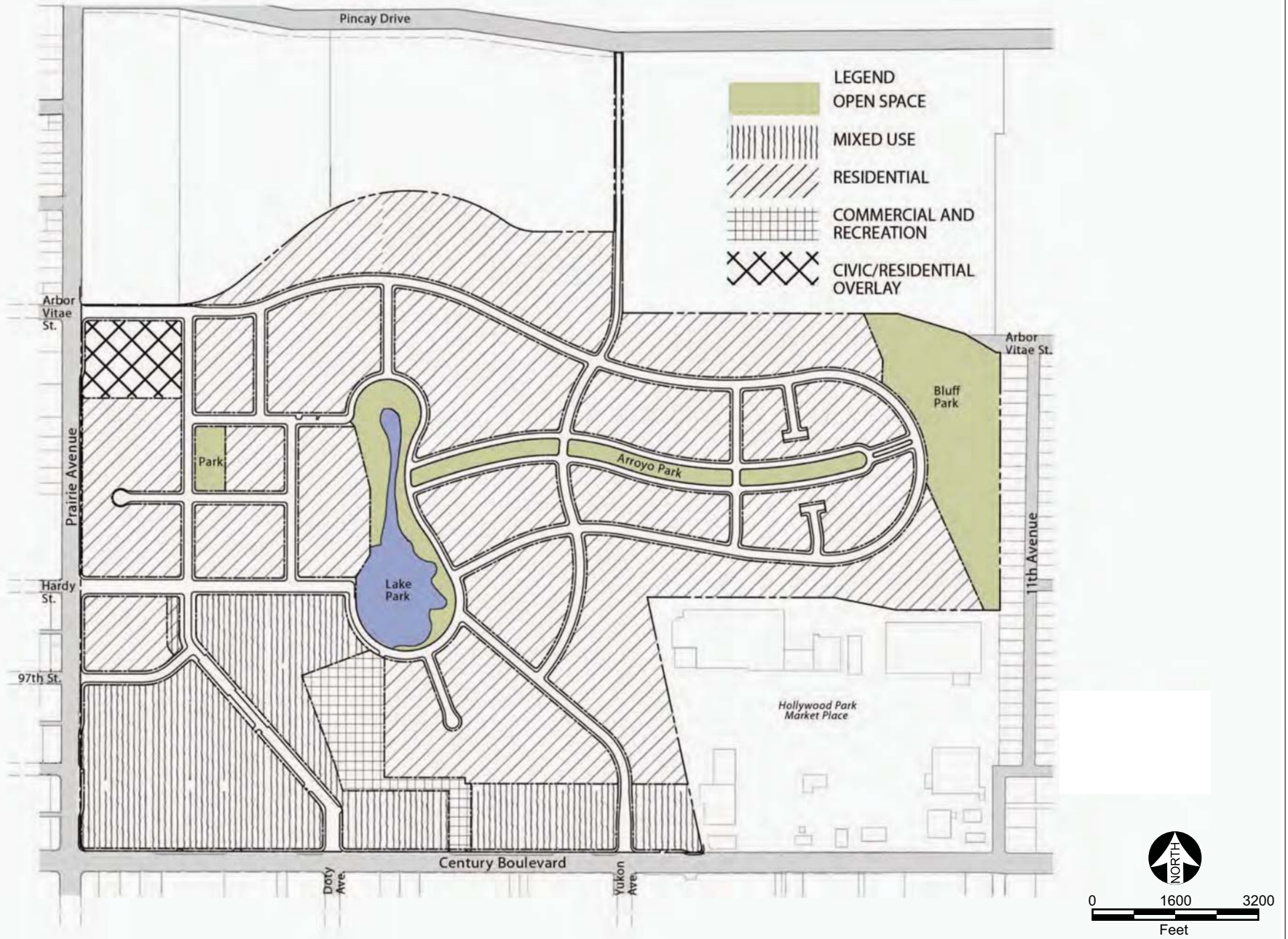
Land Use Equivalency Program

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

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

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

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



Source: Hollywood Park Specific Plan Land Use Map, William Hezmalhalch Architects, February 2009.



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Figure II-4 [REVISED]
Preliminary Land Use Plan

with transferring the maximum level of retail and office/commercial development to obtain the maximum level of hotel development.

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

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

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

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

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

Open Space

The Proposed Hollywood Park Redevelopment Project would include an extensive open space and public park plan to accommodate the recreational needs of the project's residents, employees and visitors/patrons. Approximately 25 acres in the aggregate will be designated for recreation/open space for the development, including 2.5 acres developed as a Home Owner's Association Recreational Facility (HOA Recreational Facility) and 22.5 acres to be conveyed pursuant to public use easements. The two racetrack infield lakes currently existing on the Project Site will be removed and recreated on the Project Site as an integral component of the proposed master plan. The open space and recreation areas are identified in Figure II-4, Preliminary Land Use Plan. The open space areas include Lake Park, Champion Park, Arroyo Park and Bluff Park. Arroyo Park, Lake Park and Champion Park include design features to reduce or avoid water quality and hydrologic impacts. See Section IV. F. Hydrology/Water Quality for a further discussion of the features of these parks. Illustrative renderings of the proposed open space areas, including pedestrian friendly linkages, arroyos, and paseos and walkways are provided in Figures II-5 and II-6, respectively.

Scale and Massing

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

Infrastructure

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



View 1: Rambals on the retail main street.



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



Source: Cooper, Robertson & Partners, 2006.



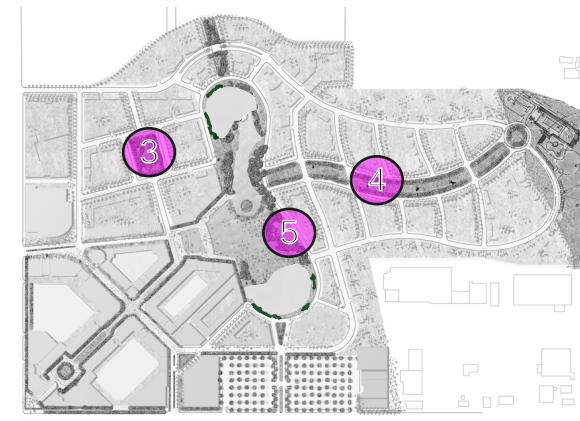
View 3: Champion Park, with condo building in the background



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



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

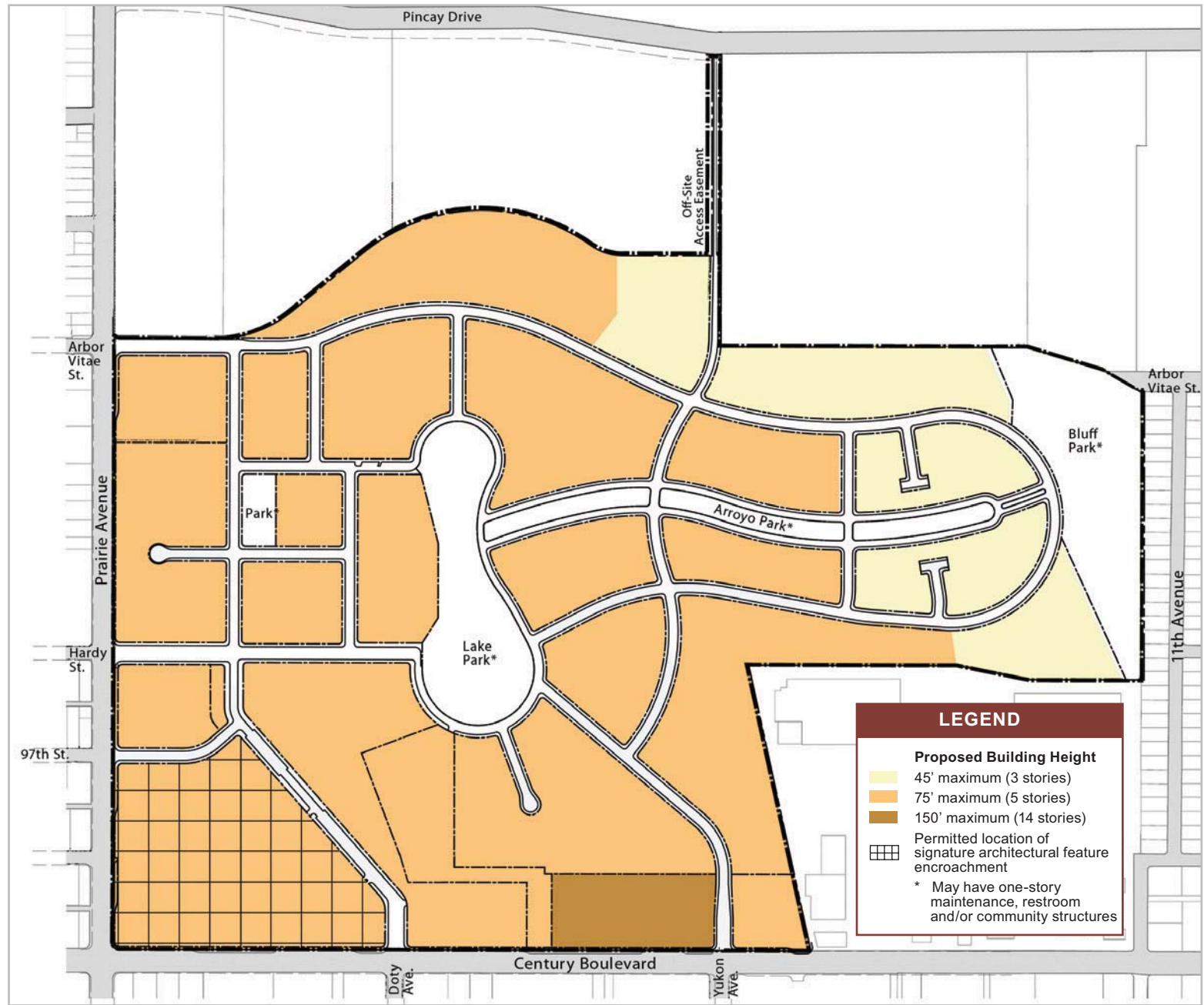


Source: Cooper, Robertson & Partners, 2006.



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



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



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Figure II-7 [REVISED]
Preliminary Proposed Building Heights Limit Map

Water

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

Recycled Water

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

Wastewater

The Proposed Project's wastewater needs would be met through use of the Los Angeles County Sanitation District's Joint Water Pollution Control Wastewater Treatment Plant (JWPCTP) in the City of Carson. County sewers within the project area will be used to carry flows to the treatment plant. The City of Inglewood sanitary system will be used to convey flows off-site and connect into LACSD trunk sewers running close to the Project Site boundary. It is currently intended that a new on-site sewer gravity system will be provided to collect wastewater flows. On-site wastewater flows will be split providing two external points of connection to existing off-site county trunk sewers, including new off-site routes and retaining existing points of connection where possible. The northern half of the site will be routed from Prairie Avenue along Arbor Vitae Street to the west running a new sewer below the existing public street network or easements and connect into the existing 24-inch county trunk sewer flowing south at S. Osage Avenue. Hardy Street could be used as an alternate route. The remainder of the site will be routed across Century Boulevard and connect into the existing 15-inch county trunk sewer

flowing South at Doty Avenue. The minimum size of sewer runs will be 8-inch installed under roadways within the public right-of-way or easements. The Proposed Project will require the abandonment and quit claim of the existing LACSD 12-inch sewer and associated easement that crosses the site. It is currently intended to divert this route and direct off-site upstream flows from Prairie Avenue along Arbor Vitae to the West running a new sewer below the existing public street network and connect into the existing 24-inch county trunk sewer flowing south at S. Osage Avenue. This sewer will still be maintained and operated by LACSD. The wastewater generated by the proposed project will be treated at the JWPCTP.

Storm Drains / Hydrology

The Project Site is predominantly covered with impervious surfaces (effective imperviousness estimated to be 47%) with soft landscaped areas limited to the areas within the Main Track (including two lakes) and Training Track. All on-site storm runoff from roof and at grade parking areas is currently collected by an on-site system of catch basins and storm drains that discharge into the Los Angeles County Department of Public Works Flood Control District (LACFCD) storm-drain system.

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

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

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

Lake Park will be a central attraction of Hollywood Park. The approximately nine-acre Lake Park

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

Natural Gas

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

Electricity

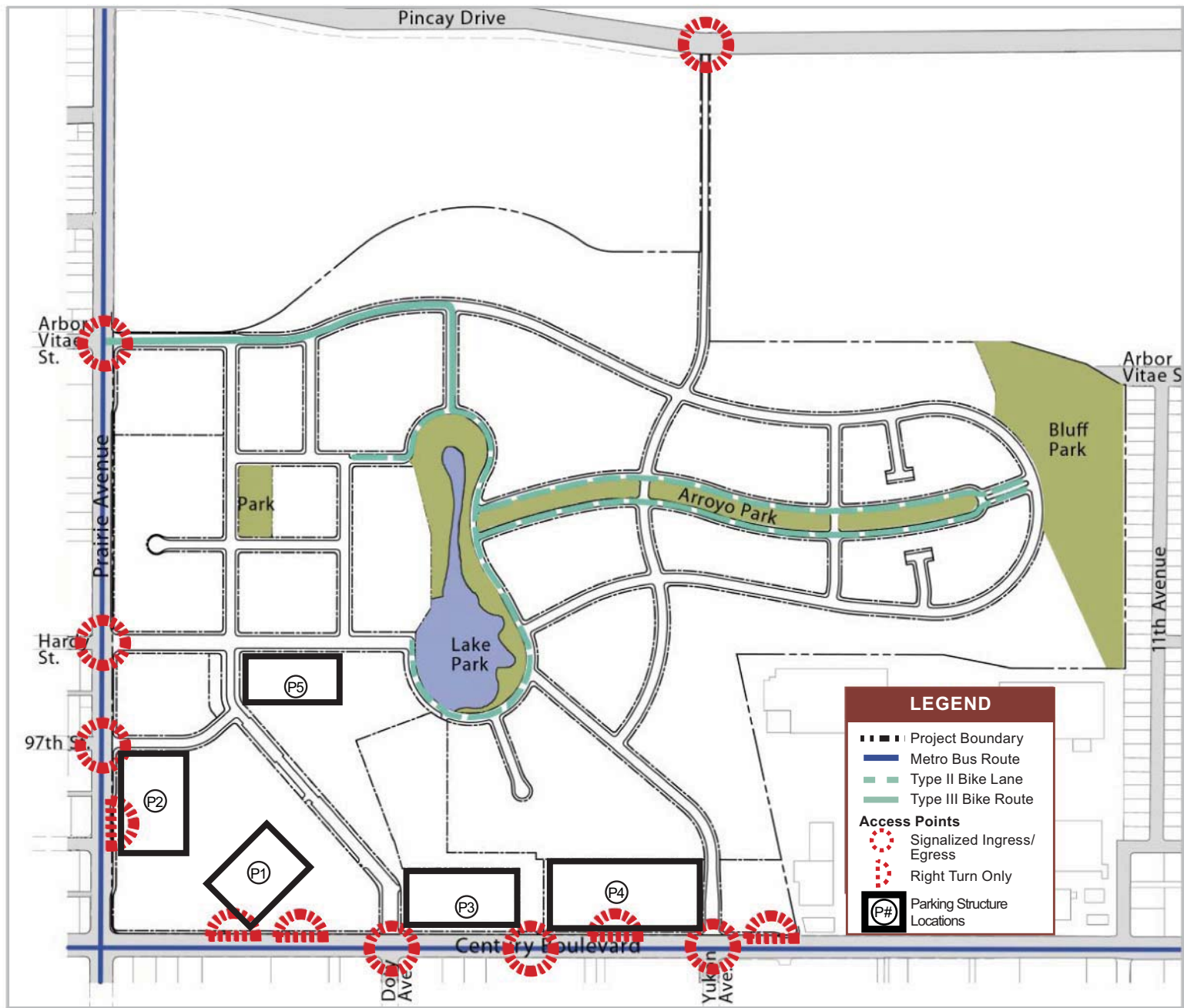
Existing electrical distribution facilities within the project area would be used to serve the Project Site from the Lennox sub-station. The proposed development would tie into existing primary lines running along Century Boulevard and Prairie Avenue. New on-site routes would be designed by Southern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

Telecommunications

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

Circulation and Access

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



Source: Hollywood Park Specific Plan, William Hezmalhalch Architects, February 2009; Parking Structure Overlays provided by WMS, July, 2008.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research



Figure II-8 [REVISED]
Conceptual Circulation Map-Revised

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

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

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

Vehicular Access

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

Transportation Demand Management Strategy

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

- (1) A kiosk or bulletin board providing information about ride sharing and public transportation;
- (2) Bicycle racks at a ratio of one (1) bicycle space for every 50,000 square feet of non-residential development plus an additional three (3) bicycle spaces (developments under 50,000 square feet are exempt from this requirement);

- (3) Employee parking area and safe and convenient access from the employee parking area to all businesses;
- (4) Bus shelter improvements along Century Boulevard and Prairie Avenue adjacent to the project;
- (5) Preferential parking spaces for vanpools;
- (6) Sidewalks or other designated pathways following safe routes from the pedestrian circulation along Century Boulevard and Prairie Avenue to the bicycle parking facilities and into the development; and
- (7) Transportation/Parking Benefit Account (similar to flexible spending accounts) used by on-site employers to provide their employees the opportunity to benefit from tax advantages under the Internal Revenue Code for qualified parking, vanpooling and purchasing of transit passes.

Non-Vehicular Access

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

On-Site and Frontage Roadway Improvements

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

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

Parking

Parking for the Proposed Project would be provided to meet the needs of residents, employees and

visitors. All parking required to support anticipated on-site development would be provided within the Project Site.

Parking for the commercial and retail land uses will be provided with a combination of surface parking lots, structured parking lots and on-street parking spaces within the designated mixed-use land use plan areas (the "Mixed-Use Zone"). Parking in the Mixed-Use Zone will be provided on a shared basis, based upon the mix of uses and estimated parking demands.² ~~Based on a shared parking analysis conducted for a sample mix of likely uses in the proposed Mixed-Use Zone, the project would have a peak parking demand of approximately 5,326 parking spaces. With shared parking, the highest demand for the Mixed-Use Zone is for weekend peak demand and is estimated to be 4,857 spaces.~~

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

Parking Structure 1 ("P1") may contain up to approximately ~~2,449~~2,199 stalls. Parking Structure 2 ("P2") may contain up to approximately 1,121 stalls. The Casino Garage ("P3") may contain up to approximately 2,005 stalls. Parking Structure 4 ("P4") may contain up to approximately 1,883 spaces. Parking Structure 5 ("P5") may contain up to approximately 570 parking stalls. Each of the parking garage structures will be developed as open-air parking structures with 42"-high spandrel walls to block light trespass from vehicle headlights.

Residential parking (including guest parking) will be located within the residential land use areas, and in the Mixed-Use Zone to the extent residential units are located there. Required parking for residents will not be shared with commercial uses. Parking will be calculated by a formula based upon the number of bedrooms and types of units. Residential parking for each unit within the Mixed-Use Zone would be cordoned off from commercial parking areas to provide controlled access for residents for security purposes. The precise number of resident and guest spaces for the residential units will be determined at

² Individual parking structures will be constructed on an as-needed basis to meet the shared-parking demands of the proposed mixed-use development. Because the required parking will vary depending on the exact characteristics of the precise uses, it is anticipated that the actual parking demand identified herein may vary by up to 20% at different stages of buildout based on the shared parking demand analysis model to be established in the Specific Plan. The EIR assumes development of the maximum number of spaces for the Mixed-Use Zone. Final parking required may be less.

the time of Plot Plan Review per the requirements of the Development Standards in the Hollywood Park Specific Plan. It is estimated that the residential parking will comprise up to approximately 7,700 spaces, of which 6,000 are required resident spaces, 700 are on-site guest/visitor spaces and 1,000 are on-street spaces.

Public Benefit Parcel

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

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

Project Signage and Illumination

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

- Project or development identification signs (marquee project identity signs);
- Building identification and tenant signs (anchor signage);
- Directional and service signs;
- Advertising signs and wall graphics;
- Temporary signs;
- Building address signs; and
- Regulatory signs.

Off-Site Improvements

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

PROJECT DESIGN FEATURES

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

Aesthetics

- PDF A-1. Public right-of-way landscape plans shall be prepared by a licensed architect for each phase of the project as provided for in the Specific Plan, and shall be implemented as part of the Project.
- PDF A-2. The applicant shall obtain Planning Division approval of plot plans, including: final site plans, landscape plans and architectural drawings, as provided for in the Specific Plan, prior to the completion of working drawings and subsequent issuance of a building permit.

- PDF A-3. The Proposed project shall be developed in conformance with the Preliminary Building Height Limit Map as adopted in conjunction with the approval of the Specific Plan.
- PDF A-4. Signage shall be in conformance with the development standards and design guidelines as provided for in the Specific Plan. Some specific measures include:
- All garage parking areas shall be identified.
 - Sign conduits, transformers, junction boxes, etc., must be concealed from view.
 - Signs should be clearly legible for universal accessibility. They should meet or exceed ADA standards for type size, type style, color contrast, messaging and heights.
 - Typefaces used on identity signs should be easy-to-read fonts. Consideration must be given to colors and materials of the surrounding support walls.
 - Freestanding identity signs or development markers should be sited to maintain sight lines at entries and major circulation routes.
- PDF A-5. All parking structures within the mixed-use land use areas shall incorporate architectural or site plan design features to shield or avoid light and glare trespass onto adjacent residential properties.

Air Quality

- PDF B-1. As part of the Proposed Project plot plan review process, each builder would incorporate energy efficiency measures and other conservation measures from the Hollywood Park Sustainability Strategy Checklist contained in the Hollywood Park Specific Plan.
- PDF B-2. The Proposed Project incorporates various sustainable design elements and guidelines to promote energy efficiency and other conservation measures. Some examples of the Proposed Project's sustainable design elements include:
- a new mixed-use development that integrates housing, civic, entertainment and retail amenities (jobs, parks, shopping opportunities, etc.) to help reduce vehicle miles traveled resulting from discretionary automobile trips;
 - a mix of land uses that will also contribute to the overall reduction in vehicle miles traveled, by promoting alternative methods of transportation and creating provisions for non-vehicular travel (e.g. pedestrian pathways and paseos, bike paths, etc.) within the Project Site;

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

Geology/Soils

- PDF C-1. Development of open space and recreational areas within the RUZ, as delineated in the Geomatrix 2007 Memorandum re Final Report (included in Appendix C-1 to this Draft

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

Hazardous Materials/Risk of Upset

No PDFs have been proposed for this issue.

Cultural Resources

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

Hydrology/Water Quality

- PDF F-1. Hydrologic source controls will include minimizing runoff from impervious surfaces by routing flows to the Arroyo and Lake Park and using bioretention and other vegetated treatment control BMPs to reduce runoff volumes through evapotranspiration and infiltration.
- PDF F-2. Native and/or climate-appropriate vegetation will be utilized in at least 50% of the developed landscaped areas.
- PDF F-3. The Project's stormwater management system will include the use of the vegetated treatment BMPs, including the Arroyo and Lake Park, as well as parking lot bioretention areas and vegetated swales (where applicable).

- PDF F-4. Treatment control BMPs will be selected to address the pollutants of concern for the Project (see Appendix F-3). These treatment BMPs for the Project include the Arroyo swale, Lake Park, vegetated BMPs, and catch basin inserts. These BMPs are designed to minimize discharge of pollutants to the Maximum Extent Practicable (MEP). Types of treatment control BMPs that will be employed include swales, bioretention areas, catch basin media filtration units, and a wet pond system (e.g., Lake Park).
- PDF F-5. The Project will include numerous source controls, including education programs, animal waste bag stations, street sweeping and catch basin cleaning, an Integrated Pest Management (IPM) Program per the LAUSD standards for common area landscaping in commercial and multi-family residential areas, use of native and/or non-invasive vegetation, product substitution to minimize zinc and copper roofing materials, and directing runoff to vegetated areas.
- PDF F-6. An education program will be implemented that includes both the education of residents and commercial businesses regarding water quality issues. Topics will include services that could affect water quality, such as carpet cleaners and others that may not properly dispose of cleaning wastes; community car washes (e.g., fund raisers); and residential car washing. The education program will emphasize animal waste management, such as the importance of cleaning up after pets and not feeding pigeons, seagulls, ducks, and geese.
- PDF F-7. The Arroyo swale will be designed to safely convey storm flows without scouring the bottom, eroding banks, or re-suspending sediment.
- PDF F-8. All shorelines within Lake Park will be landscaped and maintained to prevent erosion.
- PDF F-9. All storm drain inlets and water quality inlets will be stenciled or labeled.
- PDF F-10. “No Dumping” signs will be posted around the Arroyo and Lake Park and any other locations that appear prone to illicit dumping.
- PDF F-11. The Home Owners’ Associations will maintain stencils and signs described in PDF F-9 and PDF F-10.
- PDF F-12. Pesticides, fertilizers, paints, and other hazardous materials used for maintenance of common areas, parks, commercial areas, and multifamily residential common areas will be kept offsite or in enclosed storage areas.
- PDF F-13. All trash containers will be covered to prevent contact with stormwater.
- PDF F-14. The Home Owners’ Associations or a Landscape Maintenance District will be responsible for operations and maintenance of the Arroyo, Lake Park, vegetated BMPs,

and catch basin media filtration BMPs. Maintenance will be in accordance with a maintenance manual approved by the Director of Planning and Building.

- PDF F-15. Stormwater treatment facilities will be designed to meet or exceed the sizing standards in the LA County SUSMP requirements.
- PDF F-16. Volume-based treatment control BMPs for the Project (i.e., Lake Park, vegetated volume-based BMPs) will be designed to capture 80 percent or more of the annual runoff volume per criteria 2 of the SUSMP.
- PDF F-17. Flow-based BMPs (e.g., the Arroyo, vegetated flow-based BMPs) will be sized using criteria 3, which will provide 80 percent capture or more of annual runoff volume per criteria of the SUSMP.
- PDF F-18. As portions of the site are designed, the size of the facilities will be finalized during the design stage for that portion of the Project by the Project engineer with the final hydrology study, which will be approved by the County of Los Angeles and the City of Inglewood prior to issuing the grading permit(s).
- PDF F-19. The structural BMPs in the stormwater treatment system will be configured to achieve treatment in multiple BMP facilities for the majority of the developed areas. This “treatment train” approach provides more reliable and consistent pollutant removal.
- PDF F-20. Loading dock areas will be covered or designed to minimize run-on and will include catch basin inserts or other appropriate treatment control BMP for treating all runoff prior to discharging to the storm drain system.
- PDF F-21. Direct connections to storm drains from depressed loading docks (truck wells) will be prohibited.
- PDF F-22. Loading docks will be kept in a clean and orderly condition through weekly sweeping and litter control, at a minimum, and immediate cleanup of spills and broken containers without the use of water.
- PDF F-23. Commercial areas will not have repair/maintenance bays or the bays will comply with design requirements.
- PDF F-24. Areas for washing/steam cleaning of vehicles will be self-contained or covered with a roof or overhang; will be equipped with wash racks and with the prior approval of the sewerage agency; will be equipped with a clarifier or other pretreatment facility, and will be properly connected to a sanitary sewer.

- PDF F-25. Retail gasoline outlets or fueling areas will not be included in the Hollywood Park redevelopment.
- PDF F-26. Automotive repair shops will not be included in the Hollywood Park redevelopment.
- PDF F-27. Where feasible, commercial and multifamily parking lots will incorporate vegetated swales or bioretention facilities located in islands or perimeter landscaped areas to promote filtration and infiltration of runoff.
- PDF F-28. Catch basin inserts or media filter vaults will be used to treat parking lot runoff from all areas not treated by vegetated BMPs.
- PDF F-29. Treatment of runoff in bioretention (or vegetated swales) and catch basin inserts will be used to address oil and petroleum hydrocarbons from high-use parking lots.
- PDF F-30. Mosquito fish will be introduced into the pond to naturally control the population of mosquitoes and midges.
- PDF F-31. The project shall be implemented in compliance with the LARWQCB's General Waste Discharge Requirements (WDRs) under Order No. R4-2003-0111, NPDES No. CAG994004 governing construction-related dewatering discharges within the Project Site.
- PDF F-32. The Project will prohibit the use of certain building materials such as roofing/gutter materials that are high in copper and zinc.

Noise

No specific PDFs have been proposed for this issue.

Population, Housing and Employment

No specific PDFs have been proposed for this issue.

Land Use Planning

- PDF I-1. The Proposed Project shall be developed in accordance with the Development Standards and Design Guidelines of the Hollywood Park Specific Plan.
- PDF I-2. The Proposed Project shall be developed in accordance with the provisions set forth under the Hollywood Park Specific Plan, including the final adopted version(s) of the Preliminary Land Use Plan and Preliminary Building Height Limit Map.

PDF I-3. The Applicant shall provide notice to the Federal Aviation Administration in accordance with the applicable requirements of Title 14, Part 77, Subpart B.

Public Utilities

Water

No specific PDFs have been proposed for this issue.

Wastewater

No specific PDFs have been proposed for this issue.

Energy Conservation

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

Solid Waste

PDF J.4-1. As part of the Proposed Project's sustainable goals, the Project Applicant will develop and implement a construction waste management plan that identifies the materials to be diverted from disposal and whether the materials will be sorted on site or commingled on-site during the construction process.

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

PDF J.4-3. The Proposed Project shall recycle construction and demolition waste.

Public Services

Police Services

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

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

Fire Protection

No specific PDFs have been proposed for this issue.

School Services

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

Parks and Recreation

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

Libraries

No specific PDFs have been proposed for this issue.

Traffic/Transportation

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

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

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

Widen and restripe the northbound Prairie Avenue approach to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, widen and restripe the eastbound Hardy Street approach within the existing right-of-way to provide one left-turn lane and one shared through/right-turn lane. Also, provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach. Modify the traffic signal equipment accordingly to accommodate

the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

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

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

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

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

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

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

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

Restripe the northbound Yukon Avenue approach within the existing pavement width to provide one left-turn lane, one through lane, and one shared through/right-turn lane. In addition, provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach. Also, widen and restripe the westbound Century Boulevard approach to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane. Modify the traffic signal equipment accordingly to

accommodate the project access road and serve all vehicular and pedestrian movements at the intersection. This intersection will be improved as part of Phase I development.

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

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

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

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

PDF L-9. La Cienega Boulevard Northbound Ramp at Slauson Avenue (County of Los Angeles).

South approach: Two left-turn lanes and one shared through/right-turn lane instead of one left-turn lane and one shared through/left-/right-turn lane. The Project Applicant shall contribute 5.4% (or \$64,800) of the total estimated cost of the identified improvements.

Parking

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

Project Construction

Construction of the Proposed Project is anticipated to commence upon approval of all applicable entitlements, currently estimated to occur in early 2009. The anticipated buildout year of the Proposed Project is 2014. While it is difficult to determine in advance exactly when and how long the project

approval and entitlement process will take, the following stages of construction are provided as a framework to provide for a reasonably accurate environmental analysis with respect to the Proposed Project's temporary and short-term construction related impacts.

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

Construction Schedule/Phasing

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

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

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

Haul Route

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

Construction Worker Parking/Staging

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

II. PROJECT DESCRIPTION

D. DISCRETIONARY ACTIONS

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

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

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

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

III. ADDITIONS AND CORRECTIONS

The following corrections and additions are set forth to update the Hollywood Park Redevelopment Project Draft Environmental Impact Report (Draft EIR) in response to the comments received as part of the public review period. The corrections and additions have been made to clarify, correct, or add to the environmental impact analysis for the Draft EIR. Changes to the Draft EIR are listed by the corresponding Draft EIR Section, subsection, if applicable, and then page number. Additions and corrections to the Draft EIR derive either from public and agency comments or from additional information desired by the Lead Agency since publication of the Draft EIR. In cases where a correction or comment resulted in a change to the Draft EIR, changes are presented in this section. Deletions are shown with ~~strike through~~ and additions are shown with double underline.

It is important to note that the corrections and additions to the Draft EIR identified did not result in any increased environmental effects that would alter or modify the conclusions of significance contained in the Draft EIR. Therefore, corrections and additions to the Draft EIR did not result in any significant impacts that were not already identified in the Draft EIR.

I. INTRODUCTION/EXECUTIVE SUMMARY


- Page I-6 The first bullet on page I-6 will be modified to read as follows: “No Project Alternative – Continuation of Existing Land Use: This alternative analyzes the environmental consequences of the on-going operation of the existing Hollywood Park Racetrack and Casino ~~without any new discretionary requests.~~”
- Page I-7 The first line of the second bullet on page I-7 will be modified to read as follows: “Alternative RU 800/Reduced residential (800 units maximum)/retention of racing and racetrack.”
- Page I-7 The first and second line of the fourth bullet on page I-7 will be modified to read as follows: “This alternative includes the retention of the Casino and demolition of the Racetrack, and it provides an increased residential project with 3,500 dwelling units.”
- Page I-7 The sentence of the last bullet on page I-7 will be modified to read as follows: This Alternative includes the retention of the Casino and demolition of the Racetrack, and it maximizes the construction of housing, in particular, affordable housing.


II. PROJECT DESCRIPTION

- Figure II-2 Aerial Photograph - This Figure has been revised to be more legible and to correctly label “Arbor Vitae.” Arbor Vitae was incorrectly labeled as “Arbor Vista in the Draft EIR.
- Figure II-3 Existing Site Plan - This Figure has been revised to be more legible and to correctly label “Arbor Vitae.” Arbor Vitae was incorrectly labeled as “Arbor Vista” in the Draft EIR.
- Figure II-4 Preliminary Land Use Plan – This Figure has been revised to include cross hatching overlays instead of shaded overlays to improve the readability of the distinctions between different land use designations. The “Civic Overlay” from the original graphic has been modified to read “Civic/Residential Overlay.” No other changes to the land use plan have been made.
- Figure II-7 Preliminary Building Heights Limit Map – This Figure is renamed to be the “Proposed Building Heights Limit Map.”
- Figure II-8 Conceptual Circulation Map – This figure has been revised to remove the alpha marks to make the figure cleaner to read. No changes to the circulation plan have been made.
- Page II-1 The following clarification is added as a footnote to the end of the third sentence in the first paragraph: “90th Street is known as Pincay Drive between Prairie Avenue and Crenshaw Boulevard.”
- Page II-6 Insert the following sentence on Page II-6 after the first sentence in the second paragraph: “The surface elevation ranges from approximately 152 feet to approximately 92 feet from the northeast portion of the Site to the southwest portion of the Site.”
- Page II-6 The fourth sentence in the third paragraph on Page II-6 is revised to read as follows: “From 2000+ through 2006, ~~daily attendance ranged from approximately 780 to 23,000.~~ the daily Hollywood Park Racetrack attendance records during live racing seasons show the highest weekday attendance at 23,609 patrons, and the highest weekend attendance at 29,151 patrons, while the lowest weekday attendance was at 782 patrons and the lowest weekend attendance was at 5,017 patrons. During the period from 1989 through 2006, the daily attendance records during live racing indicate that the highest and lowest weekday attendance at Hollywood Park was 42,612 and 312, respectively, while the highest and lowest weekend attendance during the same period was 51,151 and 5,017, respectively.”



Legend

 Project Boundary

 NORTH

0 300 600 900 1200
Feet

Source: Google Earth, 2007.



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



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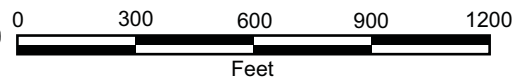
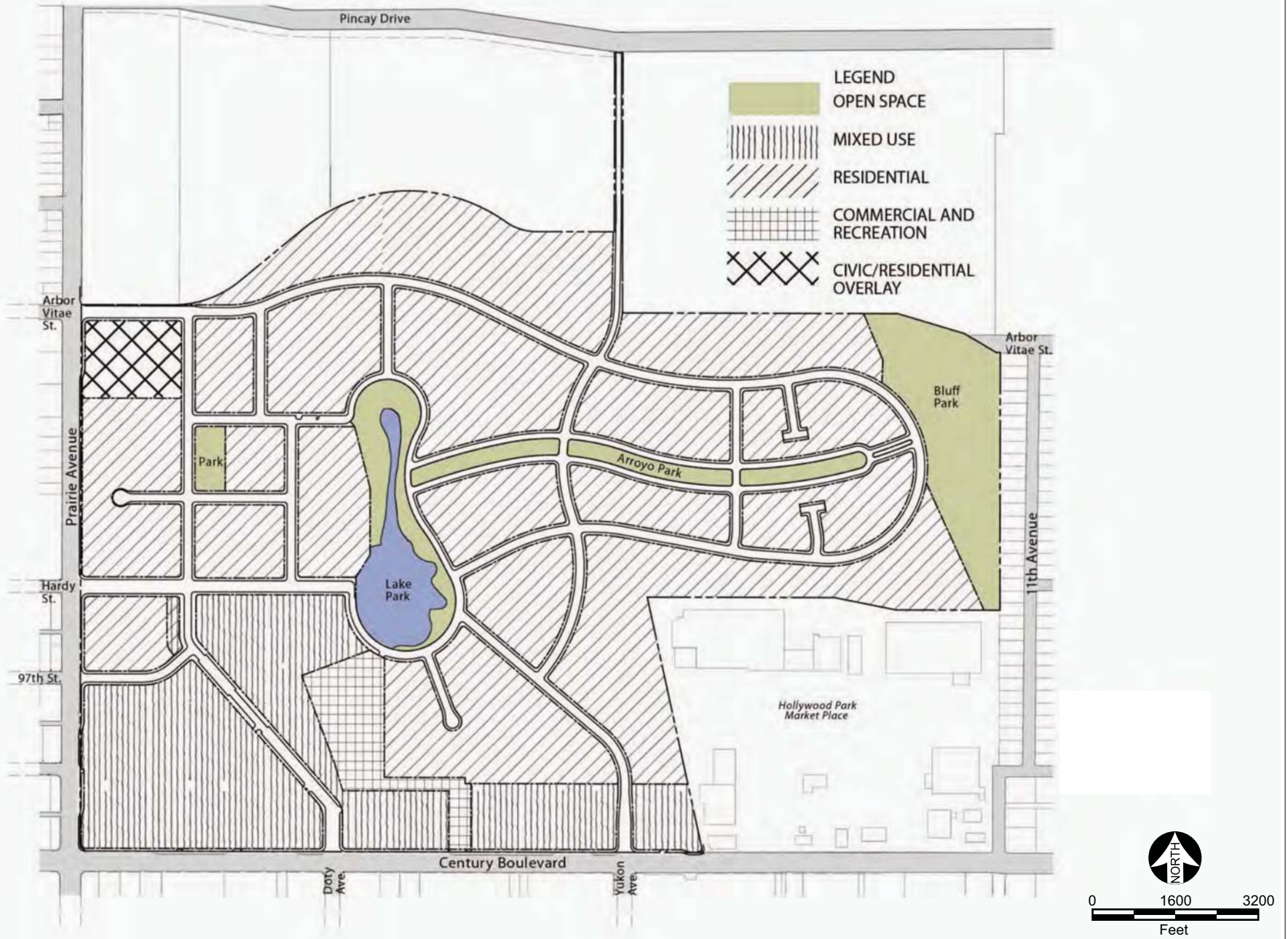


Figure II-3 [REVISED]
Existing Site Plan

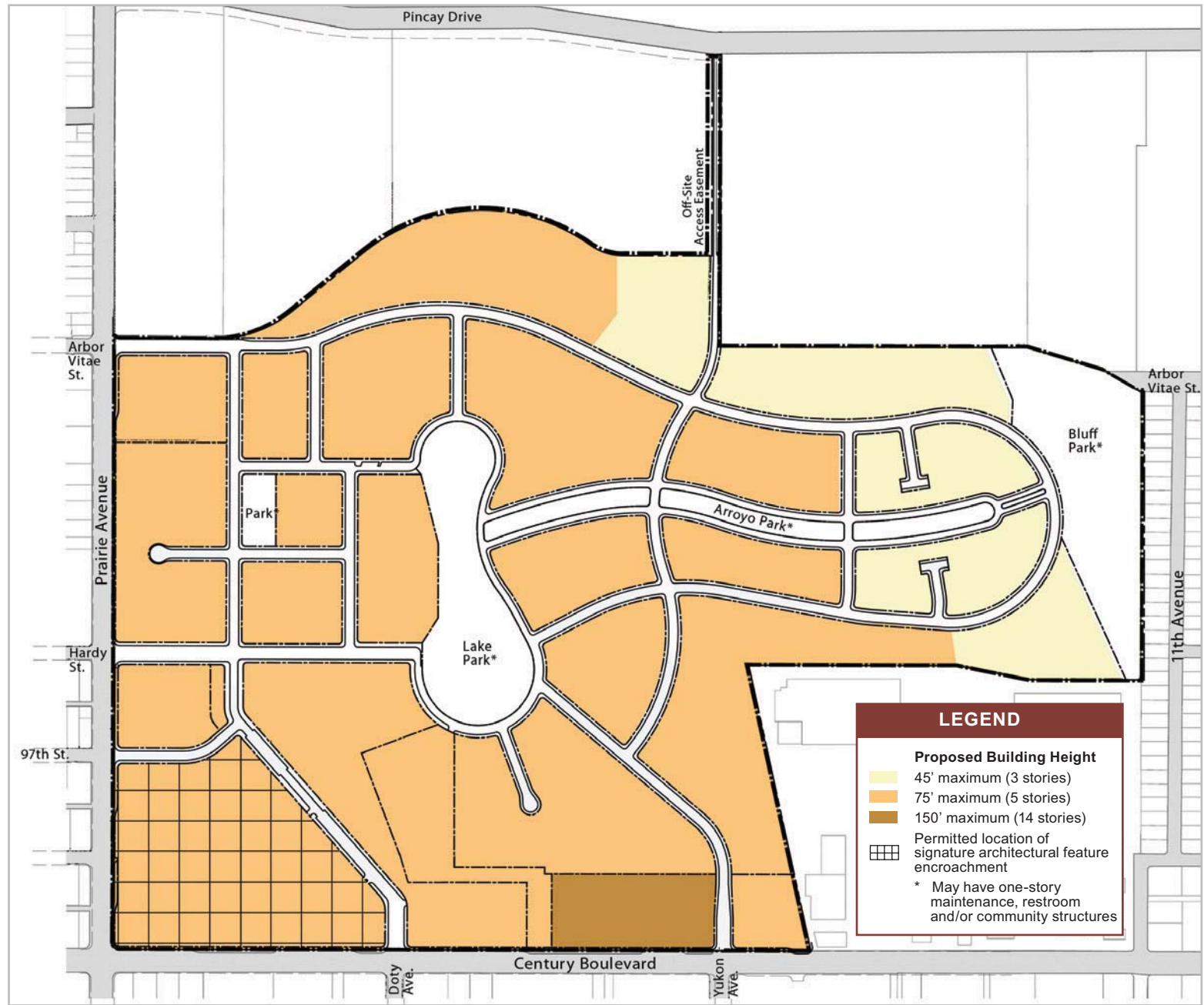


Source: Hollywood Park Specific Plan Land Use Map, William Hezmalhalch Architects, February 2009.



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Figure II-4 [REVISED]
Preliminary Land Use Plan



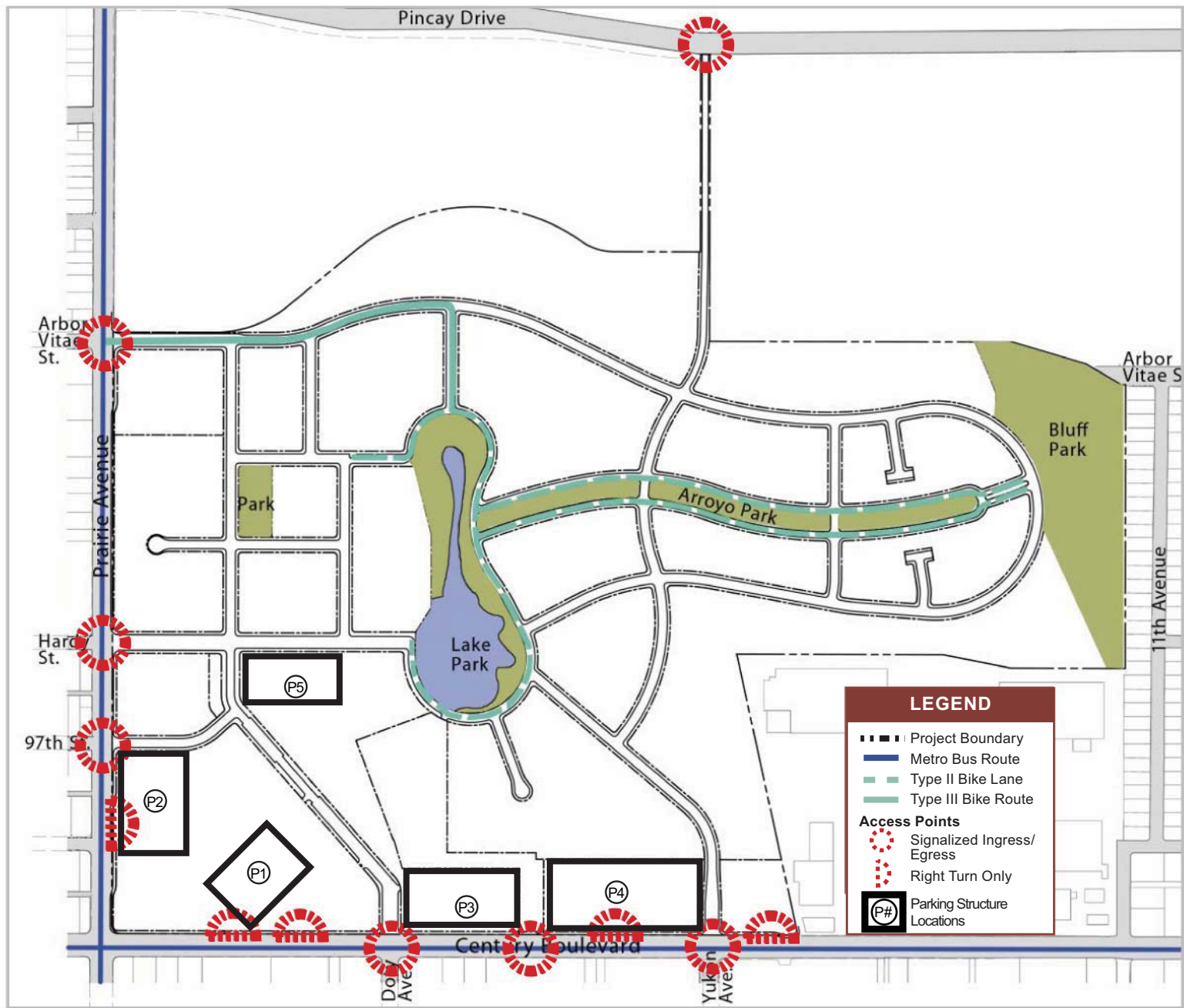
Source: Hollywood Park Specific Plan, William Hezmalhalch Architects, July 1, 2008.



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Figure II-7 [REVISED]
Preliminary Proposed Building Heights Limit Map



Source: Hollywood Park Specific Plan, William Hezmalhalch Architects, February 2009; Parking Structure Overlays provided by WMS, July, 2008.



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Figure II-8 [REVISED]
Conceptual Circulation Map-Revised

- Page II-10 The three bullet points on Page II-10 of the Draft EIR are revised to read as follows:
- 1,000 sf retail is equivalent to 6.25 du, or 1.32 sf office/commercial, or 3.13 hotel rooms;
 - 1,000 sf office/commercial is equivalent to 4.75 du, or 0.76 sf retail, or 2.37 hotel rooms; and
 - 1 hotel room is equivalent to 2.00 du, or 320 sf retail, or 420 sf office/commercial.
- Page II-22: The first sentence of the second full paragraph is revised to read as follows: “Parking Structure 1 (“P1”) may contain up to approximately ~~2,119~~ 2,199 stalls.”
- Page II-15: The Title of Figure II-7 is revised to read as follows: “Figure II-7: ~~Preliminary~~ Proposed Building Heights Limit Map.”
- Page II-27: PDFs E1 and E-2 shall be amended to read as follows:
- “PDF E-1. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve the Turf Club Entrance Pavilion Gate B, so that it later can be relocated to Bluff Park ~~as an entry pavilion~~.
- PDF E-2. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve Hollywood Park’s two primary monuments, Hollywood Gold Cup/Swaps and Native Driver, so that they later can be relocated ~~to Bluff Park as an entry pavilion on the Project Site.~~ on the Project Site.”
- Page II-30: PDF F-31 shall be included as an additional PDF, and will read as follows:
- “PDF F-31 The project shall be implemented in compliance with the LARWQCB’s General Waste Discharge Requirements (WDRs) under Order No. R4-2003-0111, NPDES No. CAG994004 governing construction-related dewatering discharges within the Project Site.”
- Page II-30: PDF F-32 shall be included as an additional PDF, and will read as follows:
- “PDF F-32. The Project will prohibit the use of certain building materials such as roofing/gutter materials that are high in copper and zinc.”
- Page II-31: PDF I-3 shall be included as an additional PDF, and will read as follows:
- “PDF I-3. The Applicant shall provide notice to the Federal Aviation Administration in accordance with the applicable requirements of Title 14, Part 77, Subpart B.”
- Page II-31: PDF J.4-3 from Section IV. J shall be included to read as follows: “PDF J.4-3. The Proposed Project shall recycle construction and demolition waste.”
- Page II-34 PDF L-9 shall be included as an additional PDF, and will read as follows:

“PDF L-9. La Cienega Boulevard Northbound Ramp at Slauson Avenue (County of Los Angeles). South approach: Two left-turn lanes and one shared through/right-turn lane instead of one left-turn lane and one shared through/left-/right-turn lane. The Project Applicant shall contribute 5.4% (or \$64,800) of the total estimated cost of the identified improvements.

Page II-36: Under “Discretionary Approvals,” Second Paragraph, Fifth bullet point shall be revised to read: “L.A. County Sanitation District Sewer Main ~~Realignment~~ Relocation Permit,”

III. RELATED PROJECTS

For purposes of the updated cumulative impact analysis in Section IV. L. Traffic/Transportation, the Homestretch at Hollywood Park Project (Related Project I-19) shall be deleted from the Related Project List in Table III-1. Because the Homestretch at Hollywood Park Project (Related Project I-19) has not proceeded in the intervening years since the Notice of Preparation was circulated, and the Inglewood Promenade Project (Related Project I-1) has now proceeded forward, the Related Projects list in Section III of the Draft EIR has been updated to reflect the current facts.

IV. ENVIRONMENTAL IMPACT ANALYSIS

IV.A. AESTHETICS

No changes to this Section of the DEIR are required.

IV.B. AIR QUALITY

Page IV.B-19: Add the following text and table to the end of the first paragraph: “For illustrative purposes, Table IV.B-3.1, below, provides global warming potential (GWP) values for five greenhouse gases:

Table IV.B-3.1
Global Warming Potentials for Greenhouse Gases

Greenhouse Gas	Global Warming Potential
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	21
Nitrous Dioxide (N ₂ O)	310
Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs)	6,500
Sulfur Hexafluoride (SF ₆)	23,900
<i>Source: BAAQMD Source Inventory of Bay Area Greenhouse Gas Emissions. November 2006.</i>	

Page IV.B-19: Second paragraph under the subheading *Greenhouse Gas Construction Emissions*, add the following sentence to the end of the paragraph: “During the construction process, the proposed project would emit approximately 35,687 CO₂e.”

Page IV.B-19: The first paragraph under the subheading Natural Gas Combustion shall be amended as follows:

Natural Gas Combustion

GHG emissions would result from the combustion of natural gas on the project site. Natural gas usage rates, presented in cubic feet per month, were obtained from Table ~~IV.J-7-IV.J-11~~ in Section IV.J, Public Utilities. As presented in the DEIR, existing land uses on the project site consume ~~46,738,800~~ 3,894,900 cubic feet per year of natural gas, and the proposed land uses would consume ~~285,658,500~~ 23,804,875 cubic feet per year of natural gas. The net increase in natural gas consumption as a result of the Proposed Project would be ~~238,919,700~~ 19,909,975 cubic feet per year.

Page IV.B-20: Table IV.B-4 shall be revised as follows:

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

Scenario	Carbon Dioxide Equivalent (tons per year)
Existing	
Mobile	30,716
Natural Gas	25 <u>2,474</u>
Electricity	9,507
Total Existing	40,248 <u>42,679</u>
Project	
Mobile	65,994
Natural Gas	15,121
Electricity	12,360
Total Project	93,475
Net	53,227 <u>50,778</u>
<i>Source: TAHA, 2008 February 2009.</i>	

Page IV. B-23: The second sentence of the second paragraph is modified to read as follows: “The first phase would include: (1) demolition of existing structures and on-site recycling of demolition debris, (2) grading and excavation, (3) construction works traveling to and

from project sites, (4) delivery and hauling of construction supplies and debris to and from project sites, (5) fuel combustion by on-site construction equipment, (6) the application of architectural coatings and other building materials that release VOC, and (7) asphalt paving.”

Page IV.B-24: The last sentence of the first paragraph shall be revised as follows: “Compliance with Rule 403 during the grading and earthwork phase would reduce regional PM₁₀ emissions associated with construction activities by approximately 61 percent.

Page IV.B-24 Under the subheading ***Toxic Air Contaminants***, that subheading should be changed to read “***Asbestos Containing Materials***.” This correction is associated with the formatting of the section and does not alter the findings or conclusions of the section within this paragraph.

Page IV.B-25 The last sentence at the top of the page (prior to Table IV.B-7) should read: “As such, construction activity would result in a less than significant ~~toxic air contaminant~~ impact with respect to ACMs.” This change corrects a typographical error so that the conclusion corresponds with the text above that the topic is related to ACMs as opposed to the generalized term of “toxic air contaminant.”

Page IV.B-25 Immediately following Table IV.B-8, insert the subheading ***Toxic Air Contaminant (TAC)*** before the next paragraph.

Page IV. B-31: The final paragraph and Page IV.B-31 shall be revised to read as follows:

~~Consistency Criterion No. 1 refers to violations of the CAAQS. CO is the preferred pollutant for assessing local area air quality impacts because it is primarily emitted by motor vehicles, and it does not readily react with other pollutants. Based on methodologies set forth by SCAQMD, one measure to determine whether the proposed project would cause or contribute to a violation of an air quality standard would be based on the estimated CO concentrations at intersections that would be affected by the proposed project. The CO hotspot analysis indicates that the proposed project would not result in an exceedance of the State one and eight hour CO concentration standards. Therefore, the proposed project complies with Consistency Criterion No. 1. The proposed project would result in significant VOC, NO_x, CO, PM_{2.5}, and PM₁₀ impacts during operations. Basin is a non-attainment area under the CCAA for O₃ and the proposed project would exceed the regional daily emissions threshold for ozone precursors, VOC and NO_x. The Basin is also a non-attainment area under the CCAA for PM_{2.5} and PM₁₀ and the proposed project would exceed the regional daily emissions thresholds for PM_{2.5} and PM₁₀. The proposed project would potentially increase the frequency of O₃, PM_{2.5}, and PM₁₀ air quality violations. Therefore, the Proposed Project would not be consistent with Criterion No. 1.~~

Page IV.B-32: Add the following footnote to the end of the sixth sentence of the paragraph under the subheading “Greenhouse Gas Emissions”:

“The California Air Pollution Control Officers Association, CEQA and Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act (CAPCOA) January 2008, discusses three basic options air districts and lead agencies can pursue when contemplating the issues of CEQA thresholds for greenhouse gas emissions. While the CAPCOA guidance document does not promote any one of the methods is discusses, it notes that alternatively, the agency may believe it is premature or speculative to determine a clear level at which a threshold should be set.

Page IV.B-36 The following mitigation measures shall be added to the list of construction phase Air Quality Mitigation Measures:

“MM B-17. All diesel powered construction equipment in use shall require control equipment that meets at a minimum Tier III emissions requirements. In the event Tier III equipment is not available, diesel powered construction equipment in use shall require emissions control equipment with a minimum of Tier II diesel standards.

MM B-18. Contractors shall utilize alternative fueled off-road equipment where possible.

MM B-19. Contractors shall provide temporary traffic controls, such as a flag person, during all phases of construct to maintain smooth traffic flows.

MM B-20. Contractors shall schedule construction activities that effect traffic flow on arterial system to off-peak hour to the extent practicable.”

The operational phase Mitigation Measures originally listed as MM B-17 and MM B-18 in the Draft EIR will be renumbered as MM B-21 and MM B-22, respectively, to read as follows:

MM B-17²¹. The Applicant shall install automatic lighting on/off controls and energy-efficient lighting for office spaces.

MM B-18²². The Applicant shall provide informational packets to new residents within the development locating nearby public transportation options.

IV.C. GEOLOGY/SOILS

This Section has been revised in its entirety and is included at the end of this Section. The revised Section IV.C, Geology is shown in redline/strikethrough text to call out the changes made to the text that appeared in the Draft EIR.

IV.D. HAZARDOUS MATERIALS/RISK OF UPSET

Page IV.D-19: The final sentence in the fourth paragraph on pages IV.D-19 and IV.D-20 of the Draft EIR shall be revised as follows: “Former oil wells that are expected to be covered with new buildings as part of the Project would require appropriate protective measures, e.g., vent cones placed over the wellhead, in accordance with requirements recommendations specified by DOGGR and City of Inglewood based on the encountered conditions at each wellhead.”

Page IV.D-30: Mitigation measure MM D-4 shall be revised as follows: “Former oil and gas wells at the Property shall be located and inspected per DOGGR guidelines. Reabandonment of wells shall be in accordance with DOGGR statute.”

IV.E. CULTURAL RESOURCES

Page IV. E-30: Revise the project design features to read as follows:

PDF E-1. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve the Turf Club Entrance Pavilion Gate B, so that it later can be relocated ~~on the Project Site~~ to Bluff Park.

PDF E-2. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve Hollywood Park’s two primary monuments, Hollywood Gold Cup/Swaps and Native Driver, so that they later can be relocated ~~to Bluff Park as an entry pavilion on~~ the Project Site.

In addition, to further enhance the evaluation in the Draft EIR of the Project Site as a potential historic resource, and to address the concerns raised in the Comment 9.13, Page & Turnbull conducted an additional analysis of the Project Site as a potential historic district. Regardless of its classification, the property would still possess the significance outlined in the Historic Resources Technical Report—that is, the Property is significant under Criterion A (Event) and Criterion C (Design/Construction). However, as a whole, the project site would not qualify as a historic district, due to the numerous alterations and non-contributing additions to the site (See Table 1 of the Historic Resources Technical Report (Appendix E-1 of the Draft EIR), Pages 39-42). The number of potential non-contributing resources would far exceed the number of contributing resources in this potential historic district. The Project Site possesses a total of fifty-one resources; only two of these resources (Turf Club Entrance and Practice Track) would qualify as potential contributors to a historic district. The other forty-nine resources were either: 1) built after the period of significance and are, therefore, considered non-historic; 2) lack historic integrity, due to major

alterations; or 3) lack significance, as related to the outlined significance criteria. While it is clear that Hollywood Park still functions as a racetrack, its historical features from the height of its period of historic significance have been severely altered to the point that as a whole, the property does not convey its significance as a historic racetrack.

Although many of the potential contributors to a historic district were built after period of significance, the mere presence of newer buildings would not by itself render the property ineligible for listing in the National Register; however, the property as a whole has experienced numerous alterations after the period of significance (defined as 1938 to 1950), including but not limited to, the demolition and replacement of the majority of the barns on the project site, addition of new concession stands and ancillary buildings, addition of several major buildings (Pavilion of the Stars, Clinic, and Garden Paddock), and major alterations to the Main Building and Grandstands that removed the Late Moderne architectural detailing. Please refer to Response 9.11, Page IV. E-24 of the Draft EIR, and Pages 27, and 39-42 of the Historic Resources Technical Report (Appendix E-1 of the Draft EIR) for further details regarding the significant physical alternations that have taken place on the Property Site after the period of significance.

For additional information regarding the evaluation of the Property Site as a potential historic district, please refer to the Hollywood Park Preliminary District Evaluation and DEIR Response Preliminary District Evaluation contained in the Appendix M to this Final EIR.

IV.F. HYDROLOGY/WATER QUALITY

Page IV.F-2: The second sentence of the paragraph under the heading Regional Setting, subheading *Dominguez Watershed* is modified as follows: “The Dominguez Watershed is comprised of approximately ~~433~~110 square miles of land in the southern portion of Los Angeles County.”

Page IV.F-6 The fourth and fifth sentences in the first paragraph shall be modified to read as follows:

“The LACDPW requires all storm drain facilities not covered under the Capital Flood Protection conditions to be designed to accommodate an Urban Flood, a 25-year storm which has a ~~100~~-percent chance of 1/25 percent chance of being equaled or exceeded in any year. Using the LACDPW Inglewood 25-year storm, 24-hour isohyet (4.6 inches) and associated runoff coefficient curve for the existing soil type 013, the report determined that the existing site contributes a runoff total of ~~2780.5~~280.5 cubic feet per second (cfs) to the offsite storm drain system during a 25-year storm event.”

Page IV.F-21: The first sentence in the third paragraph is modified to read as follows: “Flow-based BMPs for the Proposed Project will be sized using ~~a rainfall intensity of 0.2 inches per hour~~ criteria 3, which will result in treatment of the same portion of runoff (ie: at least 80%) as using volumetric standards described above.”

Page IV.F-23: The fifth sentence in the fourth paragraph is modified to read as follows: “Some pathogens would be removed through natural ultraviolet light degradation.”

Page IV. F-25: The second sentence is modified to read as follows: “Compared to the Proposed Project without PDF’s (73% imperviousness), the Proposed Project with PDF’s would increase runoff by 55%. ~~yields a reduction in percent imperviousness (55%).~~”

Page IV.F-25: The third sentence in the second paragraph is modified to read as follows: “These ~~non~~-structural BMP measures will reduce rates of runoff, attenuate flow, and improve the quality of stormwater leaving the site.”

Page IV.F-25: The first sentence in the third paragraph on page IV.F-25 will be modified to read as follows: “The proposed lake will be designed to have a static water level and will be sized to provide the necessary storage capacity of approximately 6 acre-feet for the lower lake and 1 acre-foot for the upper lake.”

Page IV.F-50: Page II-30 will be modified to include PDF F-31 as an additional PDF, and will read as follows:

PDF F-31 The project shall be implemented in compliance with the LARWQCB’s General Waste Discharge Requirements (WDRs) under Order No. R4-2003-0111, NPDES No. CAG994004 governing construction-related dewatering discharges within the Project Site.

Page IV.F-28: The following text is added at the end of the third paragraph to read as follows:

“Based on the incorporation of site design, source control, and treatment control BMPs pursuant to SUSMP requirements and the use of a pest management program, potential post-Project impacts associated with pesticides are considered less than significant. The Construction Stormwater Pollution Prevention Plan must contain sediment and erosion control BMPs pursuant to the General Construction Permit, and those BMPs must effectively control erosion and the discharge of sediment along with other pollutants per the BAT/BCT standards. Based on these sediment controls, construction-related impacts associated with pesticides are considered to be less than significant.”

Page IV.F-28: The following text is added at the end of the fourth paragraph to read as follows:

“Los Angeles County conducted PAH analyses on 27 stormwater samples from a variety of land uses in the period 1994-2000 (Los Angeles County, 2000). For those land uses where sufficient samples were taken and were above detection levels to estimate statistics, the mean concentrations of individual PAH compounds ranged from 0.04 to 0.83 µg/L. The reported means were less than acute toxicity criteria available from the literature (Suter and Tsao, 1996). Moreover, the Los Angeles County data do not account for any treatment, whereas the treatment in the Project’s PDFs should result in a

reduction in hydrocarbon concentrations inclusive of PAHs. This makes it very unlikely that impacts will occur to the receiving water due to hydrocarbon loads or concentrations. On this basis, the effect of the Project on petroleum hydrocarbon levels in the receiving waters is considered less than significant.”

Page IV.F-29: The final sentence of paragraph under the subheading *Turbidity* is deleted. The modified paragraph ending will read as follows:

“...Based upon the implementation of the proposed PDFs and construction-related controls described previously in this Section, runoff discharges from the Proposed Project would not cause increases in turbidity that could result in adverse affects to beneficial uses in the receiving waters and the water quality impacts related to turbidity during construction are considered less than significant. ~~The Mitigation Measures identified herein will ensure that BMPs are implemented where appropriate and to reduce impacts related to polluted runoff during construction to less than significant levels.”~~

Page IV.F-50: PDF F-31 shall be included as an additional PDF, and will read as follows:

PDF F-31 The project shall be implemented in compliance with the LARWQCB’s General Waste Discharge Requirements (WDRs) under Order No. R4-2003-0111, NPDES No. CAG994004 governing construction-related dewatering discharges within the Project Site.

Page IV.F-50: PDF F-32 shall be included as an additional PDF, and will read as follows:

PDF F-32. The Project will prohibit the use of certain building materials such as roofing/gutter materials that are high in copper and zinc.”

IV.G. NOISE

Page IV.G-13: Modify footnote (a) in Table IV.G-6 as follows to clarify that the CNEL conversion involves an incremental change over a 24 hour period:

“^a The predicted CNEL for each roadway segment was calculated as peak hour Leq and converted into CNEL (representing a 24 hour average) using the California Department of Transportation Technical Noise Supplement (October 1998). The conversion involved making a correction for peak hour traffic volumes as a percentage of ADT and a nighttime penalty correction. The peak hour traffic was assumed to be ten percent of the average daily traffic.”

Page IV.G-26: Modify Mitigation Measure MM G-7 to read as follows:

~~MM G-7. All residential units shall be designed to minimize noise effects from non-residential activities on the project site, including the casino, parking areas,~~

~~loading zones, alarms from trucks in reverse, and commercial uses with exterior components (e.g., outdoor dining, special entertainment events, etc.). Residential units shall also be designed to minimize aircraft noise and off- and on-site traffic noise. These design measures shall be established to maintain noise levels at interior spaces to be within the 45 dBA noise standard established by Titles 21 and 24. Measures shall to meet the 45 dBA standard may include, but not be limited to, using construction techniques/materials with an STC rating of 40 in habitable rooms/areas, the use of perimeter walls, or sound-rated interior walls between uses, or other site planning and building placement that could reduce or eliminate the line of sight between the noise source and residential units. Prior to the issuance of building permits, the Project Applicant shall utilize an acoustical engineer to demonstrate to the City of Inglewood that the 45 dBA interior noise standard has been achieved at residential dwelling units.~~

IV.H. POPULATION, HOUSING & EMPLOYMENT

No changes to this Section of the DEIR are required.

IV.I. LAND USE PLANNING

Page IV.I-10: Add the following text to the end of the last paragraph under the Land Use Element subheading:

“The goals and objectives for circulation as identified in the Land Use Element are as follows:

- Insure that proposed new uses can be accommodated by adequate and safe streets;
- Promote and support adequate public transportation within the City and the region;
- Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets; and
- Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

The goals and objectives for community facilities as identified in the Land Use Element are as follows:

- Pursue the continued acquisition and development of parks and recreation facilities to the extent feasible within the City’s budgetary capability;
- Maintain the present high level of police and fire services to the extent it is fiscally prudent;
- Encourage the retention of high quality library services; and

- Expand opportunities for cultural and social growth for the City’s residents.”

Page IV.I-24: Add the following SCAG Policy consistency analysis table as Table IV.I-2.B:

**Table IV.I-2.B
SCAG COMPASS GROWTH VISION PRINCIPALS**

Principals and Strategies	Consistency of the Proposed Project
<i>Principal 1: Improve mobility for all residents</i>	
Encourage transportation investments and land use decisions that are mutually supportive.	<p>The Project proposes to increase vehicular capacity on Century Boulevard by widening the north side of Century Boulevard along the entire Hollywood Park project frontage to accommodate an additional travel lane. In addition, the project proposes to increase vehicular capacity on Prairie Avenue at the Arbor Vitae Street, Hardy Street, and 97th Street intersections by widening the east side of Prairie Avenue to provide exclusive right-turn only lanes at these intersections. Also, the traffic signal equipment at all the signalized intersections along the Hollywood Park's Prairie Avenue and Century Boulevard frontages will be modified accordingly. In addition, two new traffic signals are proposed to be installed: one on Century Boulevard and one on Prairie Avenue. All of these physical improvement measures, as described on Pages IV.L-73-75 of the DEIR, were analyzed in the traffic impact study as project design features and construction of these improvement measures will be the sole responsibility of the project.</p> <p>As a new mixed-use development that integrates housing, civic, entertainment and retail amenities (jobs, parks, shopping opportunities, etc.), the Project will help reduce vehicle miles traveled resulting from discretionary automobile trips. Additionally, a mix of land uses will also contribute to the overall reduction in vehicle miles traveled by promoting alternative methods of transportation and creating provisions for non-vehicular travel (e.g. pedestrian pathways and paseos, bike paths, etc.) within the Project Site.</p> <p>The Project is consistent with this strategy.</p>
Locate new housing near existing jobs and new jobs near existing housing.	<p>As discussed on Page IV.H-21 of the Draft EIR, the jobs-housing ratio for the entire South Bay region is projected to increase from 1.48 in 2000 to 1.59 in 2030. Thus, on a regional basis, the region can support more housing given the level of jobs in the region. The Final 2007 RHNA indicates that the SBCCOG region needs to provide 13,733 housing units during the January 1, 2006 to June 30, 2014 planning period. The creation of housing by the Proposed Project is consistent with the goals of the broader region to locate housing in close proximity to jobs. Thus, the project is consistent with this strategy.</p>

**Table IV.I-2.B
SCAG COMPASS GROWTH VISION PRINCIPALS**

<p>Encourage transit-oriented development.</p>	<p>As discussed in Table IV. I-1 of the Draft EIR, the Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. The Project Site is located near well served public transit routes, including bus lines along Century Boulevard, Prairie Avenue and Crenshaw Boulevard, in addition to Metro Green Line stations at the Hawthorne Station and Crenshaw Station. In this way, the project is consistent with this strategy.</p>
<p>Promote a variety of travel choices.</p>	<p>The Proposed Project is a mixed-use community that will reduce the number of auto trips and vehicle miles traveled by placing housing opportunities in close proximity to transit and jobs. The Project will also create open space, retail, entertainment, casino/gaming and civic opportunities for residents to walk and bike. The Conceptual Circulation Plan also includes bike paths throughout the development. The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. Overall, the goal of the Hollywood Park Specific Plan is to create a safe, walkable, pedestrian oriented village, with extraordinary open space, parkway, and recreational amenities. Therefore, the Project is consistent with this strategy.</p>
<p><i>Principal 2: Foster livability in all communities</i></p>	
<p>Promote infill development and redevelopment to revitalize existing communities.</p>	<p>The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As an infill redevelopment, the Proposed Project would reduce costs by using and improving existing utility and roadway infrastructure.</p> <p>As discussed in further detail in Section IV.H, Population, Housing & Employment, horseracing in California is a declining business industry largely due to increased competition for the public's recreation and entertainment dollars. The increases in Indian gaming in California and the increases in purses in other states have called into question the long-term economic viability of horse racing in California. As such, the redevelopment of the Project Site would create a new, revitalizing use on an infill development site, and promote the Merged Redevelopment Plan's goal to revitalize existing development in a manner that is consistent with the environmental, social and economic goals of the City. Thus, the project is consistent with this strategy.</p>

**Table IV.I-2.B
SCAG COMPASS GROWTH VISION PRINCIPALS**

<p>Promote developments that provide a mix of uses.</p>	<p>The Proposed Hollywood Park Redevelopment Project consists of the redevelopment of the approximately 238-acre Project Site, including the Racetrack Grandstand and the Pavilion/Casino and the construction of a new mixed-use development. The Proposed Project includes demolition of most of the improvements and structures on the Project Site, including the Hollywood Park Racetrack and grandstand, and the new construction of approximately 2,995 dwelling units (du), 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, a 300-room hotel including 20,000 sf of related meeting space, and 10,000 sf of community serving uses for the Home Owners’ Association (HOA). The Pavilion/Casino will be renovated at its existing location on the Project Site and reconfigured as a maximum 120,000 sf Casino/gambling facility. As part of the Development Agreement, a four-acre site is proposed to be made available to a public entity for civic uses, which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility with respect to construction and operation costs for the respective entity. Approximately 25 acres will be designated for recreation/open space for the development, including 2.5 acres to be developed as an HOA Recreational Facility. Given this, the project is consistent with this strategy.</p>
<p>Promote “people-scaled,” pedestrian-friendly communities.</p>	<p>The Specific Plan establishes a set of development standards and design guidelines based on the design principles of the Project and are tied to creating pedestrian-scaled street frontages. One of the most significant design principles of the Project is creating a streetscene marked by pedestrian-oriented retail/commercial corridors created through strong relationships between building form, street and pedestrian paths, and architecturally interactive facades. The Proposed Project is a mixed-use development project that integrates residential, commercial, civic and recreational open space areas, and is carefully planned in a way that would be cohesive with the adjacent residential neighborhood. The Conceptual Circulation Plan provides a safe and efficient network of roadways, providing for pedestrian trail systems and bicycle circulation in conjunction with the street network. A hierarchy of bicycle connections is incorporated throughout the development to encourage the use of walking, jogging and bicycling. The Conceptual Circulation Plan would provide connections to the existing City of Inglewood Street network and convenient access to individual residential neighborhoods, employment, and the mixed-use core. Therefore, the project is consistent with this strategy.</p>

**Table IV.I-2.B
SCAG COMPASS GROWTH VISION PRINCIPALS**

<p>Support the preservation of stable, single-family neighborhoods.</p>	<p>Careful consideration has been given to the land use plan implemented through the Hollywood Park Specific Plan to create a community that is compatible with the uses surrounding it. Since there are existing single family houses to the north and east of the Specific Plan area, the housing types permitted in the neighboring Specific Plan area are of a compatible density and Bluff Park provides an open space buffer between the existing single-family dwellings and the Hollywood Park residential community. The retail/entertainment area of the Specific Plan community is located near the major roadways of Century Boulevard and Prairie Avenue and is compatible with the commercial uses nearby. The Hollywood Park development provides a land use plan where the more sensitive land uses (Single-Family Housing Type) are located away from adjacent major arterials roads and the less sensitive uses (commercial and office) are located near these roads. Thus, the project is consistent with this strategy.</p>
<p align="center"><i>Principal 3: Enable prosperity for all people</i></p>	
<p>Provide a variety of housing types in each community to meet the housing needs of all income levels.</p>	<p>The Proposed Project will provide a variety of housing types throughout the Project Site. Per the Specific Plan, the Proposed Project will contain: Mixed Use Residential Housing, Single-Family Housing, Townhome Housing, and Wrap/Podium Housing. The Mixed-Use housing type typically includes condos/flats, live/work and shopkeeper units, wrap and podium buildings with residential over retail. The Single-Family housing type typically includes small lot, single family detached units, motor or green court cluster units. The Townhome housing type typically includes brownstones, townhouses and triplexes. The Wrap/Podium housing type typically includes condominium and flat units in wrap or podium buildings. The Proposed Project will provide ownership-housing opportunities of different pricing for all income levels. Thus, the project is consistent with this strategy.</p>
<p>Support educational opportunities that promote balanced growth.</p>	<p>The Proposed Project will provide for the provision of a four-acre Civic site that can be used for an elementary school with joint uses or other civic/education uses. Because of this, the Project is consistent with this strategy.</p>
<p>Ensure environmental justice regardless of race, ethnicity or income class.</p>	<p>The employment and retail opportunities provided by the Proposed Project would be available to all segments of the community, irrespective of race, ethnicity, or income class. Therefore, the Project is consistent with this strategy.</p>

**Table IV.I-2.B
SCAG COMPASS GROWTH VISION PRINCIPALS**

<p>Support local and state fiscal policies that encourage balanced growth.</p>	<p>The Proposed Project will encourage balanced growth by revitalizing the City of Inglewood by providing an example of “smart growth” infill development consisting of mixed-use retail, office, hotel, residential development integrated with open space in job-rich area. The Project is economically viable and promotes the City’s economic well being by significantly increasing property and sales tax revenues while providing high-quality uses. The Proposed Project also has the opportunity for transient occupancy tax on the hotel site. Furthermore, the Proposed Project is preserving the Casino Card Club on the Project Site, which generates significant source of income to the City from the taxes associated with it. Thus, the Project is consistent with this strategy.</p>
<p>Encourage civic engagement.</p>	<p>The Proposed Project includes outdoor plazas, pedestrian networks, and eating areas which enhance the cultural fabric of the community. In addition, the proposed project would be a pedestrian-oriented development and contribute to a vibrant day and evening environment. The development would also include 25 acres of open space, which would include a water feature that would be accented by small-scale restaurants and cafes, commercial and residential uses along its perimeter. The project would also provide for the provision of a four-acre Civic site for an elementary school with joint uses (such as library, auditorium, etc) or other civic uses.</p>
<p><i>Principal 4: Promote sustainability for all generations</i></p>	
<p>Preserve rural, agricultural, recreational and environmentally sensitive areas.</p>	<p>As discussed above, the Proposed Project is an infill development project and would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As an infill redevelopment in an urbanized area, the Proposed Project would not disturb rural, agricultural, recreational and environmentally sensitive areas. Thus, the project is consistent with this strategy.</p>
<p>Focus development in urban centers and existing cities.</p>	<p>The Project Site is in Inglewood, California, which is in an existing urban center within an existing built-out city. Given this, the project is consistent with this strategy.</p>

**Table IV.I-2.B
SCAG COMPASS GROWTH VISION PRINCIPALS**

<p>Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste.</p>	<p>As a mixed-use, infill development in an existing urbanized community, the Project accommodates growth that uses resources efficiently because it develops a mix of uses in an existing urbanized area accessible to transit and currently served by existing utilities and roadways, and is located in an area that is generally developed, thereby preserving other open space areas.</p> <p>As discussed above, as a new mixed-use development that integrates housing, civic, entertainment and retail amenities (jobs, parks, shopping opportunities, etc.), the Project will help reduce vehicle miles traveled resulting from discretionary automobile trips. Additionally, a mix of land uses will also contribute to the overall reduction in vehicle miles traveled by promoting alternative methods of transportation and creating provisions for non-vehicular travel (e.g. pedestrian pathways and paseos, bike paths, etc.) within the Project Site. In this way the Project will help reduce pollution in the region.</p> <p>The Specific Plan, through the Sustainability Checklist, also promotes reducing the amount of waste produced during the operational stage of the Project. Under “Goal 4: Reduce, Reuse and Recycle” in the Sustainability Checklist, Goal 4-5 will require each project within the Specific Plan to provide adequate space for storing and handling recyclables. For example, single family units will have dual bins for each unit—a recycle bin and a garbage bin. Multi-family units may have recycle bins and garbage bins for each unit or grouped recycling and garbage collection areas. All in all, the project is consistent with this strategy.</p>
<p>Utilize “green” development techniques.</p>	<p>The City of Inglewood does not have any local codes or policies that specifically address green building standards or climate change. However, the Proposed Project incorporates sustainability practices into the project design as a method to increase energy efficiency, reduce greenhouse gas emissions and promote green building practices. Specifically, PDF B-2, which is discussed in Section II, Project Description and Section IV.B, Air Quality, lists some sustainability measures to be incorporated into the Project’s design.</p> <p>Furthermore, as part of the Plot Plan Review process, the Hollywood Park Specific Plan requires submission of a completed “Sustainability Checklist” specifying those sustainability measures to be included in the development that is the subject of the Plot Plan Review/Building Permit. Therefore, the project is consistent with this strategy.</p>
<p><i>Source: Southern California Association of Government, “Compass Growth Vision Report” (June 2004). Consistency analysis provided by Christopher A. Joseph & Associates.</i></p>	

Page IV.I-29: Add the following General Plan Land Use Element consistency analysis table as Table IV.I-2.C:

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

Goals and Objectives	Consistency of the Proposed Project
<i>General Goals and Objectives</i>	
<p>Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.</p>	<p>The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property. As such, it is a redevelopment project that would maximize the use of land on site and would thus be consistent with this goal. The Proposed Project is a mixed-use community that will place housing opportunities in close proximity to transit and jobs, and create open space, retail, entertainment, casino/gaming and civic opportunities.</p>
<p>Help promote sound economic development and increase employment opportunities for the City’s residents by responding to changing economic conditions.</p>	<p>The Proposed Project is a mixed-use community that will increase employment opportunities by providing 3,135 jobs, which is 517 more jobs than currently exist on the Project Site.</p>
<p>Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.</p>	<p>The Proposed Project would support implementation of this policy by including 2,995 new residential units. The Project Site is adjacent to residential uses. Therefore, it will preserve and expand the neighborhood feeling, which will help to conserve the housing stock in the project vicinity.</p>
<p>Develop a land use element that facilitates the efficient use of land for conservation, development and redevelopment.</p>	<p>The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As such, it is a redevelopment project that would maximize the use of the Project Site by creating a mixed-use development on what could be considered a currently under-utilized property in the City. The Proposed Project would thus be consistent with this goal.</p>
<p>Promote Inglewood’s image and identity as an independent community within the Los Angeles Metropolitan area.</p>	<p>The Proposed Project would contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space. It would further enhance the visual appearance and appeal of the City which would help to project a positive image and independent identity. Thus, the Proposed Project would be consistent with this objective.</p>

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<i>Commercial Land Use Designation</i>	
Create and maintain a healthy economic condition within the present business community and assist new businesses to relocate within the City.	The Proposed Project would be consistent with this objective by creating a mixed-use development with 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, and a 300-room hotel including 20,000 sf of related meeting space.
Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.	The Proposed Project would be consistent with this objective by creating a mixed-use development with 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, and a 300-room hotel including 20,000 sf of related meeting space which could be utilized to by locals to further enhance and stimulate their local businesses. In addition, the Proposed Project would result in 517 more jobs than currently exist on the Project Site which would help strengthen the commercial community.
Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood’s major streets.	The Proposed Project would stimulate the existing visual character within the City of Inglewood by revitalizing the area with new and infill development, and would thus be consistent with this goal.
Encourage the continued development and promotion of existing commercial centers such as Crenshaw-Imperial and Morningside Park.	The Project Site is located within portions of the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area, which are part of the Merged Redevelopment Project Area. As discussed in the Draft EIR, the Project will be subject to these redevelopment plans and the Proposed Project would be consistent with the goals and objectives of those plans.
Continue to promote the development of high quality commercial office space at appropriate locations within the City through the redevelopment process.	The Proposed Project is a mixed-use redevelopment project that includes 75,000 sf of office/commercial space, and would therefore be consistent with this objective.
Promote the development of commercial/recreational uses which will complement those which already are located in Inglewood.	The Proposed Project is a mixed-use development project that integrates commercial, residential, civic and recreational open space areas, and would be consistent with this objective.

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<i>Residential Land Use Designation</i>	
<p>Encourage neighborhood stability and conservation by reducing the amount of land designated for high density development.</p>	<p>The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. The Proposed Project consists of a mixed-use development, which includes a variety of types of parks and open space areas. For security reasons, some individual areas may be gated off (for example, a tot-lot, swimming pool or homeowners club house). Certain recreation facilities, such as the private swimming pool and restroom facilities located in Bluff Park will be open to Hollywood Park residents or facility members only. Other parks and open spaces will be maintained by the various home owners associations and generally open for public use during daytime hours only. After daylight hours parks and open spaces will only be open to Hollywood Park residents. The Proposed Project would fulfill the park and recreational needs of its residents by providing 25 acres of open space on the Project Site. This added open space would help alleviate the City’s existing substandard provision of parkland and recreational facilities. The Proposed Project would provide more than enough open space to meet the parks and recreation needs of the planned development, and would help to reduce the density of the development while also integrating the Project Site with surrounding residential uses.</p>
<p>Promote the maintenance, rehabilitation, and modernization of the City’s housing stock.</p>	<p>The Proposed Project would result in redevelopment of the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood, and would include 2,995 dwelling units. Further, the Project would eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities near retail uses, restaurant uses, and public open space within portions of the Merged Redevelopment Project Area.</p>

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Encourage the preservation of Inglewood’s fair share of housing for low and moderate income persons.</p>	<p>The Proposed Project would support implementation of this policy by including 2,995 new residential units. The Proposed Project would provide a range of for sale and rental products within a variety of product types (i.e., single-family attached and detached units, stand alone multi-family developments and mixed-use multi-family developments) which would target persons of all income levels. For a detailed discussion of contributions to affordable housing through tax increment financing and the 20% set-aside see Section IV.G, Population, Housing & Employment of the Draft EIR.</p>
<p>Safeguard the City’s residential areas from the encroachment of incompatible uses.</p>	<p>The Proposed Project is a mixed-use development project that integrates residential, commercial, civic and recreational open space areas, and is carefully planned in a way that would be cohesive with the adjacent residential neighborhood. The Conceptual Circulation Plan provides a safe and efficient network of roadways, providing for pedestrian trail systems and bicycle circulation in conjunction with the street network. A hierarchy of bicycle connections is incorporated throughout the development to encourage the use of walking, jogging and bicycling. The Conceptual Circulation Plan would provide connections to the existing City of Inglewood Street network and convenient access to individual residential neighborhoods, employment, and the mixed-use core. Therefore, the Project would be consistent with this objective.</p>
<p>Foster the revitalization or, if necessary, the recycling of residential areas which cannot provide a decent living environment because of jet noise impact.</p>	<p>The Proposed Project will provide new housing in a designated Airport Land Use Plan area. The Proposed Project has been designed in a manner that is consistent with the Airport Land Use Plan Land Use Compatibility Chart. All residences, including any proposed residential uses that fall within the Airport Influence Area’s 65 dBA CNEL contour, would be developed in a manner that achieves a 45 dBA interior noise level.</p>
<p>Encourage suitable condominium development as a means of diversifying types of housing and increasing the number of residents who own property.</p>	<p>The Proposed Project would provide a range of for sale and rental products within a variety of product types (i.e., single-family attached and detached units, stand alone multi-family developments and mixed-use multi-family developments).</p>

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Promote residential developments which will attract middle and upper income families who can afford the higher cost of recycled development.</p>	<p>The Proposed Project would provide a range of for sale and rental products within a variety of product types (i.e., single-family attached and detached units, stand alone multi-family developments and mixed-use multi-family developments). As such, the Project would provide a range of housing to meet all income levels, including middle and upper income families.</p>
<p><i>Circulation</i></p>	
<p>Insure that proposed new uses can be accommodated by adequate and safe streets.</p>	<p>A traffic impact analysis has been prepared to ensure that the existing street system can accommodate the Proposed Project. The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. The Project Site would contain a network of streets and paseos that connect the parks and plazas with retail, entertainment, residential, office and civic uses. Project design features and Mitigation Measures have been designed to ensure that the Project would be consistent with this objective (see Section IV.L, Traffic/Transportation of the Draft EIR).</p>
<p>Promote and support adequate public transportation within the City and the region.</p>	<p>The Proposed Project includes a mixed-use commercial and residential development in an area currently served by mass transportation services and facilities. Therefore, the Project would increase the development density at a strategic point for public transportation and would be consistent with this objective.</p>
<p>Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets.</p>	<p>The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. The Project Site would contain a network of streets and paseos that connect the parks and plazas with retail, entertainment, residential, office and civic uses.</p>

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.</p>	<p>The Proposed Project is a mixed-use community that will create open space, retail, entertainment, casino/gaming and civic opportunities for residents to walk and bike. All federal, state, and local requirements for handicap-accessibility will be met.</p>
<p align="center">Community Facilities</p>	
<p>Pursue the continued acquisition and development of parks and recreation facilities to the extent feasible within the City's budgetary capability.</p>	<p>The Proposed Project would fulfill the park and recreational needs of its residents by providing 25 acres of open space on the Project Site. This added open space would help alleviate the City's existing substandard provision of parkland and recreational facilities. Therefore, the Proposed Project would be consistent with this objective.</p>
<p>Maintain the present high level of police and fire services to the extent it is fiscally prudent.</p>	<p>The Project includes an on-site police substation in the mixed-use area of the Project Site. Furthermore, the Proposed Project would not be expected to impact fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LACoFD. Therefore, the Proposed Project would be consistent with this policy.</p>
<p>Encourage the retention of high quality library services.</p>	<p>The City's libraries believe that their current facilities can provide the same level of service to the additional population in the Project area. Development of the Project Site would result in additional tax revenue in the City of Inglewood that could be used to expand the existing computer workstations at the Inglewood Public Library. In addition, the Proposed Project includes a 4-acre site be dedicated for civic uses that the City could develop with a library, joint use school/library, or other public use to offset the increased demands upon the library services.</p>
<p>Expand opportunities for cultural and social growth for the City's residents.</p>	<p>The Proposed Project includes a 4-acre site be dedicated for civic uses that the City could develop as a school or library, which could be a source to foster cultural and social growth for the City.</p>
<p><i>Source: City of Inglewood General Plan: Land Use Element, January, 1980. Consistency analysis provided by Christopher A. Joseph & Associates.</i></p>	

Page IV. I-31 Under the subheading “*Competitive Retail Environment*” the following information is added to the end of the first paragraph:

“The Primary Trade Area (PTA) is bounded roughly by West Florence Avenue on the north, West El Segundo Boulevard on the south, the San Diego (405) freeway on the west and the Harbor (110) freeway on the east. This Primary Trade Area is further subdivided between PTA West and PTA East. Western Avenue is the dividing line between PTA West and PTA East. The area of the PTA to the west of Western Avenue is “PTA West” while the area of the PTA to the east of Western Avenue is “PTA East.””

Page IV. I-34: The second paragraph is modified to read as follows:

“There would be no change ~~substantial variation~~ in the Project’s street configurations or relationship to the surrounding community.”

Page IV.I-36: The following Project Design Feature will be provided to ensure proper notice is provided to the FAA prior to construction.

PDF I-3. The Applicant shall provide notice to the Federal Aviation Administration in accordance with the applicable requirements of Title 14, Part 77, Subpart B.

IV.J. PUBLIC UTILITIES

IV.J.1 WATER

No changes to this Section of the DEIR are required.

IV.J.2 WASTEWATER

Page IV.J-34: Wastewater Infrastructure, the second sentence in the first paragraph shall be amended as follows: The wastewater generated by the Proposed Project will be treated at the Joint Water Pollution Control Plant located in the City of Carson operated by the LACSD, which has a design capacity of ~~385-400~~-mgd and currently processes an average flow of ~~340.8~~ 303.3-mgd.

IV.J.3 ENERGY CONSERVATION

No changes to this Section of the DEIR are required.

IV.J.4 SOLID WASTE

Page IV.J-55 The first paragraph under the subheading “Operational Impacts” and Table IV.J-17 should be revised as follows:

“With respect to threshold (a), operation of the Proposed Project would cause an on-going generation of solid waste throughout the lifespan of the Project. Upon full occupancy, the Proposed Project’s residential and commercial uses would generate approximately ~~12,461~~ 11,861 net pounds (~~6.2~~ 5.9 tons) of solid waste per day, or approximately ~~2,263~~ 2,165 tons per year (see Table IV.J-17, Estimated Operational Solid Waste Generation by Proposed Project, below).”

**Table IV.J-17
Estimated Operational Solid Waste Generation by Proposed Project**

Land Use	Unit/Quantity	Generation Rate ^a (lbs/unit/day)	Total (Pounds/Day)
Existing Uses			
Main Building/Grandstand	594,000	.006	3,564
Pavilion ^b	280,000 <u>321,000</u>	.005	1,400 <u>2,000</u>
		Subtotal	4,964 <u>5,564</u>
Proposed Project			
Residential	2,995 units	4.00 lbs/unit/day	11,980
HOA Facility	10,000 sf	0.006 lbs/sf/day	60
Office/Commercial	75,000 sf	0.006 lbs/sf/day	450
Retail	620,000 sf	0.005 lbs/sf/day	3,100
Casino/OTB	120,000 sf	0.005 lbs/sf/day	600
Hotel			
Rooms	300 rooms	2.0 lbs/room/day	600
Meeting Space	20,000 sf	0.006 lbs/sf/day	120
Civic Use ^c	4 AC	0.007 lbs/sf/day	515
Open Space	25 AC	--	--
		Subtotal	17,425
		Net Total	12,461 <u>11,861</u>
^a Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table. ^b Does not include the Pavilion outdoor seating area which has been abandoned and is not in use. ^c Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, July 2007 <u>February 2009</u> .			

IV.J.5 STORM DRAINS (See Section IV.F)

No changes to this Section of the DEIR are required.

IV.K. PUBLIC SERVICES

IV.K.1. POLICE SERVICES

Page IV.K-1: Add the following text to the end of the first paragraph under the “Inglewood Police Department” subheading:

“The Beat 3 area (north of Century Boulevard and east of Prairie Avenue) consists of Council District 1 that currently serves approximately 29,541 persons (using the 2006 population census of 118,164 divided by four Beats or Council Districts). One part-time civilian and one Senior Lead Officer serve the Beat 3 Police Community Center and Beat 3, District 1 areas. Beat 3 areas are served 24/7 by either one assigned Patrol car or “wild” unit, as Patrol shifts dictate. Additionally this does not include several specialized Units, such as motors, 32 civilian special enforcement officers and anti-crime enforcement teams that serve the City at various times and days.”

IV.K.2. FIRE PROTECTION

Page IV.K-15: The third sentence of the first paragraph under the subheading Environmental Setting shall be revised as follows: “The LACoFD operates 9 divisions, 21 battalions, ~~165-169~~ fire stations and 10 fire suppression camps for 58 district cities and all unincorporated areas of within the County of Los Angeles.

Page IV.K-15: The second sentence of the first paragraph under the subheading Fire Stations on page IV.K-15 of the Draft EIR shall be revised as follows: “The Proposed Project is located within Division VI, Battalion 20 of the LACoFD’s jurisdiction. ~~As of March 2006,~~ Battalion 20 employed approximately ~~75-21~~ full-time daily staffing among the ~~five-four~~ Fire Stations within the City. Within Battalion 20 are six fire stations: Station 14, Station 18, Station 170, Station 171, Station 172, and Station 173. Fire Station 170 is located approximately ~~1.7 miles-1 mile~~ from the Project Site, Fire Station 171 is approximately ~~2.1~~ 1.5 miles, Fire Station 172 is approximately ~~1.7~~ 2 miles from the Project Site, and Fire Station 173 is located approximately ~~1.6~~ 0.75 miles from the Project Site (see Figure IV.K-2).”

Page IV.K-15: The second paragraph under the Fire Station subheading is revised as follows:

Fire Station No. 173 is located approximately ~~1.6~~ 0.75 miles from the Project Site (at 9001 South Crenshaw Boulevard) and would have primary response duties to calls from the Proposed Project. Fire Station No. 173 ~~is equipped with a 3-person engine company and 2-person paramedic squad~~ has an assessment light force consisting of a 4-person truck and a 2-person engine company responding as a unit, with one Fire Fighter paramedic on board and some limited paramedic capabilities. Fire Station No. 170, located at 10701 S. Crenshaw Boulevard, Fire Station No. 171, located at 141 W. Regent Street, and Fire Station No. 172, located at 810 Centinela Avenue, are all equipped with a

3-person engine company and 2-person paramedic squad, and would also respond to calls from the Proposed Project. ~~Although Station 18 is outside of City limits, it is equipped with a 4 person paramedic engine company and would be the closest unit available to service Inglewood if the need should arise.~~⁶

⁶~~6.7 Fire Services, City of Inglewood General Plan Update Technical Background Report, August 2006.~~

Page IV.K-17: The following sentences shall be added to the end of the paragraph under the Response Times subheading: “In 2007, Inglewood had an average emergency response time for first arriving units of 4.23 minutes. The average non-emergency response time for first arriving units was 6.2 minutes.”

Page IV.K.2-22: Under the Cumulative Impacts subheading, the last sentence of the first paragraph is revised as follows: “This need would be funded via existing mechanisms (i.e., property taxes, the City’s Annual fee, government funding), to which the Proposed Project and related projects would contribute.”

IV.K.3. SCHOOL SERVICES

No changes to this Section of the DEIR are required.

IV.K.4. PARKS AND RECREATION

No changes to this Section of the DEIR are required.

IV.K.5. LIBRARIES

No changes to this Section of the DEIR are required.

IV.L. TRAFFIC/TRANSPORTATION

In the course of the public comment process, several commenters raised questions concerning the traffic impact analysis in the Draft EIR. In response to those comments, an updated traffic analysis is provided in the Final EIR, and for comparative purposes, the traffic section from the Draft EIR (Section IV. L. Traffic/Transportation) has been reprinted in redline/strikethrough text to identify the changes using the updated analysis. Below is a summary of the changes made to the assumptions underlying the traffic analysis based on the comments received, and the results of the updated study.

1. Baseline traffic counts updated to reflect conditions when schools are in session and the racetrack is being used for live racing events—The baseline weekday traffic counts at fourteen study intersections located immediately adjacent to the Hollywood Park project site were taken in late June coinciding with live horse racing at the Racetrack, but without local schools being in session. In addition, weekday traffic counts for the remaining 52 study intersections were

conducted during September and October when all local schools were in session, but the track was not being utilized for racing. Consequently, the baseline data was adjusted to reflect the conditions in which both schools and live racing are assumed to be operating.

2. Additional study intersections—Supplemental evaluation was undertaken at additional intersections within the requested geographic boundaries which were not previously analyzed in the Draft EIR Traffic Impact Study. Specifically, the following seven intersections were evaluated for analysis of potentially significant traffic impacts related to the Project:
 - a. Inglewood Avenue and Florence Avenue
 - b. Inglewood Avenue and Manchester Boulevard
 - c. Inglewood Avenue and Hillcrest Boulevard
 - d. Grevillea Avenue and Arbor Vitae Street
 - e. Van Ness Avenue and Manchester Avenue
 - f. Van Ness Avenue and Arbor Vitae Street-92nd Street
 - g. Van Ness Avenue and Century Boulevard
3. Updated Related Projects for cumulative impacts analysis—The traffic impact analysis was updated to incorporate more current information with respect to two key related development projects in the immediate vicinity of the Project—the Inglewood Promenade Project (include as Related Project No. I-1 in the Draft EIR) and the Home Stretch Project (included as Related Project No. I-19 in the Draft EIR). An Initial Study for the Inglewood Promenade Project was recently prepared in August 2008. The Draft EIR assumed this project contained approximately 1.8 million square feet of retail based upon information provided by the developer to the City Planning Department prior to issuance of the NOP for this project. The Inglewood Promenade Project has since been refined, and as described in the August 2008 Initial Study, consists of approximately 650,000 square feet of retail floor area, approximately 900,000 square feet of office space, and a 300-room hotel. The updated traffic impact analysis uses the land use characteristics of the Inglewood Promenade Project as presented in the August 2008 Initial Study. In addition, the Home Stretch project was deleted from the list of related projects considered in the cumulative traffic impacts analysis. The Home Stretch Project was removed because it continues to remain inactive with no planning applications or project actions filed with the City of Inglewood during the past three years. It should be noted that for all other impact analyses, the related projects list used to calculate the cumulative impacts is the list originally provided in Section III of the Draft EIR, and therefore, it remains a conservative analysis as the cumulative development analyzed is much greater than what is currently expected.

4. Trip credit for existing live horseracing activity to be removed—The updated traffic impact analysis assumes an 85th percentile racetrack attendance event for developing the trip generation credits to be applied to the Project. The credit for existing racing use reflects the fact that racing traffic fluctuates considerably with time, seasons, and other factors. The credit taken represents a portion of the traffic that could be generated by the racetrack at full-capacity when racing is in session. Racing attendance varies greatly, so the credit was based on a review of long-term attendance records and an estimate of the trips associated solely with track attendance. Based on a review of the Hollywood Park racetrack attendance records from 2000 to 2006, the 85th percentile attendance represents approximately 8,700 weekday and 12,200 weekend attendees. The attendance levels assumed in the Draft EIR traffic study for the purpose of calculating trip generation credits associated with the live horseracing activity to be removed were 10,000 weekday attendees and 15,000 weekend attendees, which represents approximately the 90th percentile attendance. If attendance records from 1989 through 2006 are utilized, the 8,700 weekday attendance would represent a 65th percentile event.

5. Trip generation rates for calculating the horse racing credit—The three activities currently on the Project Site are the casino use, off-track betting and live horseracing. Because of the mix of uses currently on the Site, certain assumptions had to be made to determine the rate associated with each individual use since the casino and off-track betting uses will remain, but the live horseracing use will be removed as part of the Project. In response to comments raised on the trip generation rates for the horseracing credit, different methods were analyzed and compared to the information presented in the Draft EIR. One possible methodology derives a trip rate per attendee by taking trips associated with live racing/casino and subtracting trips associated with off-track betting/casino, averaging the rate over the spring and fall meets, to derive a trip rate associated with live racing only. This method produces a rate of 0.69 trips/attendee. The difficulty in directly using trip and attendance data from the current Hollywood Park operations is that the traffic counts also include trips related to the adjacent casino, and when racing is not in session patrons still come to the track for off-track betting. The alternative method that can be used for calculating the trip generation for the existing racetrack is the methodology used in the Draft EIR. In the Draft EIR, the methodology utilized to develop the trip generation for existing uses was based on driveway traffic counts conducted during events at the site with live racing and without live racing. As these driveway traffic counts included both the racetrack and the casino/off-track betting components, the first step to determine trip generation for the racetrack component involved isolating the racetrack traffic from the driveway counts. Next, a per racetrack attendee trip rate was derived. Using this method, a per attendee trip rate for the PM peak hour outbound direction was determined to be 0.32 outbound trips/attendee. This rate is about half of the rate derived from the alternative methodology, and represents a conservative assumption for a trip generation rate associated with live racing. Additional driveway traffic counts were conducted as during the “Without Live Racing” condition to further validate the assumptions in the Draft EIR.

6. Internal Circulation—An internal roadway segment analysis was conducted with average daily traffic (ADT) forecasts for each of the internal roadway street segments in the Project. The supplemental traffic assessment also provides a display of the proposed internal roadway classification by street type (i.e., minor arterials, collectors, local streets). This analysis shows that the internal street system can accommodate project traffic without significant impacts.
7. Added Project Improvement—In response to comments received from Los Angeles County, a project improvement has been added at the intersection of La Cienega Boulevard Northbound Ramp at Slauson Avenue. Using the City of Inglewood’s traffic impact analysis methodology (as the Lead Agency), the identified intersection is not cumulatively impacted by the Project. However, using the County’s traffic impact analysis methodology, the Project results in a cumulative impact at the identified intersection. The Project Applicant has agreed to provide the Project’s pro-rata share contribution toward the identified improvement measures, as recommended by the County of Los Angeles although this cumulative impact does not exist when using the Lead Agency’s methodology.
8. Pro-Rata Share Contribution for Cumulative impacts—The updated analysis shows that there will be fewer cumulative impacts when compared to the cumulative impacts presented in the Draft EIR traffic analysis. Nonetheless, the Project Applicant has agreed to provide its fair share contribution toward all the cumulative mitigation measures for the intersections originally identified in the Draft EIR to fully mitigate the impacts. In addition, the Project’s pro-rata share contribution to cumulative impacts has changed because of the changed assumptions in the updated traffic impact analysis. It should be noted that the Project Applicant has agreed to contribute the greater of the two fair share contribution percentages between the updated traffic impact analysis and the Draft EIR traffic analysis. For example, if the Draft EIR fair share contribution for a particular intersection was 2.4%, but the fair share contribution calculated using the updated traffic analysis was 1.9%, the Project Applicant would continue to contribute 2.4% to the intersection.
9. Acceleration of cumulative impact mitigation at Crenshaw Boulevard/Century Boulevard—On a project basis and a cumulative basis, the Project significantly impacts the intersection of Crenshaw Boulevard and Century Boulevard, and mitigation measures were identified in the Draft EIR. (See MM L-6 and MM L-43). As a result of the updated traffic analysis, some aspects of the cumulative mitigation identified for the Crenshaw/Century intersection have been accelerated to be included in the project mitigation measures so as to continue to mitigate the Project’s impact at this intersection to a less than significant level.

Overall, the effect of the updated traffic impact analysis prepared in response to comments raised to the Draft EIR was to (i) reduce the amount of the trip credit for the existing horseracing activity to be removed as part of the Project, (ii) update the cumulative impact analysis as a result of updating the list of related projects to reflect current conditions, (iii) expand the number of intersections studied, and (iv) impose fair share mitigation for cumulative impacts at the greater of the rate calculated in the Draft EIR

or the updated traffic impact analysis. Notwithstanding the changes in the assumptions underlying the traffic impact study as described above, no new project-related or cumulative impacts resulted.

IV.M. PARKING

This Section has been revised in its entirety and is included at the end of this Section. The revised Section IV.M, Parking is shown in redline/strikethrough text to call out the changes made to the text that appeared in the Draft EIR. At the time the Shared parking Study included in the Draft EIR was conducted, the precise mixed-use program for the Project Site was still under development, so a sample program was utilized in the analysis. Subsequently, the proposed mixed-use program was refined and certain land uses were removed from the sample program. The program included in this revised Section was updated to be consistent with the program include in Table IV.M-1 of the Draft EIR. In addition, based on comments received on the Draft EIR, the parking requirements for resident parking, guest/visitor parking, civic zone parking, tandem parking and valet parking have been further clarified. Notwithstanding, the revisions made to Section IV.M, no new project-related or cumulative impacts resulted.

V. GENERAL IMPACT CATEGORIES

Page V.A-1: Modify the text under the first bullet point as follows:

- “Project Construction Air Quality impacts involving:
 - Exceedance of regional thresholds for VOC, NO_x, PM_{2.5}, and PM₁₀; and
 - Exceedance of localized emissions of PM_{2.5}, PM₁₀, and NO₂.
 - Exceedance of toxic air contaminant threshold for diesel emissions resulting in a carcinogenic risk of 30 persons in one million.”

Page V.A-1: Modify the text under the second bullet point as follows:

- Project Operational Air Quality impacts involving:
 - Concurrent emissions that exceed the SCAQMD significance thresholds for VOC, NO_x, CO, PM_{2.5}, and PM₁₀; and
 - ~~Technical~~ Inconsistency with the Air Quality Management Plan.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

VIA. INTRODUCTION

No changes to this Section of the DEIR are required.

VI.B. NO PROJECT ALTERNATIVE

No changes to this Section of the DEIR are required.

VI.B.1. CONTINUATION OF EXISTING LAND USES

No changes to this Section of the DEIR are required.

**VI.B.2. REASONABLY FORSEEABLE FUTURE DEVELOPMENT
(FOOTBALL STADIUM/CASINO) ALTERNATIVE**

No changes to this Section of the DEIR are required.

**VI.B.3. REASONABLY FORSEEABLE FUTURE DEVELOPMENT
(CONVENTION CENTER/HOTEL/CASINO) ALTERNATIVE**

No changes to this Section of the DEIR are required.

VI.C. ALTERNATIVE RU 800

Page VI.C-13 The second sentence of the paragraph under the subheading “Solid Waste” should be corrected as follows:

“Based on an average construction debris factor of 4.48 4.38 lbs per sf for the dwelling units (assuming an average of 1,500 square feet per dwelling unit), this Alternative would generate approximately 2,628 tons of building construction debris.”

VI.D. ALTERNATIVE RU 1,000

No changes to this Section of the DEIR are required.

VI.E. ALTERNATIVE RU 3,500

No changes to this Section of the DEIR are required.

VI.F. MAXIMUM HOUSING ALTERNATIVE

No changes to this Section of the DEIR are required.

VI.G. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

No changes to this Section of the DEIR are required.

VII. BIBLIOGRAPHY

VII.A. REFERENCES AND PERSONS CONSULTED

No changes to this Section of the DEIR are required.

VII.B. PREPARERS OF THE EIR

No changes to this Section of the DEIR are required.

VII.C. ABBREVIATIONS AND ACRONYMS

No changes to this Section of the DEIR are required.

IV. ENVIRONMENTAL IMPACT ANALYSIS

C. GEOLOGY/SOILS

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

- Final Report – Geologic Investigation of The Potrero Fault, Hollywood Park, Inglewood, California, Geomatrix Consultants, Inc., dated ~~November~~ December 2005 (“Geomatrix 2005 Final Report”), and is included as Appendix C-1 to ~~this the~~ the Draft EIR;
- Memorandum re: Clarification of Points on Final Report – Geologic Investigation of the Portero Fault for Hollywood Park (Inglewood, CA) Project No. 10834, Geomatrix Consultants, Inc., dated July 5, 2007 (“Geomatrix 2007 Memorandum re Final Report”), and is included as Appendix C-1 to this Draft EIR;
- Geotechnical Evaluation for Environmental Impact Report, Proposed Residential and Commercial Development, Hollywood Park Redevelopment, Inglewood, California, Group Delta Consultants, Inc., dated ~~March-29~~ 30, 2007 (the “Geotechnical Report”), and is included as Appendix C-2 to this Draft EIR.

ENVIRONMENTAL SETTING

Existing Conditions

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

Geologic Conditions and Topography

The City of Inglewood is located within the Los Angeles basin area, at the southern edge of the Transverse Ranges geomorphic province, and near the northern boundary of the Peninsular Ranges geomorphic province (Yerkes et al. 1965). Most of the Transverse Ranges province is mountainous, including the San Gabriel and San Bernardino mountains to the east, and the Santa Monica Mountains to the north. The Peninsular Ranges geomorphic province is characterized by a series of northwest/southwest trending mountains, including the San Jacinto and Santa Rosa mountains, and faults

including the Newport-Inglewood Fault and the Whittier-Elsinore Fault. The San Andreas Fault is located approximately 45 miles northeast of Inglewood.

Most of the City is underlain by a thick (10,000 to 12,000 foot) section of Tertiary and Quaternary marine and continental sedimentary rocks deposited on an igneous metamorphic basement complex. The Tertiary rocks, consisting primarily of sandstone, silt-stone, and shale, are almost entirely of marine origin and range in age from Eocene to Pliocene. The Quaternary rocks consist of shallow marine sandstone and siltstone as well as continental siltstone, mudstone, and gravel.

The Southern California region is seismically active and commonly experiences strong groundshaking resulting from earthquakes along both known and previously unknown active faults. Active faults are defined as faults that have caused soil and strata displacement within the Holocene period (the last 10,000 years). Potentially active faults are faults that have experienced movement in the Quaternary period (last two million years), but not during the Holocene. Faults that have not experienced movement in the last two million years are generally considered inactive.

The City is underlain by a thick (10,000 to 12,000 feet) section of Tertiary and Quaternary marine and continental sedimentary rocks deposited on an igneous-metamorphic basement complex within the Los Angeles sedimentary basin. The Tertiary rocks, consisting primarily of sandstone, silt-stone, and shale, are almost entirely of marine origin and range in age from Eocene and Pliocene. The Quaternary rocks consist of shallow marine sandstone and siltstone and continental siltstone, mudstone, and gravels. The soil types within the City consist of alluvium. Generally, these soils offer poor resistance to ground shaking and can amplify some surface motion. According to the USGS, mean subsurface shear-wave velocities through Inglewood soils are calculated to be 350 to 375 meters per second which is relatively low (loose wet sand is 230 m/second while solid bedrock is over 1,600 m/sec). Lower subsurface shear-wave velocities signify a propensity for greater amplification of ground motion.

The Newport-Inglewood Fault Zone (NIFZ), sometimes referred to as the Newport Inglewood Zone of Deformation, is a zone of discontinuous folds and faults which stretch across the Los Angeles basin in a northwest-southeast direction from Beverly Hills to Newport Beach. The deformation along NIFZ has been caused by displacement in the basement rocks and the overlying 10,000 to 12,000 feet of softer Tertiary and Quaternary sediments. The marine and continental sedimentary rocks have been warped and faulted forming such hills as the Baldwin, Rosecrans, and Dominguez. Thus, the hills are judged to be very young. This structural zone is exemplified by the young age of sedimentary rocks involved in the deformation, the observed regional and local changes in surface elevation along and across the zone, and the abundance of earthquake epicenters over the last 60 years closely associated with this zone. This deformation is considered presently and potentially active.

In addition to the NIFZ, several additional active or potentially active faults are located in or nearby the City. The Newport-Inglewood fault extends through the City and runs parallel to the San Andreas system and lies partly under the Pacific Ocean. Several moderate earthquakes and numerous smaller shocks have

been recorded in proximity to the Newport-Inglewood zone and have originated on the deeper faults within the zone.

The Inglewood Fault, one component of the Newport-Inglewood fault, has been mapped through the Inglewood Civic Center, south of Centinela Creek, and is shown to similarly extend to the south of the Alquist-Priolo Zone map for the Inglewood Quadrangle. Another local component of the Newport-Inglewood Fault is the Townsite Fault which extends from its intersection with the Centinela Fault in the Centinela Creek, towards the southeast across the Hollywood Park racetrack, and extends approximately to Century Boulevard. The Portero Fault is a major local component of the Newport-Inglewood Fault and traverses the eastern portion of the City, in a northwest-southeast direction.

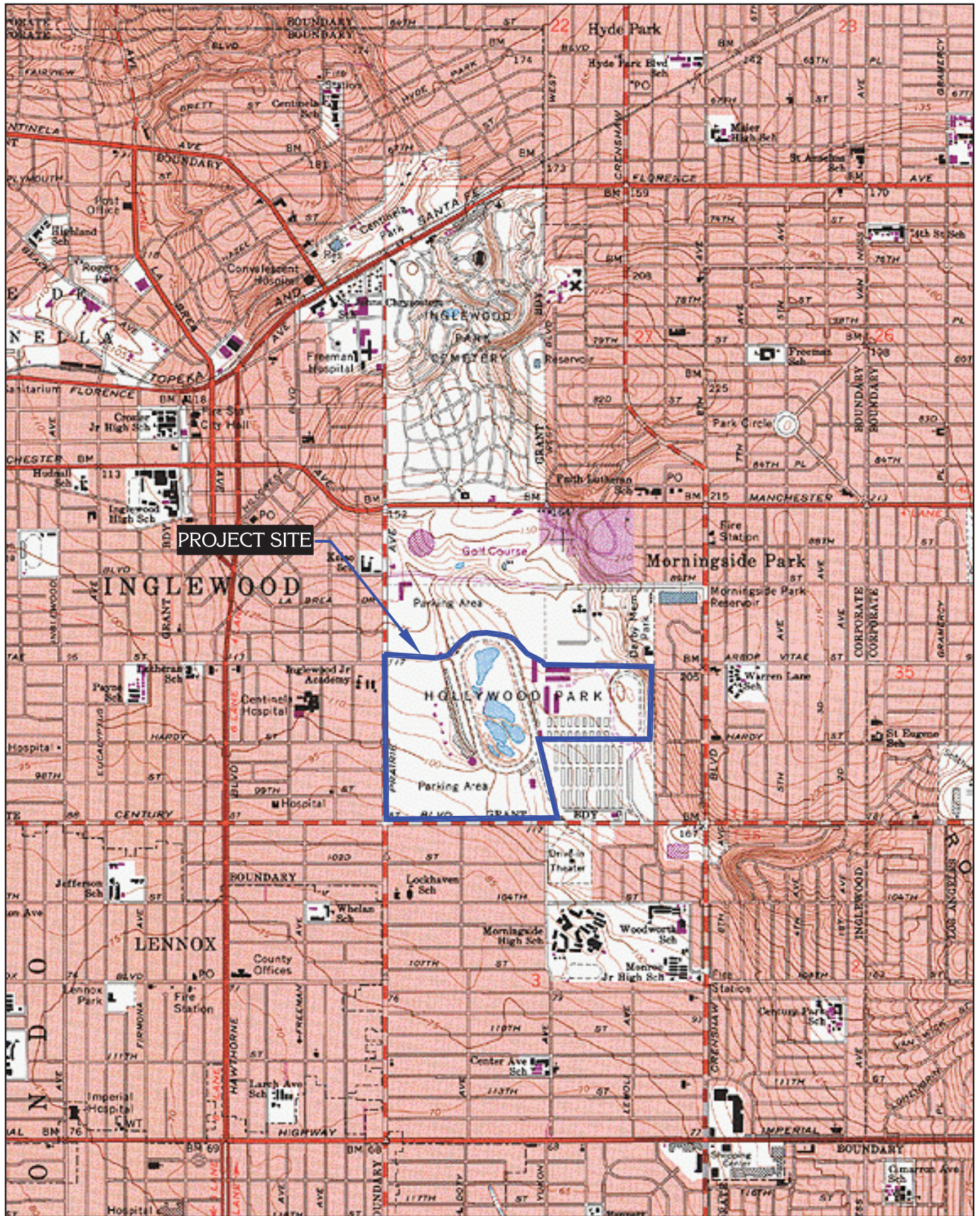
The Charnock and Overland Faults trends northwest-southeast and lies just west of the City boundary. Finally, the Transverse Faults consist of five northeast-southwest trending faults that cut or intersect the major northwest-southeast trending faults within the City limits. These faults are known from the north to the south as the Fairview, Centinela, Cemetery, Manchester, and Century Faults. Little geologic data is available on these faults, but they are believed to be secondary faults to the major northwest-southeast trending set which are parallel to the NIFZ.

The Project Site is located within the Rosecrans Hills physiographic region of Los Angeles County. It is located within the west Los Angeles shelf and is underlain by older alluvial deposits derived from the highlands to the north, generally consisting of interbedded layers of sands, gravels, silts and clays. To the north and to the west of the site, the subsurface soils consist of elevated terrace deposits, dominated by reddish-brown continental derived sands. The site is located north of the Baldwin Hills and on the west flanks of the Potrero Hills. These hills are the result of folding along the Newport Inglewood Fault Zone (NIFZ) during seismic and/or aseismic events, which formed domes that have trapped large accumulations of oil and gas. In general, the average surface topography of the Project Site rises across the property from the southwest Parking Area (approximately 106 feet above mean sea level [msl]) to the northeast Stables Area (approximately 150 feet above msl).¹ (See Figure IV.C-1, U.S.G.S Quadrangle Vicinity Map, and Figure IV.C-1 [[REVISED]], Regional Fault Map).

Subsurface Soil Conditions

The Project Site is located north of the Baldwin Hills on the west flanks of the Potrero Hills. Ground surface and subsurface conditions on the site are characterized as follows. The west portion of the Project Site is currently used as asphalt paved parking lots. The surface elevation within the west portion of the Project Site ranges from 120 to 92 feet above msl (north to south). The middle portion of the Project Site

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

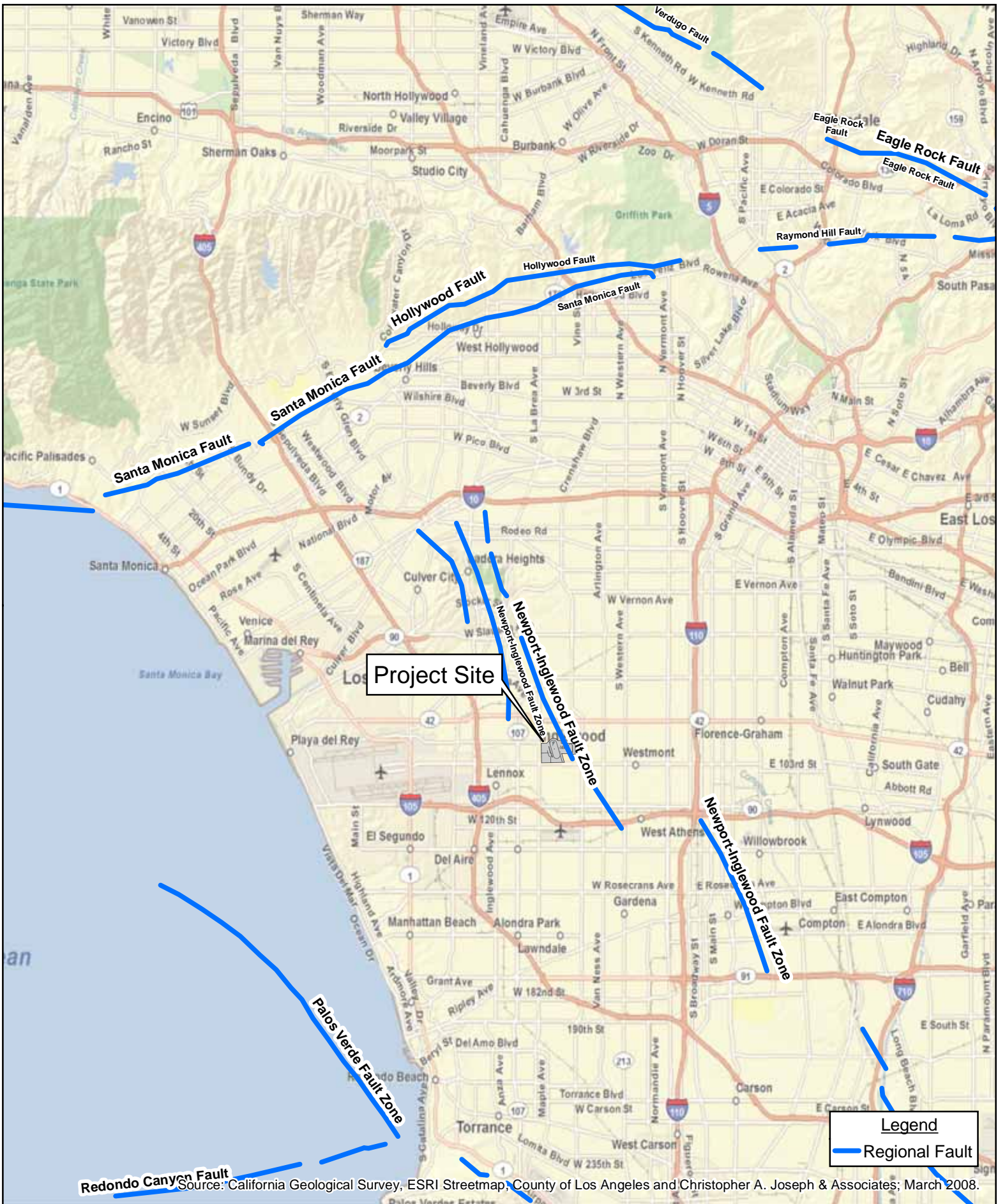


Source: Group Delta Consultants Inc., 11/30/06.



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Figure IV.C-1
USGS Quadrangle Vicinity Map



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

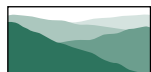
Subsurface conditions were evaluated by Group Delta Consultants, Inc., between September 18, 2006 and October 5, 2006 by drilling 11 borings on the Project Site to depths of 51.0 to 76.5 feet below ground surface (bgs).² Figure IV.C-2 on page ~~IV.C-4~~ IV.C-6 shows the locations of borings B-1 through B-11. Based on past site usage, current site grade, and soil condition encountered during field explorations, the Project Site was divided into three areas: (1) the “Parking Area” on the west; (2) the “Track Area” in the middle; and, (3) the “Barn Area” on the east side. In general, the subject site is underlain by interbedded silty clay and fine grained silty sand. Generalized geotechnical cross-sections through the existing site (Cross-Section A-A’ through C-C’) are presented in Figure IV.C-3 through Figure IV.C-5. Detailed soil layering for these three areas is discussed below.

The subsurface soils at the Parking Area consist of materials that are presumed to be fill, as well as stiff clay and dense sand. As depicted in Figure IV.C-3, Cross-Section of Geologic/Hydrologic Boring A-A’, soils encountered during borings drilled within the Parking Area are characterized in three distinct layers. The first of the three layers is presumed to be fill, and was encountered during the field exploration at depths of 3 to 7 feet bgs. The fill consists predominantly of clay and silt with sand. Based on the spacing distance between exploration locations (approximately 600 feet), Group Delta Consultants concluded that old fill could exist anywhere on the site, and could be locally deeper. The second of the three soil layers encountered at the Parking Area is stiff clay and silt with sand.

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

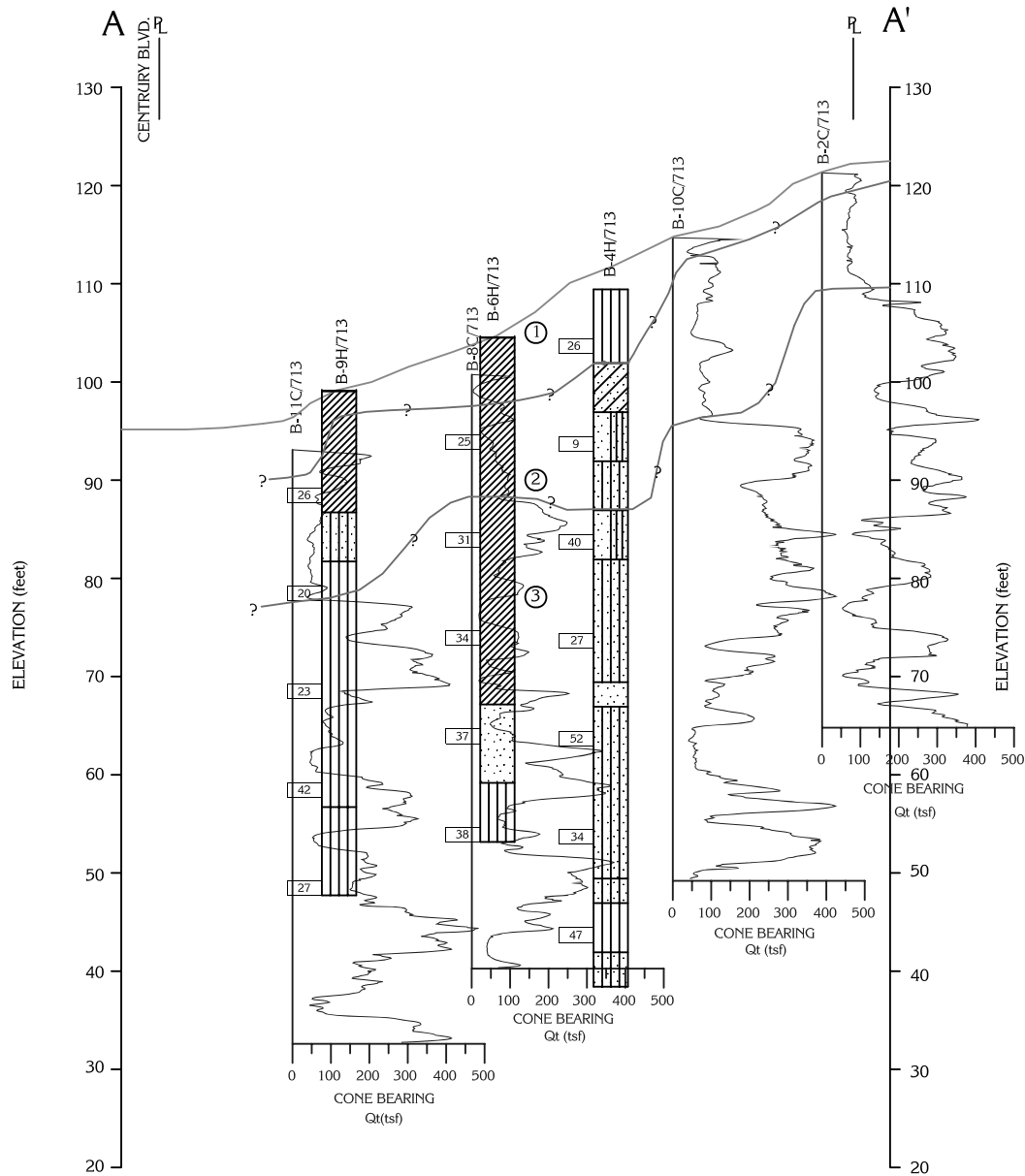


Source: Group Delta Consultants, Inc., 12/11/06.



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Figure IV.C-2
Locations of Geologic/Hydrologic Borings



Legend

- 18 Standard Penetration Test (SPT) N-Value
- Interpreted Layer Boundary

NOTES:

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

SOIL LAYERS

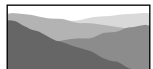
- ① Likely Fill
- ② Stiff Clay with Sand
- ③ Interbedded dense Sand with stiff Clay

SCALE (feet)

V: 1" = 20'

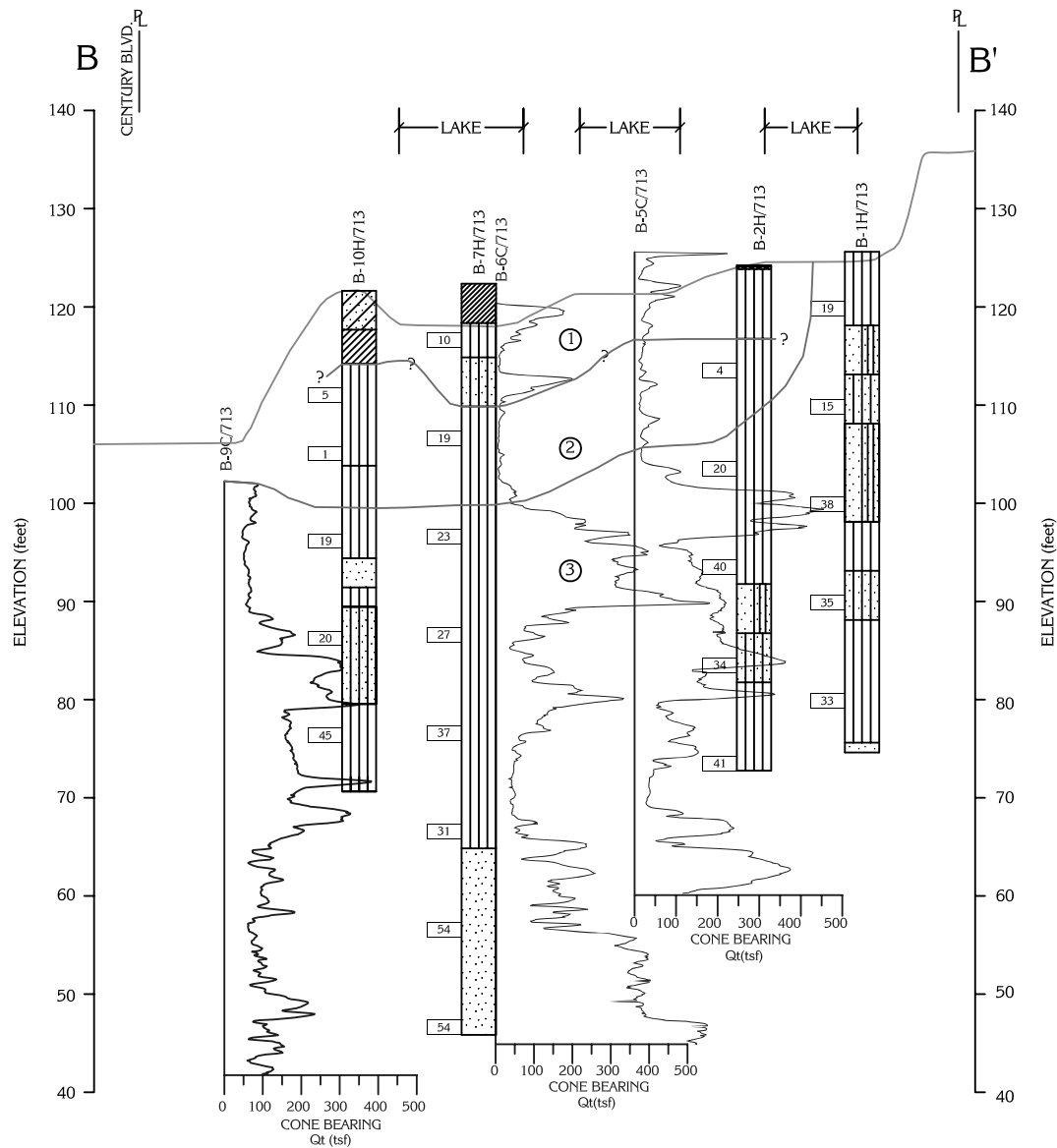
H: 1" = Approx. 760'

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



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



Legend

18 Standard Penetration Test (SPT) N-Value

NOTES:

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

SOIL LAYERS

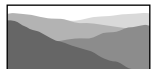
- ① Likely Fill
- ② Soft Clay
- ③ Interbedded dense Sand with Clay

SCALE (feet)

V: 1" = 20'

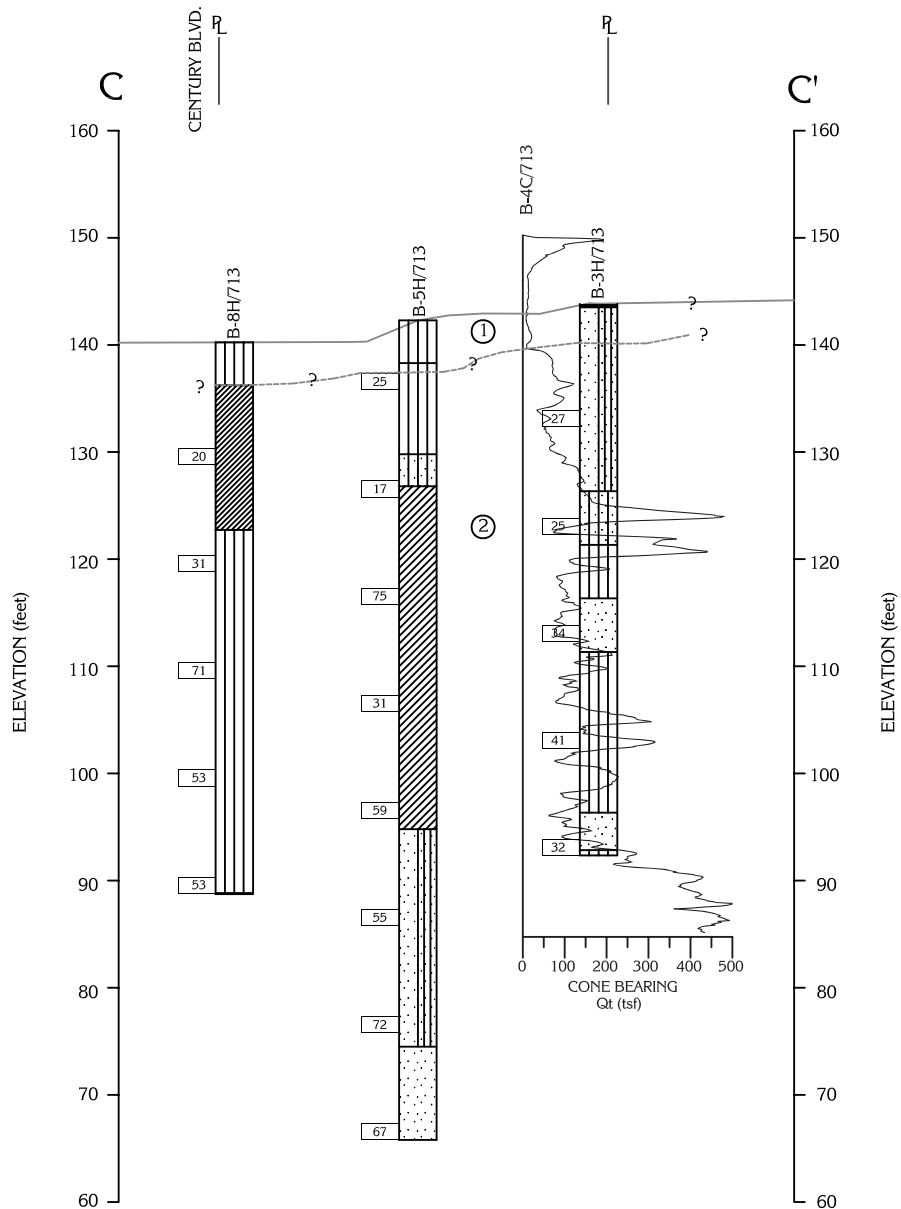
H: 1" = Approx. 760'

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



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



Legend

18 Standard Penetration Test (SPT) N-Value

NOTES:

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

SOIL LAYERS

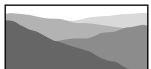
- ① Likely Fill
- ② Stiff Clay interbedded with Sand

SCALE (feet)

V: 1" = 20'

H: 1" = Approx. 760'

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



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.C-5
Cross-Section of Geologic/Hydrologic Boring C-C'

This layer is about 10- to 15-feet thick, extending from the bottom of the fill layer to depths between approximately 78 and 108 feet above msl (south to north across Parking Area). The third of the three soil layers is dense sand, stiff clay and silt. This layer extends to the maximum depth of 75 feet bgs explored. The soils in this layer consist predominantly of interbedded layers of sand, silty clay and silts. The sand is in general described as dense and very dense.

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

The subsurface soils at the Barn Area consist predominantly of material presumed to be fill, as well as stiff clay and dense sand. As depicted in Figure IV.C-5, Cross-Section of Geologic/Hydrologic Boring C-C', soils encountered during borings drilled within the Barn Area are characterized in two distinct layers. The first is presumed to be fill, and was encountered during the field exploration at depths of up to 4.5 feet bgs. The fill consists predominantly of silty clay and clayey silt with sand. Based on research, fill materials were noted by Group Delta Consultants to have been encountered at depths between approximately 4 to 7 feet bgs during the 1974 and 1991 field explorations for individual stables. As such, Group Delta Consultants noted the possibility of old fill to exist anywhere on the site, and that it could be locally deeper. The second layer of soil at the Barn Area is silty clay and clayey silts with sand. This layer extends from the bottom of the second layer to the maximum explored depth of 75 feet bgs. The clay is generally described as very stiff to hard. At a depth of 50 feet bgs, a very dense sand layer was encountered in some of the exploration locations. Porous material was also encountered in Group Delta Consultants field exploration in the Barn Area. Soil samples taken at depths between 0 and 5 feet bgs showed a collapse potential of up to 5%. One sample at 9 to 10 feet bgs showed a collapse potential of 3%. Group Delta Consultants noted that a collapse potential could exist in the Barn Area soils, which would need to be evaluated in building specific site investigations.

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

Groundwater

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

The abrupt change in groundwater elevations on the Project Site may be due to the occurrence of faults in the subsurface that influence groundwater flow. In the northeast portion of the Project Site, the calculated groundwater gradient appears to trend to the southwest, which is not consistent with the previously reported predominant southeasterly groundwater gradient direction for this area. It is possible that the estimated southwesterly groundwater gradient direction is limited in extent (i.e., the gradient shifts to a more southeasterly direction south of the stables) or is not generally representative of groundwater gradient directions measured at other times of the year. (EKI, 2007).

Liquefaction

Liquefaction involves the sudden loss in strength of a saturated, cohesionless soil (predominantly sand) caused by the build-up of pore water pressure during cyclic loading, such as that produced by an earthquake. This increase in pore water pressure can temporarily transform the soil into a fluid mass, resulting in vertical settlement, and can also cause lateral ground deformations. Typically, liquefaction

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

occurs in areas where there are loose sands and the depth to groundwater is less than 50 feet from the surface. Seismic shaking can also cause soil compaction and ground settlement without liquefaction occurring, including settlement of dry sands above the water table.

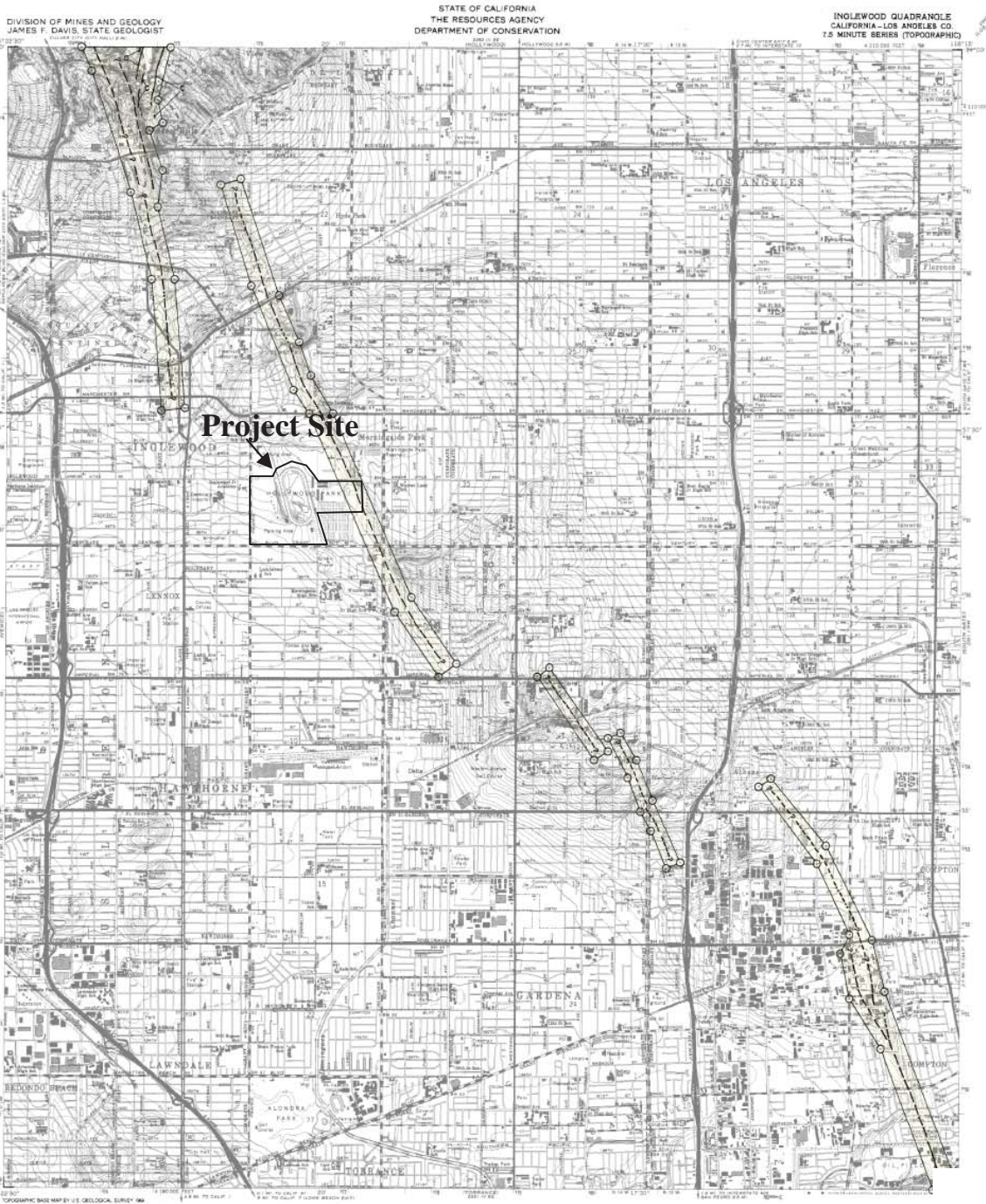
The Project Site is not located within a State of California Liquefaction Hazard Zone (CDMG 1998). As stated above, groundwater was not encountered in any of the borings, which extended to a maximum depth of 75 feet. However, groundwater was encountered at depths ranging from approximately 70 to 180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

Seismic Conditions

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

The Potrero fault, a strand of the Newport-Inglewood fault zone, crosses a portion of the Project Site and is considered to be an active fault. A fault trenching program was conducted by Geomatrix (2005) to investigate the boundaries of the Potrero Fault within the Project Site. To identify the boundaries of the Potrero fault across the Project Site, Geomatrix delineated a Restricted Use Zone (RUZ) based on the conclusions of the fault trenching program. This RUZ is located across the northeastern portion of the Training Track, as shown in Figure IV.C-7. The alignment of the RUZ is located approximately 300 feet further to the northeast than the alignment of the fault zone boundary shown on the Alquist-Priolo Special Studies Zone Maps (Inglewood Quadrangle). This finding of a northeasterly shift in the alignment of the fault zone boundary was also concluded by Kenneth Osborne and Associates in their 1989 geotechnical report prepared for the Renaissance residential project (located immediately to the north of the Training Track). Specifically, Osborne concluded on page 9 of this report that “(t)he fault zone...occurs about 120 feet northeast of previously mapped traces (Poland and others, 1959; and Bryant, 1988).”⁴

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



STATE OF CALIFORNIA
 THE RESOURCES AGENCY
 DEPARTMENT OF CONSERVATION

INGLEWOOD QUADRANGLE
 CALIFORNIA-LOS ANGELES CO.
 7.5 MINUTE SERIES (TOPOGRAPHIC)

SCALE 1:24,000

1 0 1000 2000 3000 4000 5000 6000 7000 FEET
 0 1 2 3 4 KILOMETER

CONTOUR INTERVAL 5 FEET
 NATIONAL MEGNETIC VERTICAL DATUM OF 1985

MAP EXPLANATION

Potentially Active Faults

Faults considered to have been active during Holocene time and to have a relatively high potential for surface rupture: solid line where accurately located; long dash where approximately located; short dash where inferred; dotted where concealed; query (?) indicates additional uncertainty. Evidence of historic offset indicated by year of earthquake-associated event or C for displacement caused by creep or possible creep.

Special Studies Zone Boundaries

These are delineated as straight-line segments that connect circled turning points so as to define special studies zone segments.

Seaward projection of zone boundary.

**STATE OF CALIFORNIA
 SPECIAL STUDIES ZONES**

Revised in compliance with
 Chapter 13, Division 2 of the California Public Resources Code
 (Amended Special Studies Zones Act)

INGLEWOOD QUADRANGLE
REVISED OFFICIAL MAP
 Effective: July 1, 1986

James F. Davis State Geologist

REFERENCES USED TO COMPILE FAULT DATA

Topographic quadrangle

1. STATE GEOLOGICAL SURVEY, NATIONAL GEODETIC TRIANGULATION DATA, LOS ANGELES QUADRANGLE, CALIFORNIA, DIVISION OF MINES AND GEOLOGY, FAULT INVESTIGATION REPORT 196-73 (unpublished).

2. UNITED STATES GEOLOGICAL SURVEY, 1974, REPORT OF THE CALIFORNIA STATE GEOLOGIST, CALIFORNIA STATE GEOLOGICAL SURVEY PROFESSIONAL PAPER 682, 10 p. (part of scale 1:250,000).

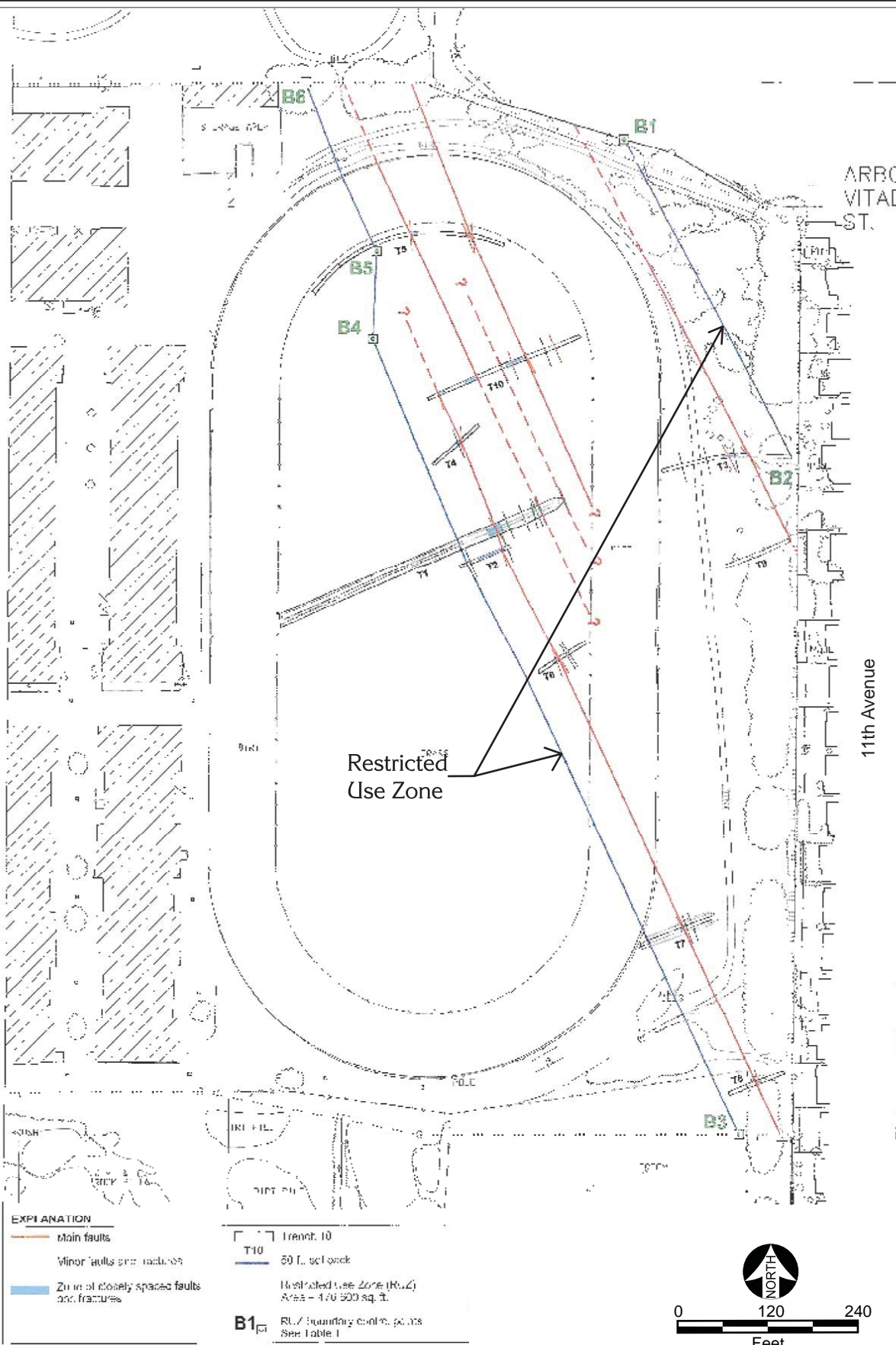
3. BULL, K. and SHANNON, D.C., 1964, GEOTECHNICAL FAULT INVESTIGATION AT 20000' (1000' TO 1500' DEPTH) ALONG THE INGLEWOOD QUADRANGLE, DIVISION OF MINES AND GEOLOGY, CALIFORNIA STATE GEOLOGICAL SURVEY PROFESSIONAL PAPER 682, 10 p. (part of scale 1:250,000).

4. CALIFORNIA STATE GEOLOGICAL SURVEY, 1974, REPORT OF THE CALIFORNIA STATE GEOLOGIST, CALIFORNIA STATE GEOLOGICAL SURVEY PROFESSIONAL PAPER 682, 10 p. (part of scale 1:250,000).

IMPORTANT - PLEASE NOTE

- 1) This map may not show all faults that have the potential for surface fault rupture, either within the special studies zones or outside their boundaries.
- 2) Faults shown are the basis for establishing the boundaries of the special studies zones. The identification and location of these faults are based on the best available data. However, the quality of data used is varied. Tracks have been drawn as accurately as possible at this map scale.
- 3) Fault information on this map is not sufficient to serve as a substitute for the geologic site investigator's (local studies) required under Chapter 7.5 of Division 2 of the California Public Resources Code.

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



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



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

Regulatory Setting

State of California

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Section 2621) (the "Alquist-Priolo Act") was enacted by the State of California in 1972 to address the hazards of surface faulting to structures for human occupancy. The Alquist-Priolo Act was enacted in response to the 1971 San Fernando earthquake, which was associated with extensive surface fault ruptures that damaged numerous homes, commercial buildings, and other structures. The Alquist-Priolo Earthquake Fault Zoning Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards.

The Alquist-Priolo Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults and to issue appropriate maps. ("Earthquake Fault Zones" were called "Special Studies Zones" prior to January 1, 1994.) The maps are distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction.

Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet). However, only those potentially active faults that have a relatively high potential for ground rupture

⁵ Formerly known as the "California Division of Mines and Geology."

are identified as fault zones. Therefore, not all faults termed “potentially active” by the CGS are zoned under the Alquist-Priolo Act. A licensed geologist must prepare an evaluation and written report of a specific site.

The Portero fault, a strand of the Newport-Inglewood fault zone, crosses a portion of the Project Site and is considered to be an active fault.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act (SHMA) of 1990 (Public Resources Code, Chapter 7.8, Section 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to earthquake hazards of liquefaction, earthquake-induced landslides and amplified ground shaking. The purpose of the SHMA is to reduce the threat to public safety and to minimize the loss of life and property by identifying and mitigating these seismic hazards. The SHMA was passed by the legislature following the 1989 Loma Prieta earthquake.

Staff geologists in the Seismic Hazard Mapping Program (Program) gather existing geological, geophysical and geotechnical data from numerous sources to compile the Seismic Hazard Zone Maps. They integrate and interpret these data regionally in order to evaluate the severity of the seismic hazards and designate Zones of Required Investigation for areas prone to liquefaction and earthquake-induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes.

The SHMA requires site-specific geotechnical investigations be conducted identifying the seismic hazard and formulating mitigation measures prior to permitting most developments designed for human occupancy within the Zones of Required Investigation.

Development, Regulation, and Conservation of Oil and Gas Resources (CCR Title 14, Division 2, Chapter 4)

Title 14, Division 2, Chapter 4 of the California Code of Regulations sets forth the rules and regulations governing the environmental protection program of the Division of Oil, Gas, and Geothermal Resources (DOGR) as provided for in Section 3106 of Division 3 of the Public Resources Code. DOGR oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells. The regulatory program emphasizes the wise development of oil, natural gas, and geothermal resources in the state through sound engineering practices that protect the environment, prevent pollution, and ensure public safety.

Within the City, oil is the only extractable resource known to exist with the possible associated presence of natural gas. The City straddles a line of oil deposits that generally runs southeast to northwest from the Rosecrans Hills to the Baldwin Hills, paralleling the Newport-Inglewood Fault Zone. Oil production, in terms of the number of wells, was greater in previous decades although substantial oil extraction still

occurs in the Baldwin Hills. Within the City, there is only one remaining active oil well site, the seven-acre Brea Oil Company site at Eucalyptus Avenue and Hyde Park Boulevard. Previously, a small site operated in what is now the north parking lot at Hollywood Park. It was closed in 1997.⁶

General Dewatering Permit

As discussed in further detail on Page IV. F-11 in Section IV. F. Hydrology/Water Quality, the Los Angeles Regional Water Quality Control Board (LARWQCB) has issued a General NPDES Permit and General Waste Discharge Requirements (WDRs) governing construction-related dewatering discharges within the project development areas (General Dewatering Permit). This permit addresses discharges from temporary dewatering operations associated with construction and permanent dewatering operations associated with development. The discharge requirements include provisions mandating notification, sampling and analysis, and reporting of dewatering and testing-related discharges. The General - Dewatering Permit authorizes such construction-related activities so long as all conditions of the permit are fulfilled.

The impacts of the Regional Water Quality Control Board requirements are discussed in Section IV. F. Hydrology/Water Quality.

City of Inglewood

General Plan Safety Element

The City's General Plan Safety Element, which was adopted in July 1995, describes the existing conditions pertaining to the health and safety of Inglewood. This Element addresses public safety risks due to natural disasters including seismic hazards and geologic conditions, as well as sets forth the geology and fault lines map which depicts the two major faults in the City.

Inglewood Municipal Code

Earthwork activities, including grading, are governed by the "Building Code of and for the City of Inglewood" in the Inglewood Municipal Code. The Building Code is found in Article 2, Chapter 11. In accordance with the procedure designated in Sections 50001 et seq., of the Government Code of the State of California, and subject to particular additions, deletions and amendments set forth in the IMC, the IMC adopts by reference the "California Building Code, 2001 Edition," Volumes 1, 2, based on the Uniform Building Code, 1997 Edition as the "Building Code of and for the City of Inglewood."

The Uniform Building Code (UBC), published by the International Conference of Building Officials, forms the basis of about half the state building codes in the United States, including California's, and has

⁶ General Plan Technical Update

been adopted by the State legislature together with Additions, Amendments, and Repeals to address the specific building conditions and structural requirements in California. California Code of Regulations (CCR), Title 24, Part 2, the California Building Code, provides minimum standards for building design in the state, consistent with or more stringent than UBC requirements. Local codes are permitted to be more restrictive than Title 24, but are required to be no less restrictive.

Chapter 16 of the California Building Code deals with General Design Requirements, including, but not limited to, regulations governing seismically resistant construction (Chapter 16, Division IV) and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Chapters 18 and A33 deal with site demolition, excavations, foundations, retaining walls, and grading, including (but not limited to) requirements for seismically resistant design, foundation investigations, stable cut and fill slopes, and drainage and erosion control. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in Cal-OSHA regulations (CCR, Title 8).

Among other things, the CBC defines different building regions in the state and ranks them according to their seismic hazard potential. There are four types of these regions: Seismic Zones 1 through 4, with Zone 1 having the least seismic potential and Zone 4 having the highest seismic potential. Southern California is in Seismic Zone 4, thus any future development on the Project Site would be required to comply with all design standards applicable to Seismic Zone 4, the most stringent in the state.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

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

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

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- d) Be located on expansive soil, as defined in Table 18-1-~~B~~-A of the Uniform Building Code (~~1994~~2001), creating substantial risks to life or property?
- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Impacts Determined to be Less Than Significant

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

Project Impacts

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

Seismic Hazards

Fault Rupture

As discussed in the "Existing Setting" section, ~~The~~ the Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Inglewood. The Potrero Fault is an active surface fault trace that crosses a portion of the Proposed Project Site. It has been identified by the State and delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. The fault trenching program conducted by Geomatrix included mapping a RUZ for the Potrero Fault, which crosses the northeastern most portion of the Proposed Project. Therefore, the possibility of surface fault rupture affecting the proposed development exists. However, the Proposed Project would include development of open space and recreational areas within the RUZ, consistent with the recommendations of the Geomatrix report which identify the RUZ area as unsuitable for the construction of most structures for human occupancy, but useable for construction of recreational type development (e.g., storage facilities, recreational facilities, greenbelts, parking areas and roads). Structures intended for human occupancy, as further explained in the Geomatrix 2007 Memorandum re Final Report included in

Appendix C-1 to this Draft EIR, are not proposed within the mapped RUZ area. In the Geomatrix 2007 Memorandum re Final Report, Geomatrix stated that the following uses/facilities/structures are suitable in the RUZ:

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

Any suitable structures placed within the RUZ would be required to incorporate appropriate engineering design to mitigate movement resulting from potential future displacement related to the Potrero Fault. In addition, the Geomatrix 2005 Final Report concluded that the western part of the RUZ is outside the zone

of deformation associated with the Potrero Fault Zone, and that the potential for surface fault rupture to the west of the RUZ is considered to be negligible. No land use restrictions were identified for the Proposed Project Site outside of the RUZ. Thus, impacts on the Proposed Project Site from any surface fault rupture would be less than significant.

Seismic-Induced Ground Shaking

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

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

Seismic-Induced Settlement and Liquefaction

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

Landslides

The Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. As discussed above, the Project Site ranges from an average elevation of approximately 150 feet above msl to 106 feet above msl (from north to south). The Project site is not located within a City-designated landslide area or an area identified as

subject to seismic slope instability. Due to the relatively flat topography of the Project Site and surrounding area, potential impacts associated with landslides would be less than significant.

Erosion and Topsoil

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

Expansive Soils

The upper clayey soils on the Project Site are expansive and should not be used within two feet of the bottom of pavement or other flatwork. The Project would be required to comply with applicable provisions of the California Building Code as adopted by the Inglewood Municipal Code with regard to soil hazard-related design. With adherence to this regulatory framework, ~~Nonetheless, with adherence to the geotechnical engineering recommendations provided in the Geotechnical Report, and implementation of the mitigation measures identified in this Section,~~ impacts with respect to expansive soils would be less than significant.

Site Preparation/Grading/Earth Removal

This analysis addresses the impacts related to unstable soils as a result of collapse, subsidence, differential settlement, lateral spreading, or heaving associated with unstable geologic units or soils. Impacts related to landslide and liquefaction are discussed above. Using unsuitable materials for fill and foundation support or improperly compacting fill soils during site grading would have the potential to result in a significant impact due to potential future heaving, subsidence, spreading, or collapse problems leading to building settlement.

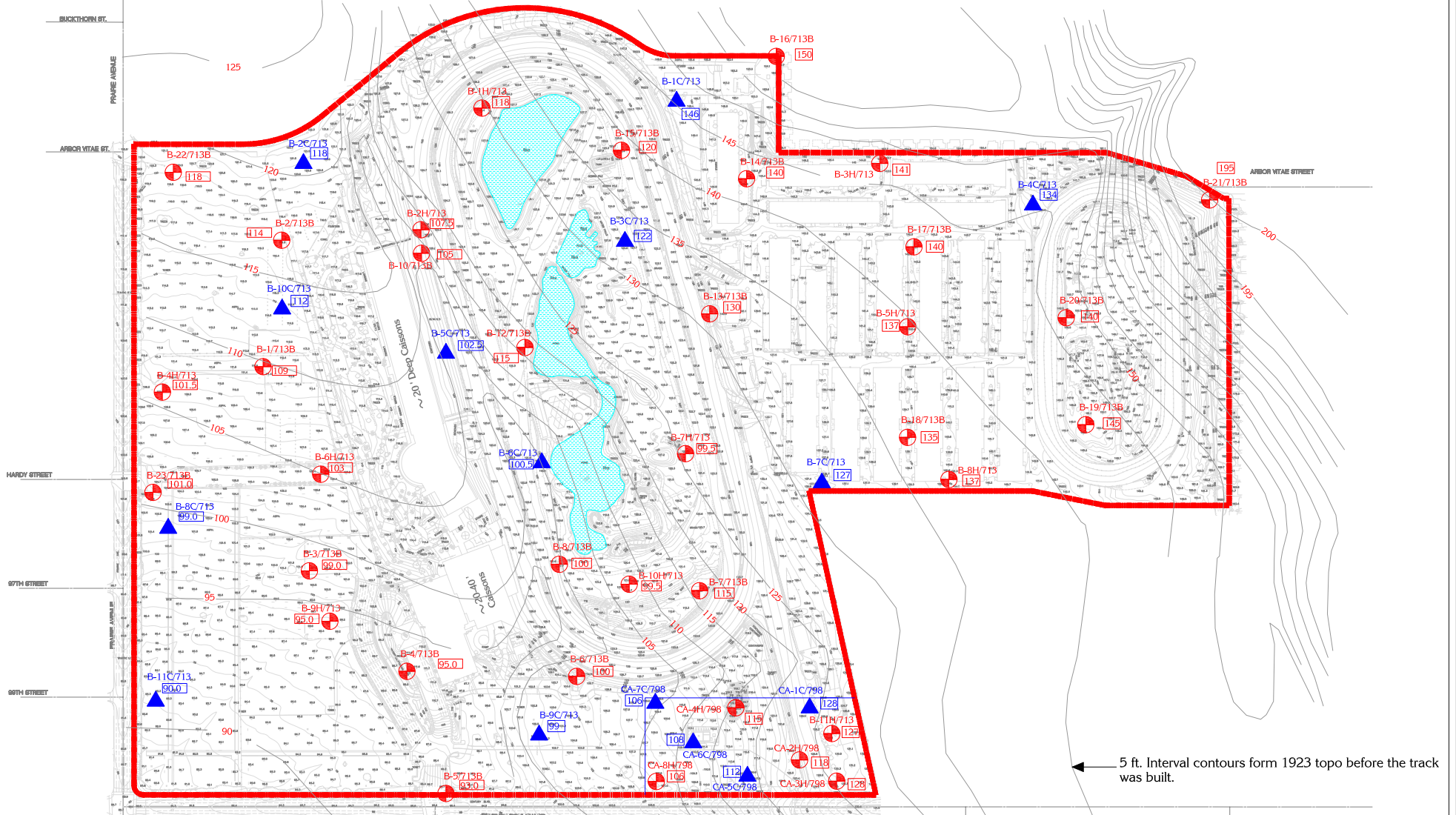
The proposed maximum limit of soils removal across the Project site is shown in Figure IV.C-8, Estimated Bottom Elevation of Removal. This Figure identifies the estimated bottom elevation of soils removal at the exploration locations (soil boring sites), as overlaid on the preliminary rough grading plan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

Prior to the start of grading, demolition will be required to remove any existing improvements, including pavement and structures. The Grandstand and Club house are supported by 22 to 40 feet deep reinforced caisson foundations. There are 6 known oil wells on the subject site. Discussion of abandonment of existing oil wells is presented in Section IV.D, Hazardous Materials/Risk of Upset. It should be anticipated that the buried remnants of previous construction could be encountered anywhere on the site, including foundations, walls, slabs, basements, mud pits, cesspools, tanks and utilities. As shown in Table IV.C-1, the estimated soil removals will involve excavating 3 to 7.5 feet bgs of on-site soils within the Parking Area, 3 to 22.5 feet bgs of on-site soils within the Main Track area, and 3 to 16 feet bgs of on-site soils within the Barn Area. It should be recognized that removals could be locally deeper depending on the actual conditions encountered in grading and the actual finished grade. Based upon soil conditions, grading conditions could go deeper without any significant impacts.

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

Geologic Hazards

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



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

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

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

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

Groundwater

Groundwater was not encountered during GDC's field exploration, to the maximum of 75 feet explored. However, groundwater was encountered by EKI, Inc. during subsurface investigations on the Project site between 70 to 170 feet below ground surface (bgs). Specifically, averaged recorded data by EKI Inc. suggest that groundwater on the Project site ranges between 95 feet bgs in the Parking Area, to 123 feet bgs in the Main Track Area, to 180 feet bgs in the Stables Area. As shown in Table IV.C-1, the proposed soils removal in the Parking Area ranges between 3 and 7.5 feet bgs. In the Track Area, proposed soils removal ranges between 3 and 22.5 feet bgs, and in the Barn Area, proposed soils removal ranges between 3 and 16 feet bgs. Thus, the maximum proposed depth of soils removal is 22.5 feet bgs, well above the shallowest recorded depth to groundwater of 72.45 feet bgs⁷ encountered by EKI Inc. during groundwater investigations conducted on the Project site. Therefore, groundwater is not likely to be encountered within the depth of proposed excavation.

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

Land Use Equivalency Program

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

The exchange of retail, office/commercial and hotel development for residential, retail, office/commercial and hotel development would be accomplished within the same building parameters, and would occur at relatively limited locations within the Project Site. Under the Equivalency Program, there would be no

⁷ Erler and Kalinowski, (Grab Groundwater Sampling Location PS-GW-4, Figure 5), October 2006.

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

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

CUMULATIVE IMPACTS

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

PROJECT DESIGN FEATURES

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

PDF C-1. Development of open space and recreational areas within the RUZ, as delineated in the Geomatrix 2007 Memorandum re Final Report (included in Appendix C-1 to this Draft EIR), shall be consistent with the recommendations of the Geomatrix report which identify the RUZ area as unsuitable for the construction of most structures for human occupancy, but

useable for construction of recreational type development (e.g., storage facilities, recreational facilities, greenbelts, parking areas and roads). Structures intended for human occupancy shall not be constructed within the mapped RUZ area. The following uses/facilities/structures are suitable in the RUZ: swimming pool and jacuzzi, tot lots, picnic facilities, meditation gardens, children's playground, fireplace and lounge areas, dog parks, exercise stations (parcourse), parking spaces at ground level (including covered parking), utility routes, both above and below ground, tennis courts, basketball courts, soccer fields and other open sports fields (volleyball courts, football play areas, etc.), game tables and seating areas in the open, restrooms, locker rooms, changing rooms (e.g., pool cabana), pool equipment rooms, storage lockers, entry pavilions, covered walkways (e.g. pergola and trellis), fences, and retaining walls.

MITIGATION MEASURES

Code-Required Measure

MM C-1. All buildings and structures shall be designed and constructed in conformance with the applicable regulations and standards of the latest edition of the Inglewood Building Division pursuant to the latest edition of the California Building Code, Los Angeles County Fire Code, seismic design standards, and applicable state requirements which are in effect at the time of building permit issuance.

Project-Specific Mitigation Measures

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

MM C-2. Prior to the start of grading, demolition will be required to remove any existing improvements, including pavement and structures. Any void created from the demolition should be properly backfilled to the limits determined by the project geotechnical engineer. Any soils loosened or disturbed during the demolition should also be removed. The existing old wells may also need to be re-abandoned or vented in accordance with applicable regulations. The presence and location of all existing utilities on the property should be identified. Precautions should be taken to remove, relocate or protect existing utilities, as appropriate.

MM C-3. Prior to the start of grading, all vegetation and topsoil should be stripped. The vegetation should be removed from the site. The topsoil may be stockpiled and reused in planned landscape areas. In addition, any trees and shrubs should be cleared, so that no roots larger

- than 1-inch in diameter remain. Any soils loosened during removal of tree/shrubs should also be removed.
- MM C-4. Uncertified fill and soft native clayey soils cannot be used for foundation support, and therefore, need to be removed and replaced with structural fill, consistent with the findings of site-specific geotechnical evaluation.
- MM C-5. Prior to construction, field infiltration testing shall be conducted at locations where infiltration structures are planned.
- MM C-6. All grading should conform to the requirements of the City of Inglewood. The grading contractor is responsible for notifying the project Geotechnical Engineer of a pre-grading meeting prior to the start of grading operations and anytime that the operations are resumed after an interruption.
- MM C-7. Prior to site grading, the developer shall submit to the City of Inglewood Planning and Building Department a site-specific evaluation of soil conditions that is prepared by a registered soil professional that includes recommendations for ground preparation and earthwork activities specific to the site, soil removal and replacement, and other site-specific earthwork activities and in conformance with the City's Building Code. ~~uncertified fill and soft native soils should be removed and replaced with structural fill. It should be anticipated that unsuitable oversized debris may be present in the existing fill on site. The actual limits for removals should be determined by the project Geotechnical Engineer depending on the actual conditions encountered, consistent with the findings of a site specific geotechnical evaluation.~~
- MM C-8. During earthwork activities, the bottoms of completed excavations shall be observed by the project Geotechnical Engineer, while it is proof-rolled with loaded equipment. Any loose or yielding soils shall be over-excavated and recompacted to the limits determined by the project Geotechnical Engineer.
- MM C-9. Structural fill should consist of predominantly sandy soils, and should be free of expansive clay, rock greater than 3 inches in maximum size, debris and other deleterious materials. All structural fill should be compacted to at least 95 percent of the maximum dry density determined by ASTM D 1557-91. Fill placed in nonstructural and landscape areas should be compacted to at least 90 percent.
- MM C-10. All earthwork and grading shall be performed under the observation of the project Geotechnical Engineer. Compaction testing of the fill soils shall be performed at the discretion of the project Geotechnical Engineer. Testing shall be performed for approximately every 2 feet in fill thickness or 500 cubic yards of fill placed, whichever occurs first. If

- specified compaction is not achieved, additional compactive effort, moisture conditioning, and/or removal and recompaction of the fill soils will be required.
- MM C-11. All materials used for asphalt, concrete and base shall conform to the 2000 “Green Book” or the equivalent, and shall be compacted to at least 95 percent relative compaction.
- MM C-12. If, in the opinion of the Geotechnical Engineer, Contractor, or Owner, an unsafe condition is created or encountered during grading, all work in the area shall be stopped until measures can be taken to mitigate the unsafe condition. An unsafe condition shall be considered any condition that creates a danger to workers, on-site structures, on-site construction, or any off-site properties or persons.
- MM C-13. Groundwater encountered during temporary excavations shall be controlled using shallow trenches, sumps and pumps. In general, temporary excavations up to 3 feet deep may stand in vertical cuts; sandier layers should be sloped. Construction slopes in the parking Area and Barn Area should be made with an inclination of 1(H) to 1(V). Construction slopes in the Track Area should be made with an inclination of 1.5(H) to 1(V). If the above-recommended slopes are not feasible due to site restrictions, or if surcharge loads other than a nominal value of 240 psf due to traffic loads exist adjacent to the excavation, a flatter slope or temporary shoring may be needed. Earth pressure can be provided if temporary shoring is to be used.
- MM C-14. Surcharge loads, such as vehicular traffic, heavy construction equipment, and stockpiled materials should be kept away from the top of temporary excavations of a horizontal distance at least equal to the depth of excavation. Surface drainage should be controlled and prevented from running down the slope face. Poned water should not be allowed within the excavation. Workmen should be adequately protected within temporary excavations. Construction equipment and foot traffic should be kept off excavation slopes to minimize sloughing.
- MM C-15. All excavation slopes and shoring systems should meet the minimum requirements of the Occupational Safety and Health Association (OSHA) Standards. Maintaining safe and stable slopes on excavations is the responsibility of the contractor and will depend on the nature of the soils and groundwater conditions encountered and his method of excavation. Excavations during construction should be carried out in such a manner that failure or ground movement will not occur. The contractor should perform any additional studies deemed necessary to supplement the information contained in this report for the purpose of planning and executing his excavation plan.
- MM C-16. It should be anticipated that a site-specific design-level geotechnical report for each new project within the tract will be required. Specifically, after detailed building plans have been developed for each area of the Project Site, additional geotechnical explorations, testing, and analyses shall be performed, as warranted, in order to develop building-specific foundation

- recommendations. The Project shall be designed and constructed in accordance with the recommendations provided in these additional site specific geotechnical reports.
- MM C-17. The expansion potential of subgrade soils within foundation depth under building pads should be tested in building specific site investigations, and recommendations regarding expansive soils should be presented in site-specific geotechnical reports.
- MM C-18. Soil corrosivity should be tested in building specific site investigations. This potential should be considered in the design and protection of underground metal utilities.
- MM C-19. Assuming R-values of 15 after grading, the following pavement sections for Traffic Index (TI) values of 5, 6, and 7 are recommended:

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

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

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

LEVEL OF SIGNIFICANCE AFTER MITIGATION

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

With respect to threshold question (a)(i), the Proposed Project and the proposed Land Use Equivalency Program has the potential to expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of the Potrero Fault. Implementation of the Project

Design Feature above (see PDF C-1), would restrict development in the delineated RUZ area to non-habitable structures and thus would mitigate this hazard to a less than significant level.

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

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

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

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

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

IV. ENVIRONMENTAL IMPACT ANALYSIS

L. TRAFFIC/TRANSPORTATION

The following analysis summarizes the findings and conclusions of the Revised Traffic Impact Study for the Hollywood Park Redevelopment Project (the “Traffic Study,” “Traffic Impact Study,” or “TIS”), prepared by Linscott, Law & Greenspan Engineers, August 1, 2008. The Revised Traffic Impact Study is included in its entirety as Appendix G-1 to ~~this~~the Draft EIR. Additionally, a technical update to the Traffic Impact Study was prepared by LLG Engineers in response to comments that were received on the Draft EIR. The purpose of the updated traffic impact analysis is to:

- 1) Evaluate potential project and cumulative projects impacts based on comments provided by the City of Inglewood’s consulting traffic engineer as related to the existing Hollywood Park racetrack attendance credits;
- 2) Include updates to two key related projects in the immediate vicinity of Hollywood Park pursuant to their respective project status; and
- 3) Incorporate three additional supplemental traffic evaluations prepared in response to specific comments made by the City of Inglewood on the Draft EIR traffic impact study.

For comparative purposes the Traffic Section from the Draft EIR is being reprinted herein in redline strikethrough text to identify the changes to the findings and conclusions of the Traffic Impact Study. The Updated Traffic Impact Analysis is included in its entirety in Appendix K to the Final EIR.

The traffic analysis follows City of Inglewood traffic study guidelines and is consistent with traffic impact assessment guidelines set forth in the 2004 Congestion Management Program for Los Angeles County. The traffic analysis evaluates the project-related impacts associated with the proposed development at 66 key intersections in the vicinity of the Project Site. The study intersections were determined in consultation with the City of Inglewood Department of Public Works staff. The Intersection Capacity Utilization method was used to determine Volume-to-Capacity ratios and corresponding Levels of Service at the study intersections. Additionally, a review was conducted of the Los Angeles County Metropolitan Transportation Authority intersection and freeway monitoring stations to determine if a Congestion Management Program transportation impact assessment analysis is required for the proposed project.

The Traffic Impact Study (i) presents existing traffic volumes, (ii) forecasts future traffic volumes with and without the proposed project, (iii) determines project-related impacts, (iv) forecasts future cumulative traffic volumes, and (v) presents recommendations for mitigation where necessary.

Existing Project Site

The Proposed Project is located within the Manchester-Prairie and Century Redevelopment Constituent Project Areas of the Merged Redevelopment Project Area of the City of Inglewood. The Project Site is

generally bounded by vacant commercial property and existing residential development on the north, Century Boulevard on the south, existing residential development and a commercial shopping center on the east, and Prairie Avenue on the west (see Figure II-1, Regional and Vicinity Map in Section II, Project Description).

Existing Site Access

Primary vehicular access to the existing Hollywood Park Racetrack and Casino is presently provided via the following gates/driveways:

- Gate 2 on Prairie Avenue (opposite Arbor Vitae Street)
- Gate 3 on Prairie Avenue (opposite Hardy Street)
- Gate 4 on Century Boulevard (opposite Doty Avenue)
- Gate 5 on Century Boulevard (opposite Yukon Avenue)
- Gate 7/7A on Pincay Drive (opposite Carlton Square)

It should be noted that all five gates/driveways are presently controlled by traffic signals. Gates 2, 3, and 4 provide access for the general public to both the racetrack and the casino while Gate 7/7A is limited to employee and delivery vehicles only. Gate 5 is typically not utilized and is currently gated. All of the existing project gates/driveways currently accommodate full access (i.e., left-turn and right-turn ingress and egress turning movements). Other driveways are also provided along Prairie Avenue, Century Boulevard, and Pincay Drive but these driveways are only utilized on an as-needed basis.

Existing Street System

Regional Highway System

Regional access to the Project Site is provided by the San Diego Freeway (I-405) and the Century Freeway (I-105). A brief description of I-405 and I-105 Freeways are provided in the following paragraphs.

I-405 (San Diego) Freeway is a major north-south oriented freeway that extends from the San Fernando area to the north and the San Diego area to the south. In the project vicinity, the I-405 Freeway contains five mainline freeway lanes (four mixed flow lanes and one carpool lane) in each direction. Northbound and southbound ramps are provided on I-405 Freeway at Manchester Boulevard and at Century Boulevard, which are located approximately one and one-half miles west of the Project Site.

I-105 (Century) Freeway is a major east-west oriented freeway that extends from the Norwalk area to the east and the El Segundo / Los Angeles International Airport areas to the west. In the project vicinity, the I-105 Freeway contains five mainline freeway lanes (four mixed flow lanes and one carpool lane) in each

direction. Eastbound and westbound ramps are provided on I-105 Freeway at Prairie Avenue and at Crenshaw Boulevard, which are located approximately one and one-half miles south of the Project Site.

Local Street System

Immediate access to the Project Site is provided via Prairie Avenue, Century Boulevard, and Pincay Drive. In consultation with the City of Inglewood Department of Public Works staff, the following 66 intersections were selected for analysis to evaluate the potential impacts generated by the proposed project (the City in which each study intersection is located is identified in parentheses):

1. Sepulveda Boulevard/Slauson Avenue (City of Culver City)
2. Sepulveda Boulevard/Centinela Avenue (City of Los Angeles)
3. La Cienega Boulevard Southbound (SB)/Slauson Avenue (County of Los Angeles)
4. La Cienega Boulevard Northbound (NB)/Slauson Avenue (County of Los Angeles)
5. La Tijera Boulevard/Centinela Avenue (City of Los Angeles)
6. La Cienega Boulevard/La Tijera Boulevard (City of Los Angeles)
7. La Cienega Boulevard/Centinela Avenue (City of Los Angeles)
8. La Cienega Boulevard/Manchester Boulevard (City of Inglewood)
9. I-405 Freeway NB Ramps/Manchester Boulevard (City of Inglewood)
10. La Cienega Boulevard/Arbor Vitae Street (City of Inglewood)
11. La Cienega Boulevard/I-405 Freeway SB Ramps, north of Century Boulevard (City of Los Angeles)
12. La Cienega Boulevard/Century Boulevard (City of Los Angeles)
13. La Cienega Boulevard/I-405 Freeway SB Ramps, south of Century Boulevard (City of Los Angeles)
14. I-405 Freeway NB Ramps/Century Boulevard (City of Inglewood)
15. Inglewood Avenue/Arbor Vitae Street (City of Inglewood)
16. Inglewood Avenue/Century Boulevard (City of Inglewood)
17. La Brea Avenue/Slauson Avenue (County of Los Angeles)

18. La Brea Avenue/Centinela Avenue (City of Inglewood)
19. La Brea Avenue/Florence Avenue (City of Inglewood)
20. La Brea Avenue/Manchester Boulevard (City of Inglewood)
21. La Brea Avenue/Arbor Vitae Street (City of Inglewood)
22. La Brea Avenue/Century Boulevard (City of Inglewood)
23. Hawthorne Boulevard/Imperial Highway (City of Hawthorne)
24. Centinela Avenue/Florence Avenue (City of Inglewood)
25. Prairie Avenue/Florence Avenue (City of Inglewood)
26. Prairie Avenue/Manchester Boulevard (City of Inglewood)
27. Prairie Avenue/Kelso Street-Pincay Drive (City of Inglewood)
28. Prairie Avenue/Arbor Vitae Street-Gate 2 (City of Inglewood)
29. Prairie Avenue/Hardy Street-Gate 3 (City of Inglewood)
30. Prairie Avenue/Century Boulevard (City of Inglewood)
31. Prairie Avenue/I-105 Freeway Eastbound (EB)-Westbound (WB) Off Ramps-112th Street (City of Inglewood)
32. I-105 Freeway EB On-Ramp-Freeman Avenue/Imperial Highway (City of Hawthorne)
33. Prairie Avenue/Imperial Highway (City of Hawthorne)
34. Cemetery Driveway-Kareem Court/Manchester Boulevard (City of Inglewood)
35. Crenshaw Drive-Briarwood Lane/Manchester Boulevard (City of Inglewood)
36. Kareem Court-Gate 8/Pincay Drive (City of Inglewood)
37. Carlton Drive-Gate 7-7A/Pincay Drive (City of Inglewood)
38. Gate 4-Doty Avenue/Century Boulevard (City of Inglewood)
39. Gate 5-Yukon Avenue/Century Boulevard (City of Inglewood)
40. Club Drive/Century Boulevard (City of Inglewood)
41. Crenshaw Boulevard/Slauson Avenue (City of Los Angeles)

42. Crenshaw Boulevard/Florence Avenue (City of Los Angeles)
43. Crenshaw Boulevard/Crenshaw Drive-82nd Street (City of Inglewood)
44. Crenshaw Boulevard/8th Avenue (City of Inglewood)
45. Crenshaw Boulevard/Manchester Boulevard (City of Inglewood)
46. Crenshaw Boulevard/Pincay Drive-90th Street (City of Inglewood)
47. Crenshaw Boulevard/Century Boulevard (City of Inglewood)
48. Crenshaw Boulevard/Imperial Highway (City of Inglewood)
49. Crenshaw Boulevard/Shopping Center Driveway, south of Imperial Highway (City of Inglewood)
50. Crenshaw Boulevard/116th Street (City of Inglewood)
51. Crenshaw Boulevard/118th Place-I-105 Freeway WB Ramps (City of Inglewood)
52. I-105 Freeway EB Ramps/120th Street (City of Hawthorne)
53. Crenshaw Boulevard/120th Street (City of Hawthorne)
54. Western Avenue/Manchester Avenue (City of Los Angeles)
55. Western Avenue/Century Boulevard (City of Los Angeles)
56. Vermont Avenue/Manchester Avenue (City of Los Angeles)
57. Vermont Avenue/Century Boulevard (City of Los Angeles)
58. Figueroa Street/Manchester Avenue (City of Los Angeles)
59. I-110 Freeway SB Ramps/Manchester Avenue (City of Los Angeles)
60. I-110 Freeway NB Ramps/Manchester Avenue (City of Los Angeles)
61. Figueroa Street/Century Boulevard (City of Los Angeles)
62. I-110 Freeway SB Off-Ramp-Grand Avenue/Century Boulevard (City of Los Angeles)
63. I-110 Freeway NB On-Ramp-Olive Street/Century Boulevard (City of Los Angeles)
64. Crenshaw Boulevard/104th Street (City of Inglewood)
65. Proposed Signalized Driveway/Century Boulevard (City of Inglewood)

66. Prairie Avenue/97th Street (City of Inglewood)

The location of each intersection is depicted in Figure IV.L-1. All of the existing study intersections selected for analysis are currently controlled by traffic signals with the exception of the Crenshaw Boulevard & Shopping Center Driveway intersection (just south of Imperial Highway) and the Prairie Avenue & 97th Street intersection. The existing lane configurations at the 66 study intersections are displayed in Figure IV.L-2.

Roadway Classifications

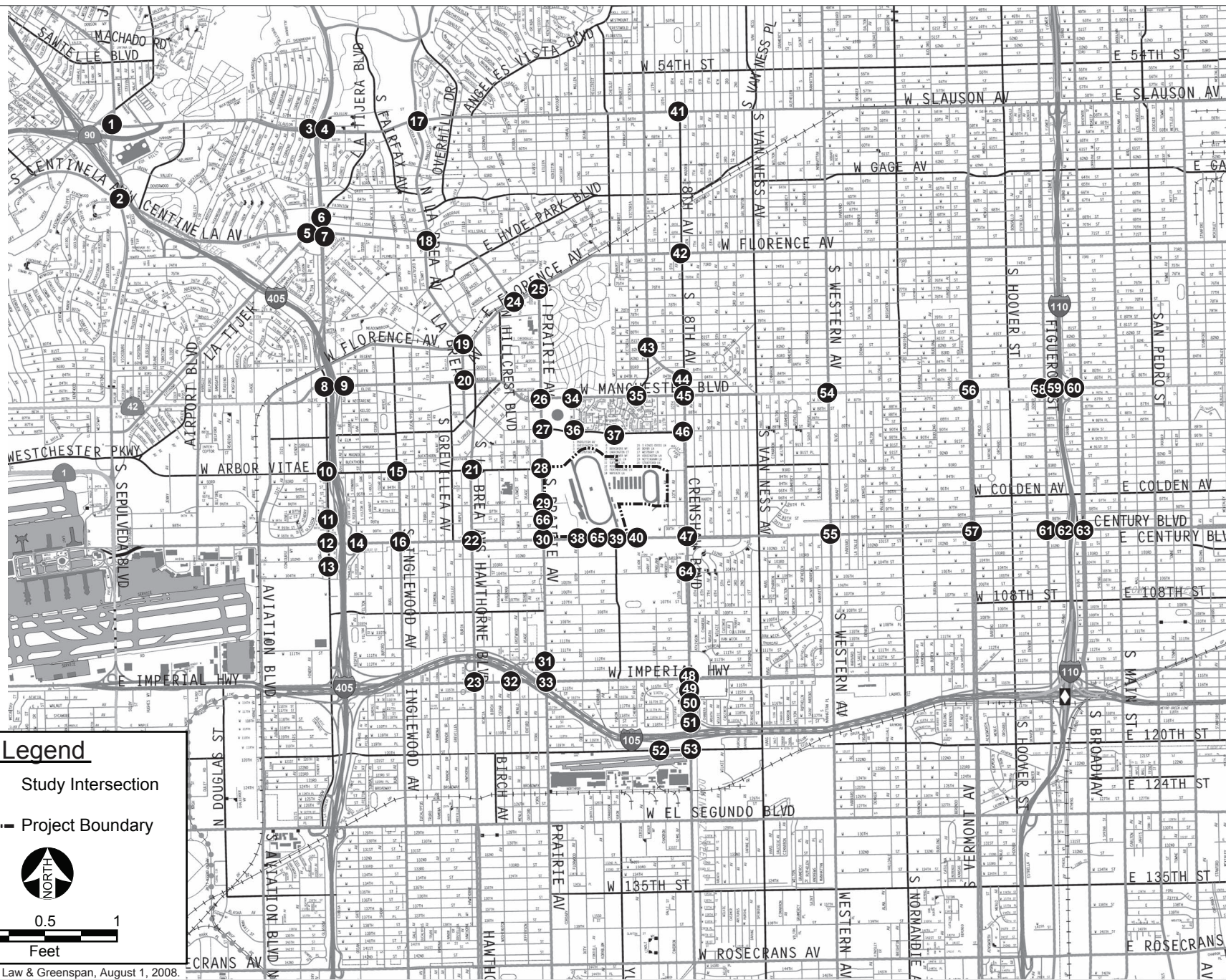
The City of Inglewood utilizes the roadway categories recognized by regional, state and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

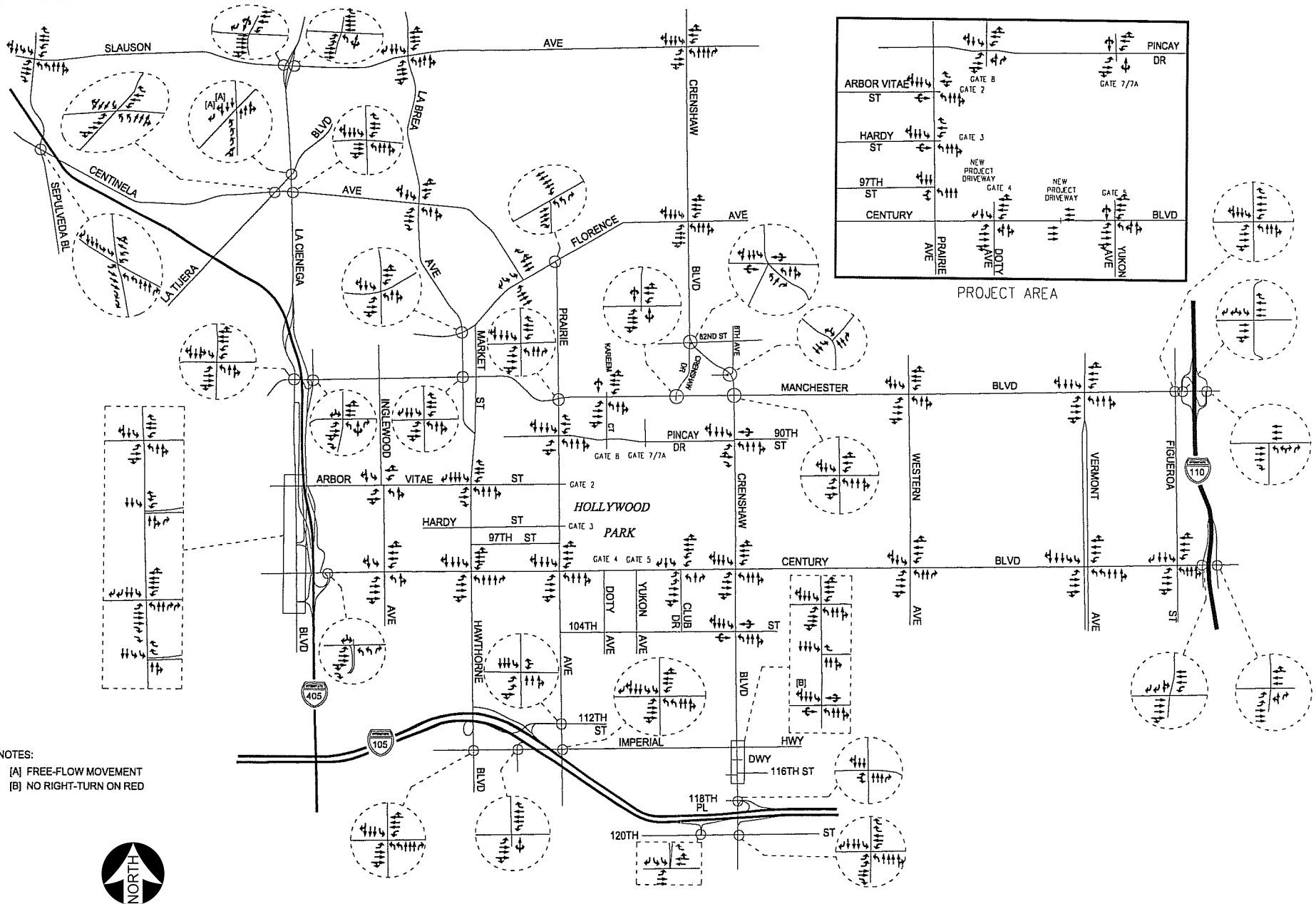
- Freeways are limited-access and high speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses.
- Arterial roadways are major streets that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. Principal arterials are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials are typically two-to-four lane streets that service local and commuter traffic.
- Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. They connect local streets to arterials and are typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking. They may also provide access to abutting properties.

Local roadways distribute traffic within a neighborhood or similar adjacent neighborhoods and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are fronted by residential uses and do not typically serve commercial uses.

Roadway Descriptions

A review of the important roadways in the Project Site vicinity and study area is provided in the Traffic Impact Study. As indicated in Traffic Impact Study, the important roadways within the project study area were reviewed on a segment basis in terms of the number of lanes provided, parking restrictions, posted





- NOTES:
- [A] FREE-FLOW MOVEMENT
 - [B] NO RIGHT-TURN ON RED

Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-2
Existing Lane Configurations

speed limits, etc. Additionally, the roadway classifications as designated by the appropriate jurisdiction are noted on a segment basis.

Public Transit Services

Public transit services in the project study area are currently provided by the Los Angeles County Metropolitan Transportation Authority (MTA). A summary of the existing transit routes, including the transit route, destinations and peak hour headways is presented in Table IV.L-1. The existing public transit routes in the proposed Project Site vicinity are illustrated in Figure IV.L-3. It should be noted that although public transit information is provided in this study, no reduction has been taken in the determination of the proposed project's vehicular trip generation forecasts and the corresponding traffic impacts to the surrounding street system to account for project-related trips that may be made via public transit in lieu of a private automobile.

Existing Bus Transit

The MTA provides bus transit service along major roadways within the project vicinity: Century Boulevard, Prairie Avenue, Manchester Boulevard, and Crenshaw Boulevard. The MTA operates ten transit routes along these four major roadways surrounding the Project Site. Most of the MTA bus transit routes provide headways of two to six buses per hour in each direction during the weekday morning and afternoon peak commuter hours and during the Saturday mid-day peak hour.

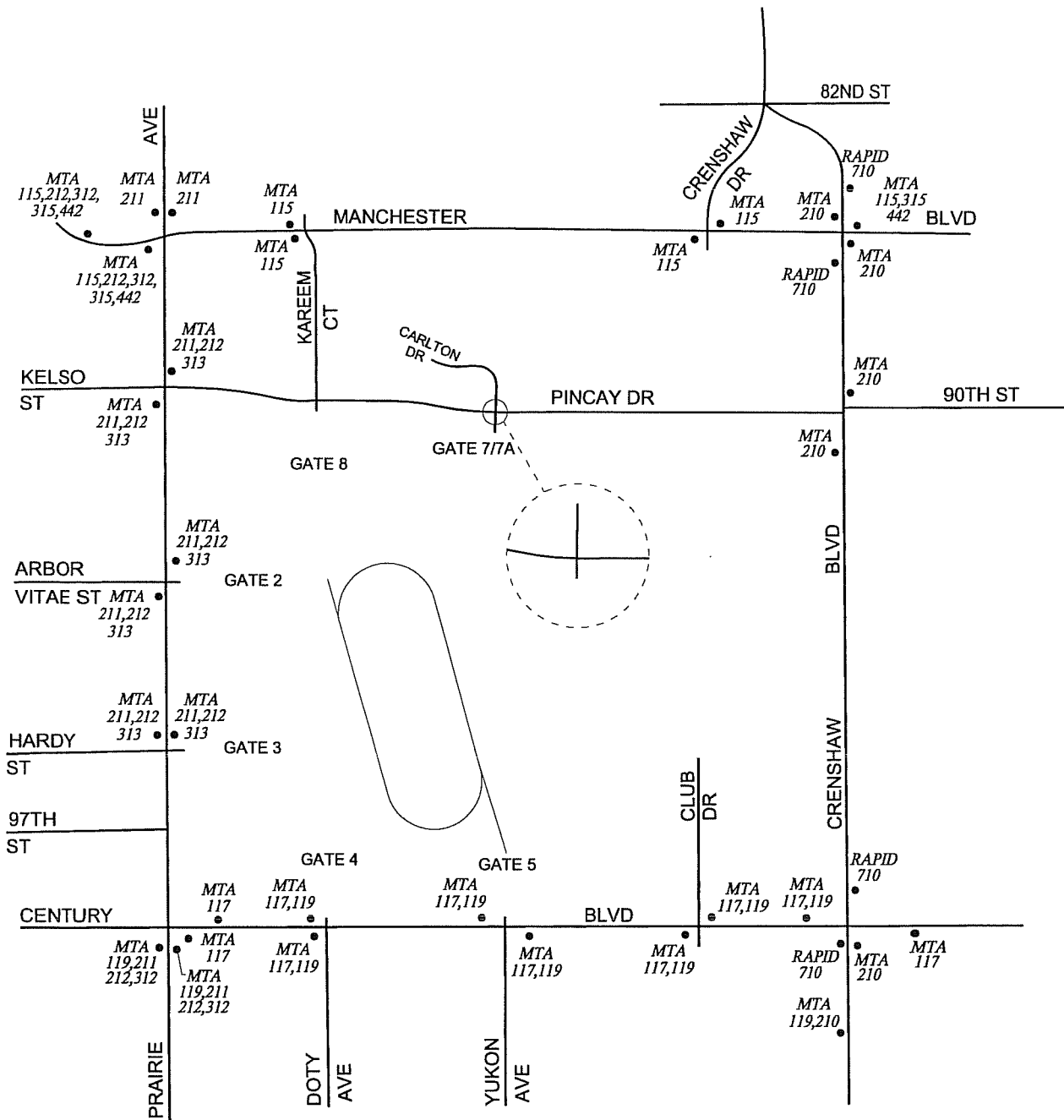
The existing average weekday transit bus ridership data for the available transit lines provided by the MTA is presented in detail in the Traffic Impact Study. For each transit line shown, the bus stop located nearest to the Project Site where ridership data is available in each direction was identified. In addition, the average load representing the average number of persons on each bus during the weekday AM and PM peak hours is summarized. The average bus load during the weekday AM peak hour ranges from two persons per bus (Route 119) to 25 persons per bus (Route 117). The average bus load during the weekday PM peak hour ranges from three persons per bus (Route 211) to 24 persons per bus (Route 117). Based on this review, capacity to accommodate potential transit ridership generated to and from the proposed project is available.

Existing Metro Green Line

The Metro Rail system is comprised of the Metro Blue, Green, Red, Purple, and Gold Lines. The project study area is currently served by the Metro Green Line, which crosses the Metro Blue Line and runs in an east-west direction between Norwalk and Redondo Beach, curving south near the Los Angeles International Airport. The two closest Metro Green Line Stations to the Project Site include the Hawthorne Station which is located approximately one mile to the southwest and the Crenshaw Station which is located approximately one and a half mile to the southeast. The Metro Green Line currently provides headway of eight trains per hour in each direction during the weekday morning and afternoon peak commuter hours and four trains per hour in each direction during the Saturday mid-day peak hour.

**Table IV.L-1
Existing Transit Routes**

Route	Destinations	Roadway Near Site	No. of Buses/Trains during Peak Hour			
			DIR	AM	PM	SAT
Metro Route 115	Pacific Avenue/Culver Boulevard to Norwalk Station	Prairie Avenue; Manchester Boulevard; Kareem Court; Crenshaw Drive; Crenshaw Boulevard	EB	8	5	4
			WB	11	6	4
Metro Route 117	City Bus Center to Lakewood Station	Century Boulevard; Prairie Avenue; Doty Avenue; Yukon Avenue; Club Drive; Crenshaw Boulevard	EB	3	4	5
			WB	4	3	4
Metro Route 119	Hawthorne/I-105 Station to 103rd Street/Kenneth Hahn Station	Century Boulevard; Prairie Avenue; Doty Avenue; Yukon Avenue; Club Drive; Crenshaw Boulevard	EB	1	1	N/A
			WB	1	1	N/A
Metro Route 210	South Bay Galleria to Hollywood/Vine Station	Crenshaw Boulevard; Manchester Boulevard; 90th Street; Pincay Drive; Century Boulevard	NB	6	4	4
			SB	5	5	3
Metro Route 211	South Bay Galleria to Market Street/ Manchester Boulevard	Manchester Boulevard; Prairie Avenue; Kelso Street; Arbor Vitae Street; Hardy Street; Century Boulevard	NB	2	2	N/A
			SB	4	2	N/A
Metro Route 212	Hawthorne/I-105 Station to Hollywood/Vine Station	Manchester Boulevard; Prairie Avenue; Kelso Street; Arbor Vitae Street; Hardy Street; Century Boulevard	NB	2	5	4
			SB	3	N/A	4
Metro Route 312	Hawthorne/I-105 Station to Hollywood/Vine Station	Manchester Boulevard; Prairie Avenue; Century Boulevard	NB	6	N/A	N/A
			SB	N/A	5	N/A
Metro Route 315	Pacific Avenue/Culver Boulevard to Norwalk Station	Prairie Avenue; Manchester Boulevard; Crenshaw Boulevard	EB	3	5	N/A
			WB	5	4	N/A
Metro Route 442	Hawthorne/I-105 Station to Patsaouras Transit Plaza	Manchester Boulevard; Crenshaw Boulevard; Century Boulevard	NB	2	N/A	N/A
			SB	N/A	2	N/A
Rapid Route 710	South Bay Galleria to Hollywood/Vine Station	Manchester Boulevard; Crenshaw Boulevard; Century Boulevard	NB	6	6	4
			SB	6	6	4
Metro Green Line	Redondo Beach to Norwalk	Crenshaw Boulevard; Hawthorne Boulevard	EB	8	8	4
			WB	8	8	4

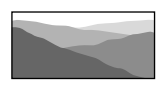


Metro Green Line
Hawthorne Station

Metro Green Line
Crenshaw Station



Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-3
Existing Transit Lines

Potential Future Rail Services

Based on information provided by the City of Inglewood, the MTA had acquired the right-of-way along the BNSF railroad tracks adjacent to Florence Avenue, which may potentially be developed in the future into some form of rail services. However, the timing and scope of such rail services can not be determined at this time and therefore are not included in this traffic analysis.

Traffic Counts

Manual traffic counts of vehicular turning movements were conducted at each of the 66 study intersections during the weekday morning (AM) and afternoon (PM) commuter periods as well as the Saturday mid-day period to determine the peak hour traffic volumes. The manual traffic counts were conducted by two traffic count subconsultants (i.e., City Traffic Counters and The Traffic Solution) at the study intersections from 7:00 to 9:00 AM to determine the weekday AM peak commuter hour, from 4:00 to 6:00 PM to determine the weekday PM peak commuter hour, and from 11:00 AM to 2:00 PM on Saturday to determine the Saturday mid-day peak hour. The traffic counts were conducted during weekdays when local schools were in session. Traffic volumes at the study intersections show the typical peak periods between 7:00 to 9:00 AM and 4:00 to 6:00 PM generally associated with weekday peak commuter hours in the metropolitan Los Angeles area.

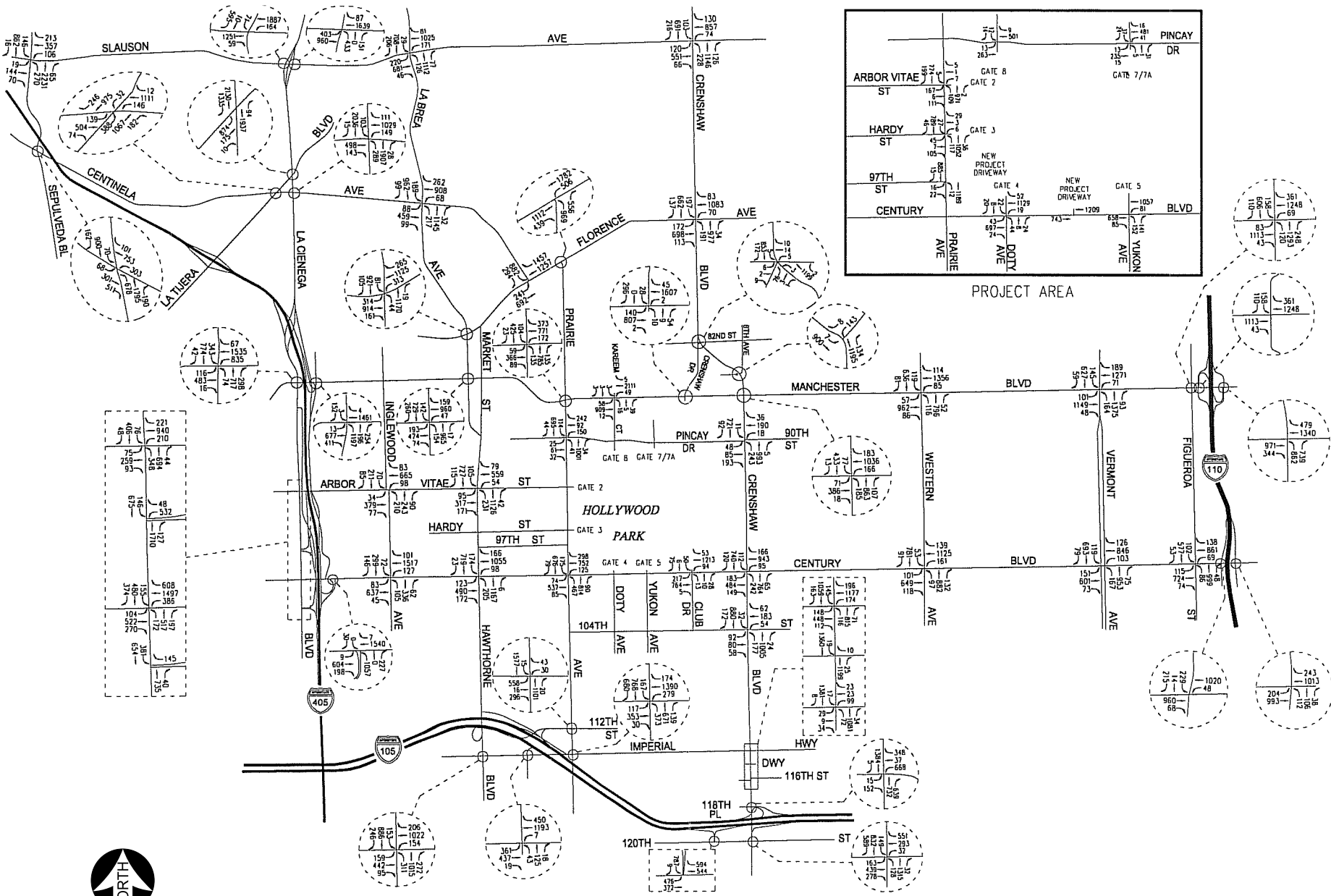
The weekday AM, weekday PM, and Saturday mid-day peak period manual counts of vehicle movements at the 66 study intersections are summarized in detail in the Traffic Impact Study. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are shown in Figures IV.L-4 and IV.L-5, respectively. The existing traffic volumes at the study intersections during the Saturday mid-day peak hour are shown in Figure IV.L-6. Summary data worksheets of the manual turning movement traffic counts are contained in the Traffic Impact Study.

Project Trip Generation

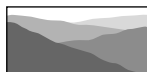
Traffic volumes expected to be generated by the proposed project during the weekday AM and PM peak hours and Saturday mid-day peak hour, as well as on a daily basis for a weekday and a Saturday, were estimated using rates published in the Institute of Transportation Engineers' (ITE) Trip Generation manual, 7th Edition, 2003. Trip generation forecasts for the individual project land use components and existing uses to be removed are summarized in the following paragraphs. As previously noted, although public transit information is provided in this study, no reduction has been taken in the determination of the proposed project's vehicular trip generation forecasts and the corresponding traffic impacts to the surrounding street system.

Shopping Center Component

Traffic volumes expected to be generated by the shopping center (i.e., retail) component were forecast based upon rates per thousand square feet of development. ITE Land Use Code 820 (Shopping Center)

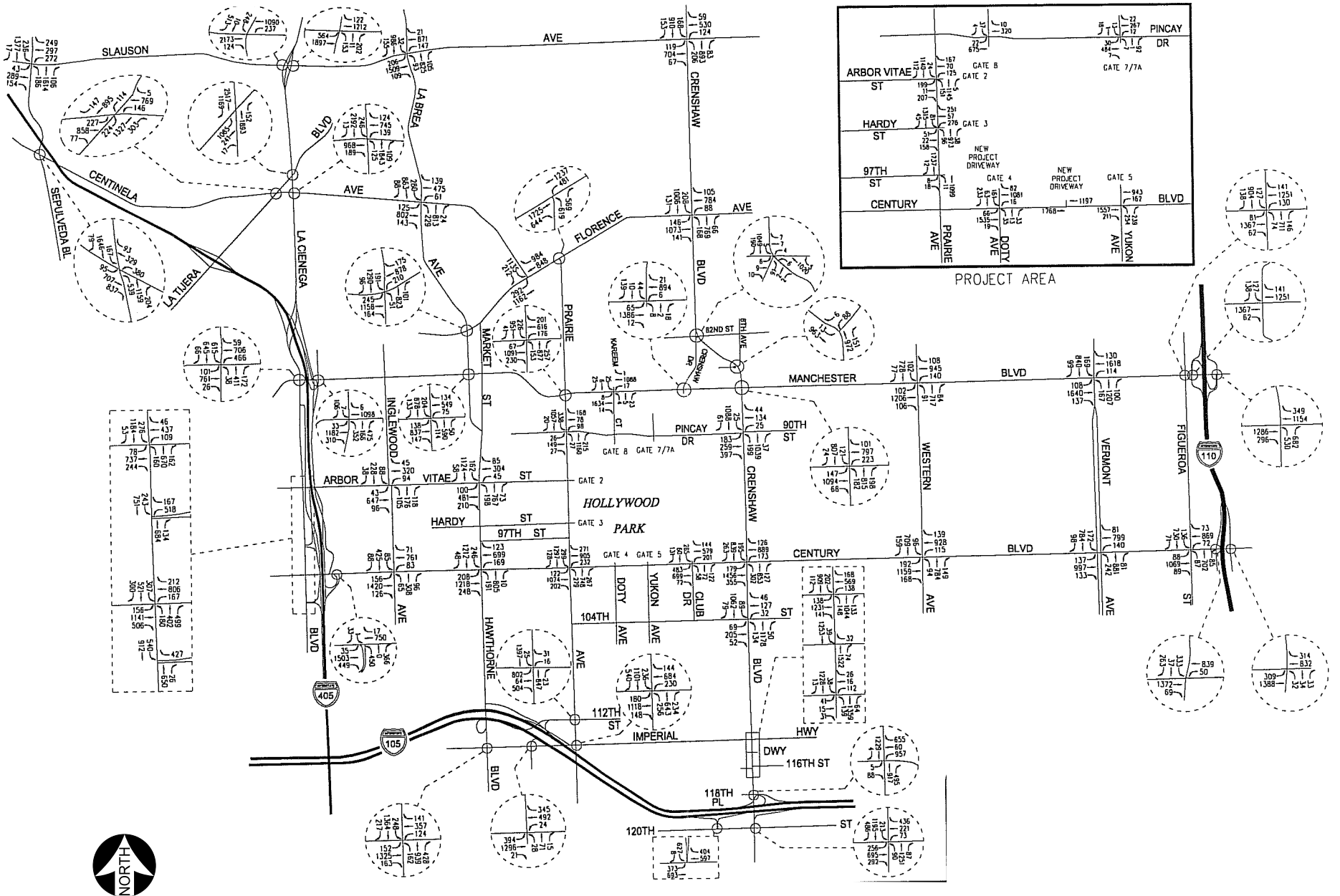


Source: Linscott, Law & Greenspan, August 1, 2008.

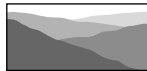


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Figure IV.L-4
Existing Traffic Volumes
Weekday AM Peak Hour

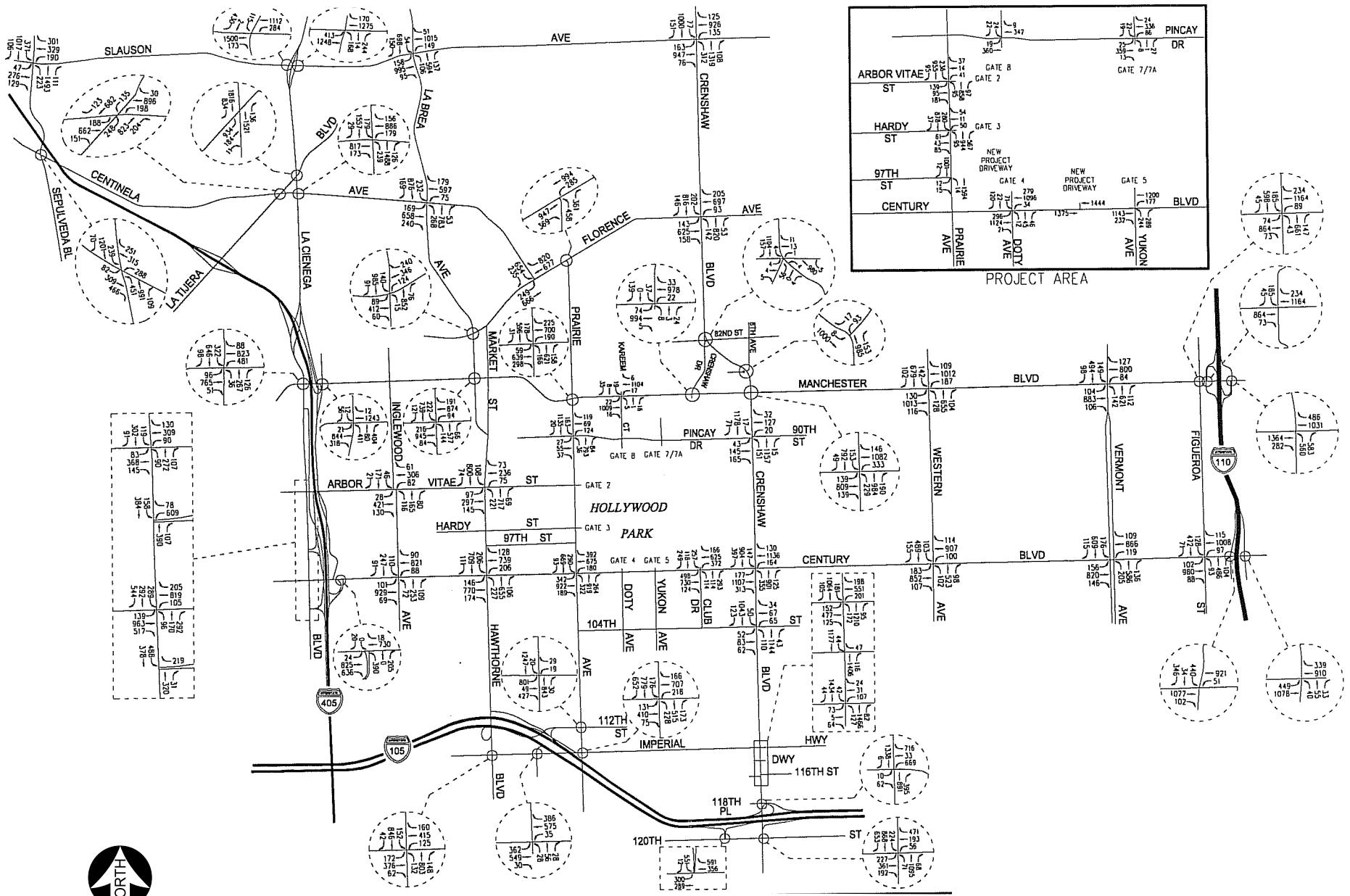


Source: Linscott, Law & Greenspan, August 1, 2008.

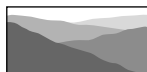


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Figure IV.L-5
Existing Traffic Volumes
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, August 1, 2008.



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Figure IV.L-6
Existing Traffic Volumes
Saturday Mid-Day Peak Hour

trip generation equation rates were used to forecast the traffic volumes expected to be generated by the retail use.

Casino/Off-Track Betting Component

Traffic volumes expected to be generated by the casino/off-track betting component were based on traffic count data collected at the existing Hollywood Park Casino. Weekday and weekend traffic counts were conducted at the project driveways on days without live horse racing events at the Hollywood Park in order to isolate the trip generation associated with the existing casino and simulcast operation. Summary data worksheets of the manual turning movement traffic counts at the project driveways (i.e., without live horse racing events) are contained in detail in the Traffic Impact Study (see Appendix G-1). As off-track betting is currently available at Hollywood Park and will continue to be available in the future, the traffic count data collected at the project driveways provide a valid estimate of trip generation associated with the casino/off-track betting component.

Residential Component

Traffic volumes expected to be generated by the residential component were forecast based upon rates per number of dwelling units. ITE Land Use Code 230 (Residential Condominium/Townhouse) trip generation equation rates were used to derive average rates to forecast the traffic volumes expected to be generated by the residential component. The regression equations contained in the ITE manual represent a best fit of actual traffic counts conducted at existing residential sites. However, most of the trip generation surveys contained in the ITE manual for this land use during the weekday conditions were conducted for existing developments with 600 dwelling units or less. Given the size of the proposed residential component (2,995 units proposed), it is therefore more appropriate and conservative to derive average daily, AM and PM peak hour trip generation rates based on 600 dwelling units to forecast traffic generation as opposed to using the corresponding fitted curve equations directly from the ITE manual. Had the fitted curve equations been directly applied to the 2,995 units without adjustment, it would result in lower trip generation forecasts for the residential component. Specifically, the residential component's weekday traffic generation forecast would be about 27% lower during the weekday AM peak hour, 26% lower during the weekday PM peak hour, and 22% lower on a daily basis when compared to the methodology used in the Traffic Impact Study.

Similarly, most of the trip generation surveys contained in the ITE manual for this land use during the Saturday conditions were conducted for existing developments with 400 dwelling units or less. Given the size of the proposed residential component, it is therefore more appropriate and conservative to derive average Saturday daily and mid-day peak hour trip generation rates based on 400 dwelling units to forecast traffic generation as opposed to using the corresponding fitted curve equations directly from the ITE manual. Had the fitted curve equations been directly applied to the 2,995 units without adjustment, it would result in lower trip generation forecasts for the residential component. Specifically, the residential component's Saturday traffic generation forecast would be about 24% lower during the mid-day peak hour and 20% lower on a daily basis when compared to the methodology used in this traffic impact study.

It is recognized that the residential component of the proposed project consists of a wide spectrum of residential product types including some single-family detached homes, attached condominiums/townhouses, and podium units. Thus, use of the ITE Land Use Code 230 (Residential Condominium/ Townhouse) was intended to represent a range of residential product type that could be developed on the Project Site.

It should be noted that the community space component of the project is anticipated to primarily serve the residential component of the project only and, therefore, its potential to generate new trips onto the local street system is negligible.

Civic Use Component

A four acre site is proposed for civic uses which may include a school, a library, a community center, etc. For purposes of the trip generation forecast, it is conservatively assumed that the civic use component could be developed as an elementary school during the weekday AM peak hour analysis time period, since elementary schools typically have higher trip generation potential than libraries or community centers during the AM peak hour. For the weekday PM peak hour and the weekend mid-day peak hour analysis time periods, it is conservatively assumed that the civic use component could be developed as a library, since libraries typically have higher trip generation potential than schools or community centers during the weekday PM peak hour and the weekend mid-day peak hour.

Traffic volumes expected to be generated by the civic use component during the weekday AM peak hour were based upon rates per number of elementary school students. ITE Land Use Code 520 (Elementary School) trip generation average rates were used to forecast the traffic volumes expected to be generated by the civic use during the weekday AM peak hour. Traffic volumes expected to be generated by the civic use component during the weekday PM peak hour and the weekend mid-day peak hour were based upon rates per thousand square feet of development. ITE Land Use Code 590 (Library) trip generation average rates were used to forecast the traffic volumes expected to be generated by the civic use during the weekday PM peak hour and the weekend mid-day peak hour.

It is anticipated that the elementary school will primarily serve the residential component of the proposed project with a portion of the student population will be coming from other areas of Inglewood. Based on information provided in the Final Developer Fee Justification Study & School Facilities Needs Analysis 2006-2007, Sage Institute Inc., student generation rates of 0.35 student per household for grades K-5 and 0.15 student per household for grades 6-8 are determined. For purposes of the Traffic Impact Study, it is conservatively assumed that approximately one student for every seven residential units (i.e., 0.15 student per household) will be generated by the residential component of the project. Traffic associated with the remaining student population is assumed to be generated to and from other areas of Inglewood.

It is assumed that the library would be 30,000 square feet and would serve the residential component of the proposed project in addition to the existing Inglewood community.

Hotel Component

Traffic volumes expected to be generated by the hotel were based upon rates per occupied rooms. ITE Land Use Code 310 (Hotel) trip generation average rates were used to forecast the traffic volumes expected to be generated by the hotel component. It should be noted that the ITE trip generation rates for hotels have already accounted for hotel supporting facilities such as restaurants, cocktail lounges, meeting rooms, etc. However, a separate trip generation forecast has been developed for the proposed meeting space (20,000 square feet) located within the hotel to provide a conservative analysis as the proposed meeting space may be larger than what is otherwise provided at a typical 300 room hotel. Traffic volumes expected to be generated by the meeting space of the hotel component were based upon rates per thousand square feet of development. As the Trip Generation manual does not provide a hotel meeting room land use category, ITE Land Use Code 495 (Recreational Community Center) trip generation average rates were used to forecast the traffic volumes expected to be generated by the meeting space of the hotel component as this land use provides the “best fit” to the proposed meeting room component.

General Office Component

Traffic volumes expected to be generated by the office component were based upon rates per thousand square feet of development. ITE Land Use Code 710 (General Office) trip generation equation rates were used to forecast the traffic volumes expected to be generated by the office component.

Internal Capture and Pass-By Reductions

In addition to the trip generation forecast for the proposed project (which is essentially an estimate of the number of vehicles that could be expected to enter and exit the site access points), a forecast was made of likely internal capture and pass-by trips, as discussed in the following paragraphs.

Internal capture adjustments refer to a reduction of external trips for mixed-use developments such as the proposed project. Because of the nature of multi-use, or mixed-use, project development land use components (e.g., interaction between the office, retail and residential uses), trip making characteristics are interrelated and some trips are made among the various land uses on-site. These internal trips are not generated on the external street system and can be made either by walking or by vehicles entirely on internal roadways without using streets external to the site. Thus, internal capture trip reduction adjustments were applied to each of the project land use components to account for the trip interactions between the various project land uses. The internal capture rates for the proposed project were estimated based on the methodology outlined in Chapter 7 – Multi-Use Development of the Trip Generation Handbook, An ITE Recommended Practice, published by ITE, June 2004.

Pass-by trips are made as intermediate stops on the way from an origin to a primary destination without a route diversion. Pass-by trips are attracted from traffic passing the site on an adjacent street or roadway that offers direct access to the site. In this instance, the adjacent roadways to the Project Site include Prairie Avenue and Century Boulevard. The pass-by traffic forecast is based on the methodology and equations contained in Chapter 5 – Pass-by, Primary and Diverted Linked Trips of the Trip Generation

Handbook, An ITE Recommended Practice, published by ITE, June 2004. Based on the ITE guidelines, a 23% pass-by reduction adjustment was applied to the proposed retail component of the project during the weekday analysis conditions and a 26% pass-by reduction adjustment was applied to the proposed retail component of the project during the Saturday analysis conditions. No pass-by reductions are applied to any of the other components of the project.

Existing Uses To Be Removed

The project trip generation forecasts also includes a trip generation credit for the existing Hollywood Park Racetrack which will be removed to accommodate the Proposed Project. The existing Casino currently on-site will remain at its current location. As stated in the Circulation Element of the Inglewood General Plan (adopted December 15, 1992), the Hollywood Park racetrack historically accommodated over 50,000 patrons during a race day. A review of the prior Hollywood Park racetrack attendance records during live-horse racing seasons was conducted to determine the appropriate attendance credit. The daily Hollywood Park Racetrack attendance records during live-horse racing seasons for the past seven years are sorted and summarized in the Traffic Impact Study separately for the weekday and weekend conditions. As shown, the highest weekday attendance during the past seven years at the Hollywood Park racetrack was 23,609 patrons. However, to maintain a conservative analysis of project trip generation, a weekday live-horse racing event with an attendance of 10,000 patrons has been assumed for purposes of developing the weekday existing use credit. This represents less than half of the peak recorded attendance in the past seven years and is well below the attendance level as documented in the General Plan.

During the period from 1989 through 2006, the daily attendance records during live racing indicate that the highest and lowest weekday attendance at Hollywood Park was 42,612 and 312, respectively, while the highest and lowest weekend attendance during the same period was 51,151 and 5,017, respectively. Similarly, as shown, the highest weekend attendance during the past seven years at the Hollywood Park racetrack was 29,151 patrons. ~~However, to maintain a conservative analysis~~ Based on a review of the Hollywood Park Racetrack historic attendance records, the 85th percentile attendance was used to determine a reasonable attendance credit for the racetrack. The 85th percentile represents approximately 8,700 weekday patrons and 12,200 weekend patrons. ~~of project trip generation, a weekend live-horse racing event with an attendance of 15,000 patrons has been assumed for purposes of developing the weekend existing use credit.~~ This represents approximately half of the peak recorded attendance in the past seven years and is well below the attendance level as documented in the General Plan.

To develop trip generation forecasts appropriately for a ~~108,000~~700-attendance weekday event and a ~~1512,000~~200-attendance weekend event at the Hollywood Park, additional driveway traffic counts at the Hollywood Park (with and without live horse racing) were conducted and reviewed. The Updated Traffic Impact Study summarizes the methodology and assumptions utilized in the development of trip generation associated with the ~~10,8,700~~000-attendance weekday and ~~15,000~~12,200-attendance weekend events.

The weekday and weekend project traffic generation forecasts for the proposed project are summarized in the following sub-sections. It should be noted that proposed project traffic generation forecasts include the casino/off-track betting component. Therefore, the existing trip generation credit appropriately also includes traffic generation from the casino use, since the casino is proposed to remain at its current location.

Weekday Project Trip Generation

The weekday traffic generation forecast for the proposed project is summarized in detail in the Updated Traffic Impact Study. As summarized, the proposed project is expected to generate an additional 1,604 vehicle trips (588 more inbound trips and 1,016 more outbound trips) during the weekday AM peak hour. During the weekday PM peak hour the proposed project is expected to generate an additional 419~~39 fewer~~ vehicle trips (~~1,298-340~~ more inbound trips and ~~1,337-921~~ fewer outbound trips). Over a 24-hour period, the proposed project is forecast to generate an additional ~~17,222~~19,512 daily trip ends during a typical weekday (approximately ~~8,614~~9,756 inbound trips and ~~8,614~~9,756 outbound trips).

Weekend Project Trip Generation

The weekend traffic generation forecast for the proposed project is summarized in detail in the Updated Traffic Impact Study. As summarized, the proposed project is expected to generate an additional ~~1,374~~1,744 vehicle trips (~~105-441~~ more inbound trips and ~~1,269~~1,303 more outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, the proposed project is forecast to generate an additional ~~25,508~~27,358 daily trip ends during a typical weekend day (approximately ~~12,754~~13,679 inbound trips and ~~12,754~~13,679 outbound trips).

Project Trip Distribution

Project generated traffic was assigned to the local roadway system based on traffic distribution patterns which accounted for the proposed project land uses, the proposed site access scheme, existing traffic movements, characteristics of the surrounding roadway system and nearby regional population and employment centers.

The forecast project traffic distribution percentages at the 66 study intersections are displayed in the Traffic Impact Study for the retail/office, the casino/off-track betting, the residential, the civic use, and the hotel components, respectively. The forecast project traffic distribution percentages of the existing site at the 66 study intersections are also displayed in detail in the study for the weekday AM peak hour, the weekday PM peak hour, and the Saturday mid-day peak hour.

The forecast project traffic volumes for the weekday AM peak hour, weekday PM peak hour, and Saturday mid-day peak hour are displayed in Figures IV.L-7, IV.L-8, and IV.L-9, respectively.

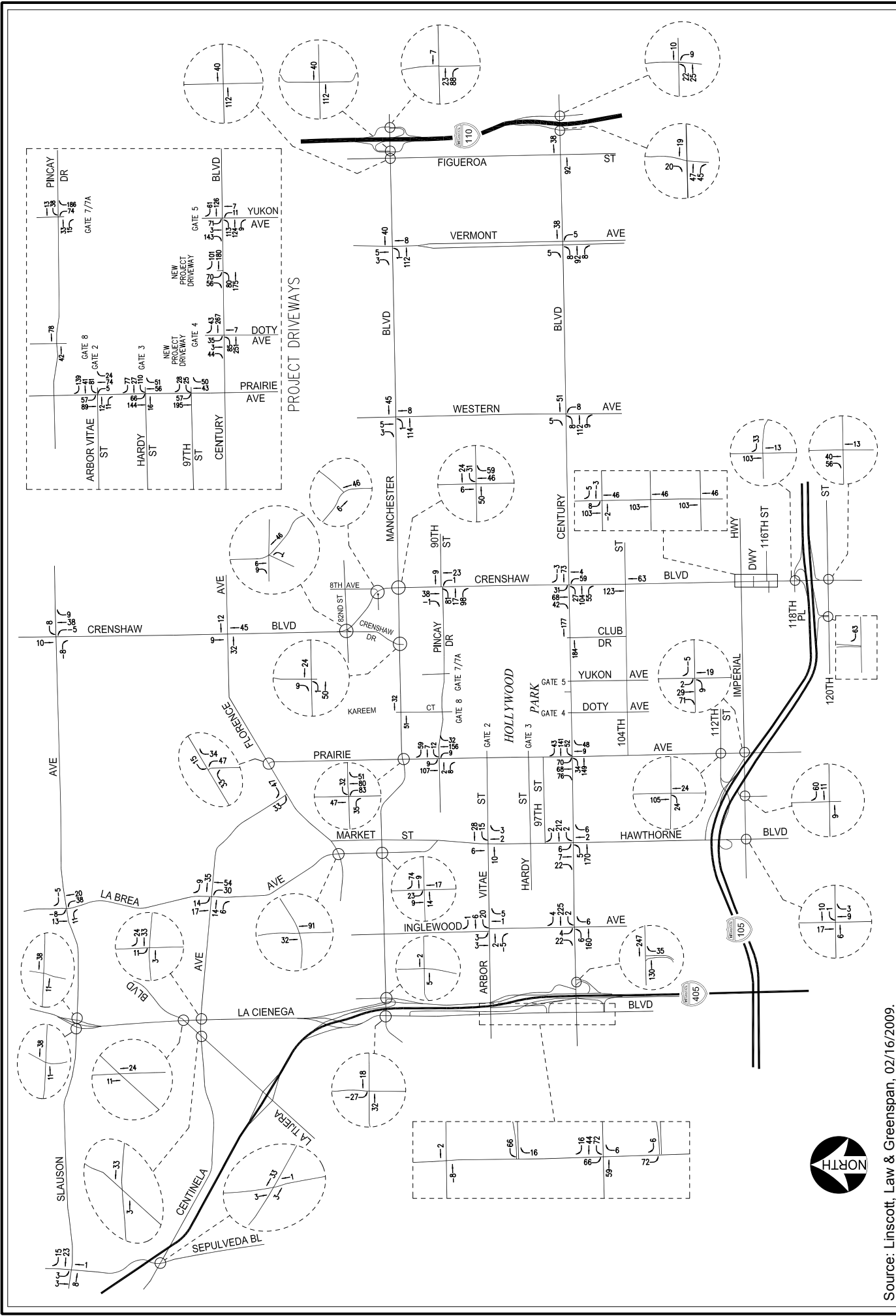
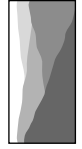
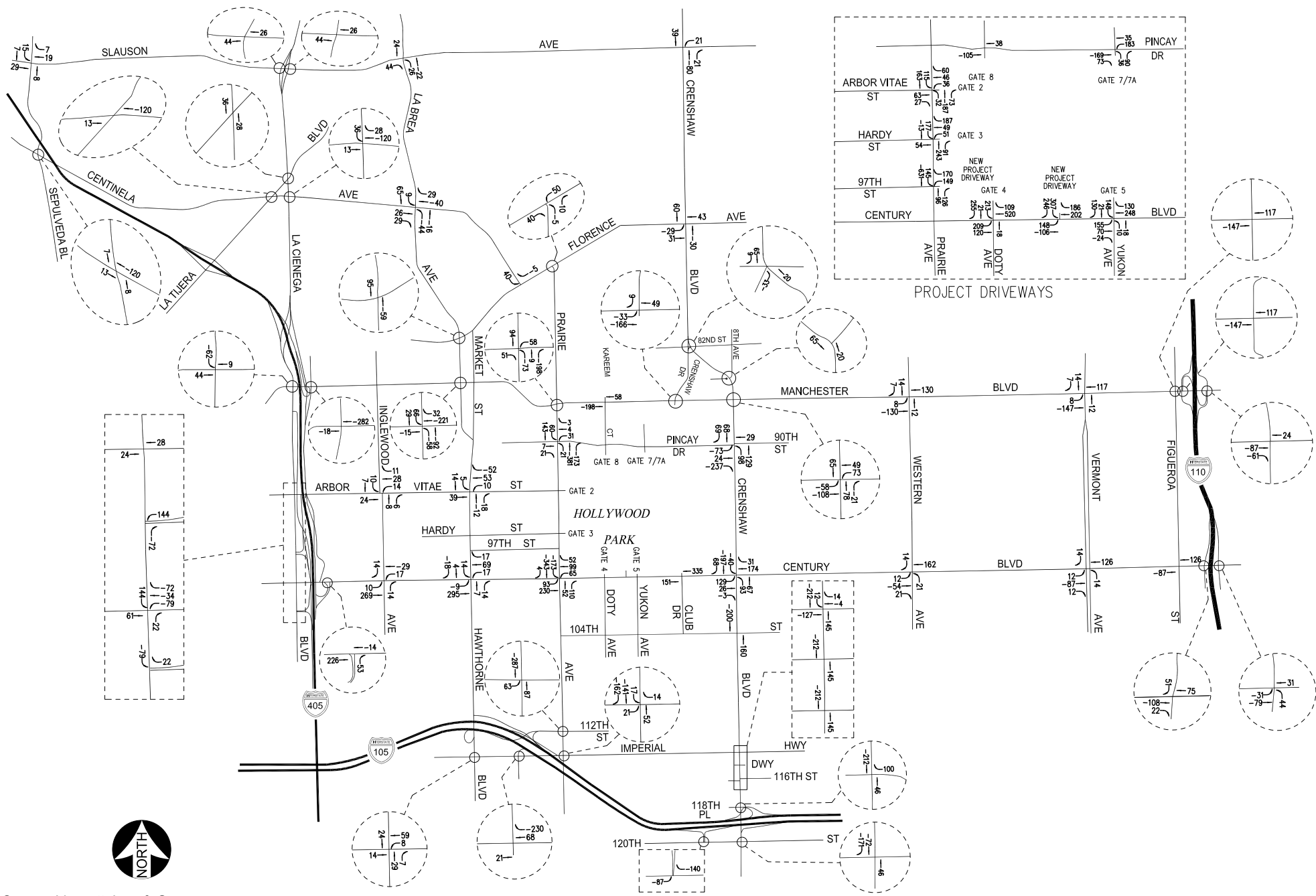


Figure IV.L-7 [REVISED]
Project Traffic Volumes
Weekday AM Peak Hour

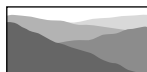
Source: Linscott, Law & Greenspan, 02/16/2009.

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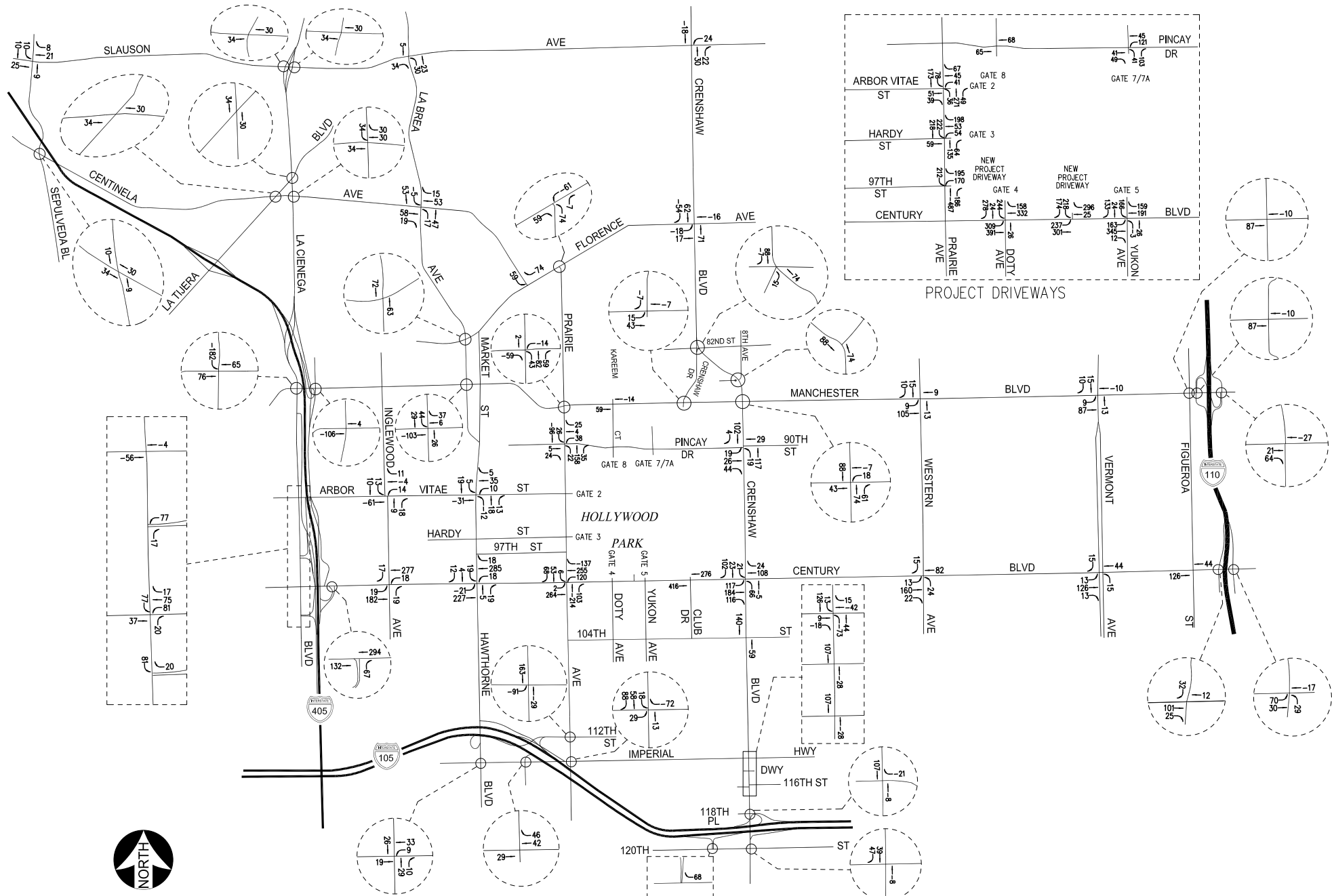


Source: Linscott, Law & Greenspan, 02/16/2009.

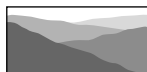


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Figure IV.L-8 [REVISED]
Project Traffic Volumes
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, 02/16/2009.



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Figure IV.L-9 [REVISED]
Project Traffic Volumes
Saturday Mid-Day Peak Hour

Cumulative Development Projects

A forecast of on-street cumulative traffic conditions was prepared by incorporating the potential trips associated with other known development projects (i.e., “Related Projects”) in the area. With this information, the potential impact of the proposed project and other development projects can be evaluated within the context of the cumulative impact of all ongoing development. The Related Projects research was based on information ~~on file at the~~ provided by the City of Inglewood, City of Culver City, City of Hawthorne, City of Los Angeles, and County of Los Angeles Planning Departments. The Related Projects used is shown in Table 3 of the Updated Traffic Impact Analysis, whereas the cumulative analysis for the environmental impacts in Section IV is based upon Table III-1, located in Section III. The update to two key related development projects in the immediate vicinity of Hollywood Park have been incorporated in the Updated traffic impact analysis. The Inglewood Promenade Project (included as Related Project No. I-1 in Table III-1) and the Home Stretch Project (included as Related Project No. I-19). The Inglewood Promenade Project was updated to reflect changes in land uses and quantities pursuant to the Inglewood Promenade’s Initial Study (Project Description). The Home Stretch project was removed because the project continues to remain inactive, with no planning application or project actions filed with the City of Inglewood in the past three years. The list of Related Projects in the area is shown in Table III-1, located in Section III. The location of the Related Projects is displayed in Figure III-1, also in Section III.

The Related Projects list for planning purposes included potential City of Inglewood redevelopment projects for which no planning applications have been filed with the City. These added projects were considered for planning purposes even though they have not been applied for in the horizon of the proposed project, because it is possible that the potential applicants may file these projects for consideration. Land use information for some of these sizable projects (i.e., the Forum site, ~~the Home Stretch Project~~, etc.) was obtained based on discussions with potential applicants and are considered to be speculative in the short term. Although some of the Related Projects may never be pursued or developed, the Traffic Impact Study conservatively assumes their traffic in the cumulative analysis conditions and therefore represents a worst-case analysis. It should be noted that the potential expansion of the Los Angeles International Airport (i.e., the LAX Master Plan) was listed as a related project. However, separate trip generation forecasts have not been developed as its future growth is uncertain at this time and is too speculative to analyze. In addition, the LAX Master Plan is a long term concept for possible future growth and expansion of the facility and has not yet been defined as a specific project while the Hollywood Park Redevelopment project will be developed on a relatively short term basis. It should be noted that although no separate trip generation forecasts have been developed for the LAX Master Plan, this traffic analysis does consider continued growth of the airport through the application of the ambient traffic growth factor.

Traffic volumes expected to be generated by the Related Projects were estimated using accepted generation rates published in the ITE Trip Generation manual. The Related Projects respective traffic generation for the AM and PM peak hours, as well as on a daily basis for a typical weekday, is also presented in detail in the Traffic Impact Study. The Related Projects respective traffic generation for the

weekend mid-day peak hour, as well as on a daily basis for a typical weekend day, is presented in the study.

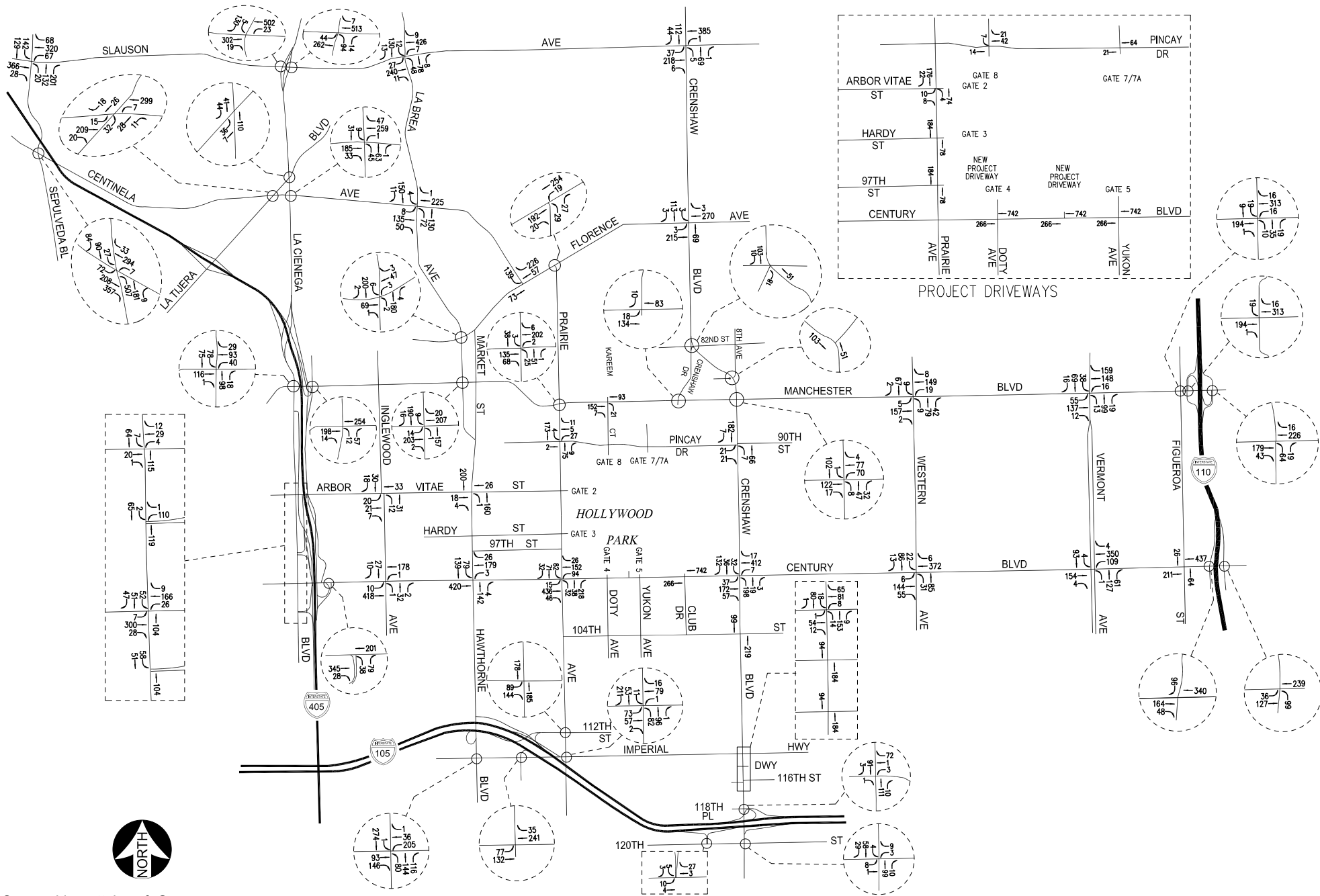
The anticipated distribution of the Related Projects traffic volumes at the 66 study intersections during the weekday AM peak hour, weekday PM peak hour, and Saturday mid-day peak hour are displayed in Figures IV.L-10, IV.L-11, and IV.L-12, respectively. ~~Three sizeable Related Projects in which no planning applications have been filed with the City of Inglewood include the Inglewood Promenade project (Related Project No. I-1), the Forum Site project (Related Project No. I-17), and the Home Stretch project (Related Project No. I-19). Although these sizeable Related Projects represent only three of the 36 related development projects located within the City of Inglewood, they are forecast to account for approximately 74% of the total weekday daily, 57% of the total weekday AM peak hour, and 74% of the total weekday PM peak hour traffic expected to be generated by all potential development projects from the City of Inglewood. Similarly, these three sizeable projects are forecast to account for approximately 78% of the total Saturday daily and 79% of the total Saturday mid-day peak hour traffic expected to be generated by all potential development projects from the City of Inglewood. As indicated above, this traffic impact study conservatively assumes traffic associated with these projects where no planning applications have been filed with the City of Inglewood in the cumulative analysis conditions and therefore represents a worst case analysis.~~

In order to account for unknown Related Projects not included in this analysis, the existing traffic volumes were increased at an annual rate of 0.65 percent (0.65%) per year to the year 2014 (i.e., the anticipated year of project build-out). Application of this annual ambient growth factor allows for a conservative worst case forecast of future traffic volumes in the area. A review of the background traffic growth estimates for this area published in the 2004 Congestion Management Program for Los Angeles County, indicate that existing traffic volumes would be expected to increase at an annual rate of approximately 0.65 percent (0.65% per year) between 2005 and 2015. Thus, the annual growth rate of 0.65 percent (0.65%) per year to the year 2014 is consistent and appropriate.

Traffic Impact Analysis Methodology

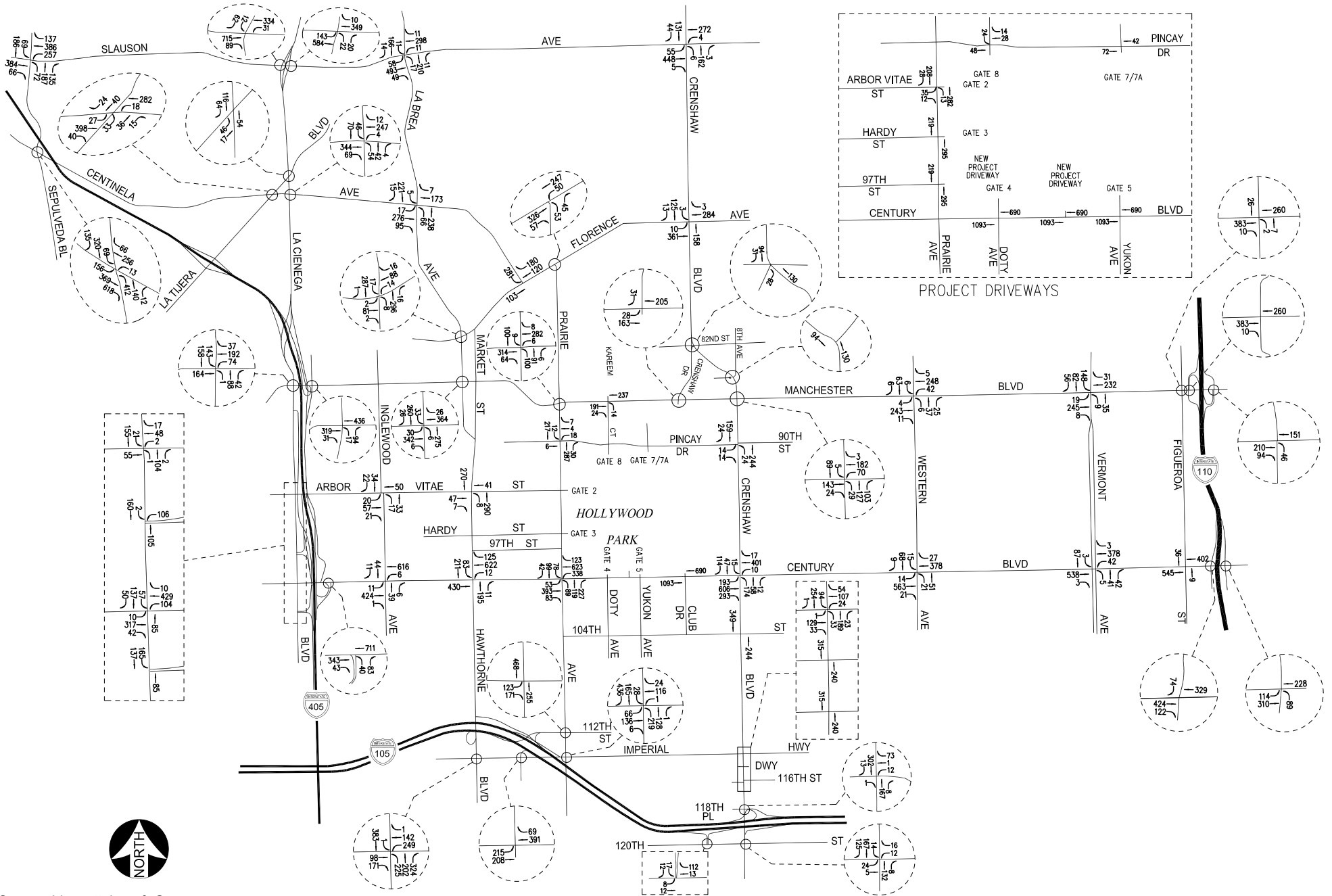
The 66 study intersections were evaluated using the Intersection Capacity Utilization (ICU) method of analysis which determines Volume-to-Capacity (v/c) ratios on a critical lane basis. The ICU method is required for use by the City of Inglewood. Twenty-eight (28) of the 66 study intersections are located in neighboring cities or unincorporated County of Los Angeles boundaries adjacent to the City of Inglewood.

In addition to the traffic analysis using the City of Inglewood ICU methodology, a supplemental traffic analysis was prepared for those study intersections located outside of City of Inglewood. The supplemental traffic analysis was prepared using the methodologies of the respective jurisdictions where the intersections are located. Specifically, the Critical Movement Analysis (CMA) method was used to determine Volume-to-Capacity ratios and corresponding Levels of Service at the 19 study intersections located in the City of Los Angeles and the one study intersection located in the City of Culver City. The

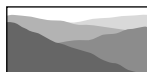


Source: Linscott, Law & Greenspan, 02/16/2009.

Figure IV.L-10 [REVISED]
Related Projects Traffic Volumes
Weekday AM Peak Hour

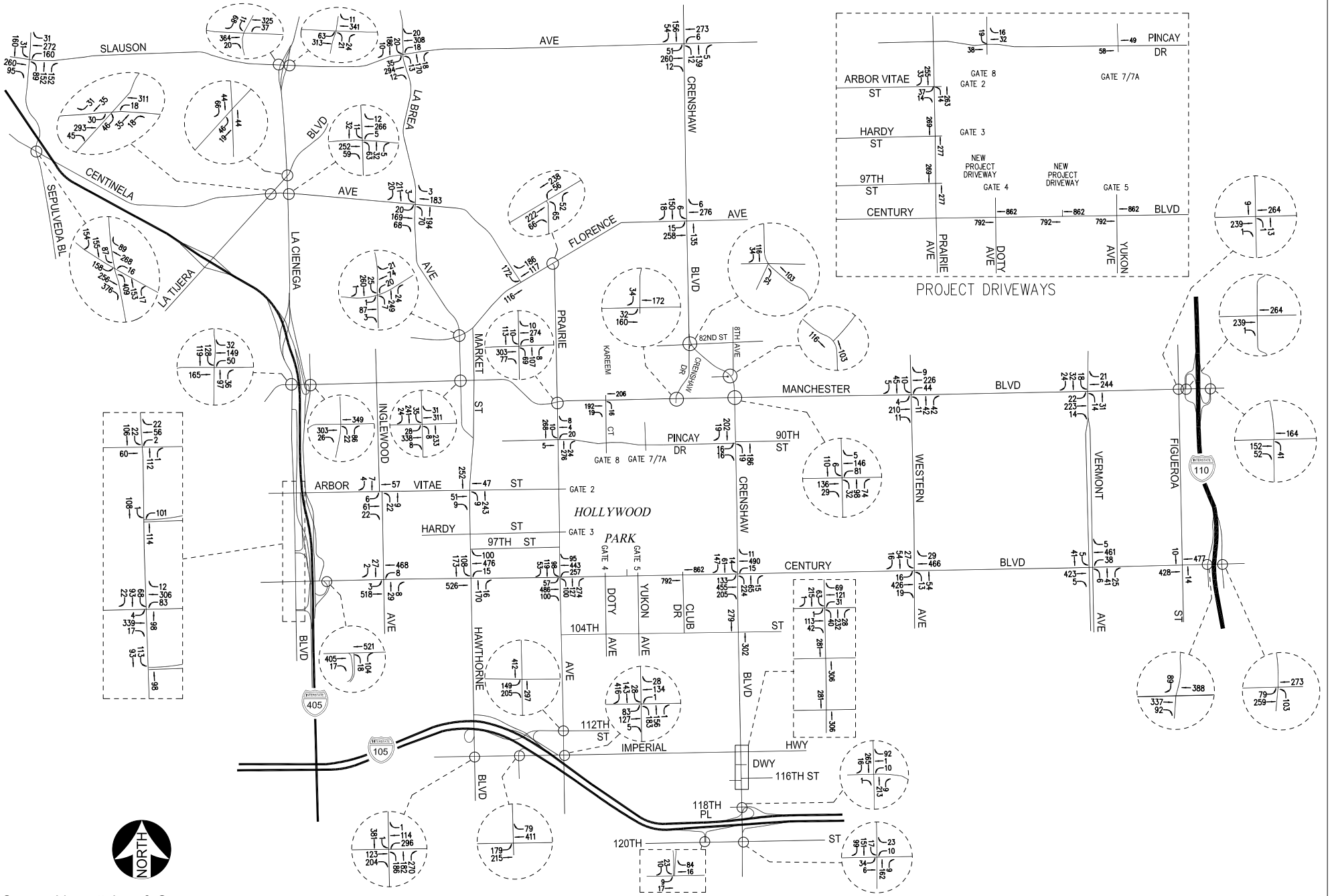


Source: Linscott, Law & Greenspan, 02/16/2009.



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Figure IV.L-11 [REVISED]
Related Projects Traffic Volumes
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, 02/16/2009.

Figure IV.L-12 [REVISED]
Related Projects Traffic Volumes
Saturday Mid-Day Peak Hour

ICU method was used to determine Volume-to-Capacity ratios and corresponding Levels of Service at the five study intersections located in the City of Hawthorne and the three study intersections located in the County of Los Angeles.

For both the ICU and CMA methodologies, the overall intersection v/c ratio is subsequently assigned a Level of Service (LOS) value to describe intersection operations. The Levels of Service varies from LOS A (free flow) to LOS F (jammed condition). It should be noted that LOS D is typically recognized as the minimum acceptable level of service in urban areas. A description of both the ICU and CMA methods and corresponding Levels of Service is provided in detail in the Traffic Impact Study.

ENVIRONMENTAL IMPACTS

Impact Criteria and Thresholds

The relative impact of the added project traffic volumes expected to be generated by the proposed project during the weekday AM peak hour, PM peak hour, and the Saturday mid-day peak hour was evaluated based on analysis of future operating conditions at the 66 study intersections, without and with the proposed project. The previously discussed capacity analysis procedures were utilized to evaluate the future v/c relationships and service level characteristics at each study intersection.

Each study intersection was evaluated for potential traffic impacts using the City of Inglewood significant traffic impact thresholds. Additionally, each study intersection outside the City of Inglewood was evaluated on a supplemental basis using the significant traffic impact criteria utilized in the jurisdiction of the intersection (e.g., study intersections in the City of Los Angeles were evaluated for potential traffic impacts using the criteria of the Lead Agency, the City of Inglewood, as well as the City of Los Angeles). However, it should be noted that the Updated Traffic Impact Analysis does not include evaluation of the traffic impacts based on the significant traffic impact criteria utilized in the jurisdiction of the intersection.

City of Inglewood Impact Criteria

Per the City of Inglewood's policy, the significance of the potential impacts of project generated traffic at each study intersection was identified using criteria set forth in the 2004 Congestion Management Program for Los Angeles County, County of Los Angeles Metropolitan Transportation Authority, July 2004 (CMP) manual. A significant transportation impact is determined based on a change in the calculated v/c ratio of two percent (0.02) or more due to project-related traffic for an intersection operating at LOS F or worse ($v/c > 1.00$).

Using these criteria, for example, the project would not have a significant impact on an intersection if it is operating at LOS E or better after the addition of project traffic. However, if the intersection is operating at LOS F after the addition of project traffic and the project related increase in v/c ratio is 0.020 or more, then a significant project impact would result at the intersection. These criteria were applied to all 66 study intersections.

The ICU calculations utilize a lane capacity of 1,600 vehicles per hour (vph) for left-turn, through and right-turn lanes, a dual turn lane capacity of 2,880 vph and a clearance of 0.10, and are consistent with the City of Inglewood criteria.

As previously mentioned, an annual rate of 0.65 percent (0.65%) ambient growth rate was assumed to account for unknown Related Projects in the vicinity of the proposed project. Additionally, it was assumed that the proposed project will be completed and occupied by the year 2014.

Adjacent cities have different criteria and methodologies for measuring traffic impacts. For informational purposes, the Traffic Impact Study presents additional impact analyses utilizing those other cities' respective criteria.

Traffic Impact Analysis Scenarios

Level of Service calculations at all 66 study intersections were analyzed for the following impact analysis conditions, which are consistent with methodologies required by the County of Los Angeles:

- (a) Existing conditions.
- (b) Condition (a) with 0.65 percent (0.65%) ambient traffic growth through year 2014.
- (c) Condition (b) with completion and occupancy of the proposed project.
- (d) Condition (c) with implementation of project mitigation measures, where necessary.
- (e) Condition (d) with completion and occupancy of the Related Projects, without any potential mitigation measures from the Related Projects.
- (f) Condition (e) with implementation of cumulative mitigation measures, where necessary.

The traffic volumes for each new condition were added to the volumes in the prior condition to determine the change in capacity utilization at the 66 study intersections.

Traffic Impact Analysis Method

A methodology used by some agencies involves a future baseline condition whereby traffic associated with ambient growth as well as Related Projects is considered in the traffic analysis prior to the consideration of the potential traffic impacts associated with the proposed project. This alternative methodology is not recommended for consideration by the decision makers for this project as this methodology substantially over-states the future pre-project traffic levels of congestion due to the requirement to include traffic associated with all of the Related Projects, many of which are highly speculative, may never be pursued or developed, and indeed in several cases have not even been applied for (refer to Section III, Related Projects for a discussion of cumulative development projects and inclusion of Related Projects with no planning applications filed at the City of Inglewood). Further, this

methodology requires Related Projects traffic be included in the future baseline conditions but not any of the potential mitigation measures associated with the Related Projects. As a result, this methodology places an undue burden on the proposed project to essentially mitigate its traffic effects, plus the adverse effects caused by the Related Projects.

The Traffic Impact Study for this EIR utilizes the traffic impact analysis methodology consistent with and required by the County of Los Angeles. This methodology utilized in this traffic analysis appropriately considers traffic generated by the proposed project in a future baseline generated by reasonably foreseeable ambient traffic growth and requires the project to mitigate its direct impacts under this future condition. In addition, the proposed project is required to contribute on a fair share basis to improvements associated with potential impacts caused on a cumulative basis by the project and the Related Projects. This methodology is applied to all 66 study intersections. For the results of the traffic analysis using alternative methodologies please see the Traffic Impact Study.

CITY OF INGLEWOOD TRAFFIC ANALYSIS

The traffic impact analysis prepared for all 66 study intersections using the ICU methodology and application of the City of Inglewood significant traffic impact criteria is summarized in Table IV.L-2. The ICU data worksheets for the analyzed intersections are contained in detail in the Traffic Impact Study.

Existing Conditions

Weekday Existing Conditions

As indicated in Table IV.L-2, 17 of the 65 existing study intersections are presently operating at LOS E or worse during the weekday AM and/or PM peak hours under existing conditions. The remaining 48 existing study intersections are currently operating at LOS D or better during both the weekday AM and PM peak hours. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are displayed in Figures IV.L-4 and IV.L-5, respectively.

Saturday Existing Conditions

As indicated in Table IV.L-2, four of the 65 existing study intersections are presently operating at LOS E or worse during the Saturday mid-day peak hour under existing conditions. The remaining 61 existing study intersections are currently operating at LOS D or better during the Saturday mid-day peak hour. As previously mentioned, the existing traffic volumes at the study intersections during the Saturday mid-day peak hour are displayed in Figure IV.L-6.

Table IV.L-2 [REVISED]

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	
1	Sepulveda Boulevard/ Slauson Avenue ^a	AM	0.704	C	0.739	C	0.750	C	0.011	0.750	C	0.011	0.944	E	0.205	0.887	D	0.148
	PM	0.721	C	0.757	C	0.762	C	0.005	0.762	C	0.005	1.054	F	0.297	0.980	E	0.223	
	SAT	0.710	C	0.746	C	0.756	C	0.010	0.756	C	0.010	0.901	E	0.155	0.834	D	0.088	
2	Sepulveda Boulevard/ Centinela Avenue ^b	AM	0.762	C	0.800	C	0.811	D	0.011	0.811	D	0.011	1.153	F	0.353	0.949	E	0.149
	PM	0.839	D	0.881	D	0.885 <u>0.886</u>	D	0.004 <u>0.005</u>	0.885 <u>0.886</u>	D	0.004 <u>0.005</u>	1.176 <u>1.177</u>	F	0.295 <u>0.296</u>	0.985	E	0.104	
	SAT	0.665	B	0.698	B	0.709	C	0.011	0.709	C	0.011	1.094	F	0.396	0.887	D	0.189	
3	La Cienega Boulevard (SB)/Slauson Avenue ^c	AM	0.704	C	0.736	C	0.744	C	0.008	0.744	C	0.008	0.890	D	0.154	0.790	C	0.054
	PM	0.850	D	0.889	D	0.898	D	0.009	0.898	D	0.009	1.076	F	0.187 <u>0.189</u>	0.976 <u>0.978</u>	E	0.087 <u>0.089</u>	
	SAT	0.711	C	0.743	C	0.750	C	0.007	0.750	C	0.007	0.855 <u>0.856</u>	D	0.112 <u>0.121</u>	0.755 <u>0.764</u>	C	0.012 <u>0.021</u>	
4	La Cienega Boulevard (NB)/Slauson Avenue ^c	AM	0.730	C	0.762	C	0.770	C	0.008	0.770	C	0.008	0.921	E	0.159	0.921	E	0.159
	PM	0.613	B	0.640	B	0.645	B	0.005	0.645	B	0.005	0.780	C	0.140	0.780	C	0.140	
	SAT	0.583	A	0.608	B	0.614	B	0.006	0.614	B	0.006	0.714	C	0.106	0.714	C	0.106	
5	La Tijera Boulevard/ Centinela Avenue ^b	AM	0.853	D	0.896	D	0.906	E	0.010	0.906	E	0.010	1.029	F	0.133	0.999	E	0.103
	PM	0.823	D	0.864	D	0.821 <u>0.827</u>	D	-0.043 <u>0.037</u>	0.821 <u>0.827</u>	D	-0.043 <u>0.037</u>	0.936 <u>0.942</u>	E	0.072 <u>0.078</u>	0.906 <u>0.912</u>	E	0.042 <u>0.048</u>	
	SAT	0.769	C	0.807	D	0.817	D	0.010	0.817	D	0.010	0.898	D	0.091	0.868	D	0.061	
6	La Cienega Boulevard/ La Tijera Boulevard ^b	AM	0.739	C	0.776	C	0.779	C	0.003	0.779	C	0.003	0.798	C	0.022	0.798	C	0.022
	PM	0.864	D	0.907	E	0.915	E	0.008	0.915	E	0.008	0.953	E	0.046	0.953	E	0.046	
	SAT	0.668	B	0.701	C	0.708	C	0.007	0.708	C	0.007	0.731	C	0.030	0.731	C	0.030	
7	La Cienega Boulevard/ Centinela Avenue ^b	AM	0.959	E	1.008	F	1.018	F	0.010	1.018	F	0.010	1.134	F	0.126	1.007	F	-0.001
	PM	0.918	E	0.965	E	0.989 <u>0.990</u>	E	0.024 <u>0.025</u>	0.989 <u>0.990</u>	E	0.024 <u>0.025</u>	1.116 <u>1.117</u>	F	0.151 <u>0.152</u>	0.998	E	0.033	
	SAT	0.828	D	0.869	D	0.876	D	0.007	0.876	D	0.007	0.990	E	0.121	0.873	D	0.004	
8	La Cienega Boulevard/ Manchester Boulevard ^d	AM	1.005	F	1.052	F	1.051	F	-0.001	1.051	F	-0.001	1.441 <u>1.39</u>	F	0.089 <u>0.087</u>	1.441 <u>1.39</u>	F	0.089 <u>0.087</u>
	PM	0.815	D	0.852	D	0.851 <u>0.852</u>	D	-0.004 <u>0.000</u>	0.851 <u>0.852</u>	D	-0.004 <u>0.000</u>	1.023 <u>0.999</u>	F	0.171 <u>0.147</u>	1.023 <u>0.999</u>	F	0.171 <u>0.147</u>	
	SAT	0.726	C	0.759	C	0.741 <u>0.746</u>	C	-0.018 <u>0.013</u>	0.741 <u>0.746</u>	C	-0.018 <u>0.013</u>	0.914 <u>0.878</u>	E	0.152 <u>0.119</u>	0.914 <u>0.878</u>	E	0.152 <u>0.119</u>	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	
9	I-405 Freeway NB Ramps/Manchester Boulevard ^d	AM	0.884	D	0.925	E	0.925	E	0.000	0.925	E	0.000	0.985982	E	0.060057	0.985982	E	0.060057
	PM	0.681	B	0.711	C	0.704705	C	-0.007006	0.704705	C	-0.007006	0.865828	D	0.154117	0.865828	D	0.154117	
	SAT	0.569	A	0.593	A	0.593594	A	0.000001	0.593594	A	0.000001	0.725689	CB	0.132096	0.725689	CB	0.132096	
10	La Cienega Boulevard/Arbor Vitae Street ^d	AM	0.800	C	0.836	D	0.837	D	0.001	0.837	D	0.001	0.870866	D	0.034030	0.770776	C	-0.066
	PM	0.961	E	1.006	F	1.014	F	0.008	1.014	F	0.008	1.104081	F	0.098075	1.0040981	FE	-0.002025	
	SAT	0.509	A	0.531	A	0.508513	A	-0.023018	0.508513	A	-0.023018	0.644582	BA	0.080051	0.544482	A	-0.020049	
11	La Cienega Boulevard/I-405 Freeway SB Ramps (n/o Century Boulevard) ^b	AM	0.837	D	0.879	D	0.899	D	0.020	0.899	D	0.020	0.959	E	0.080	0.959	E	0.080
	PM	0.610	B	0.640	B	0.685	B	0.045	0.685	B	0.045	0.761	C	0.121	0.761	C	0.121	
	SAT	0.465	A	0.488	A	0.507	A	0.019	0.507	A	0.019	0.591	A	0.103	0.591	A	0.103	
12	La Cienega Boulevard/Century Boulevard ^b	AM	0.733	C	0.770	C	0.821	D	0.051	0.821	D	0.051	0.886	D	0.116	0.856	D	0.086
	PM	0.690	B	0.724	C	0.774	C	0.050	0.774	C	0.050	1.023	F	0.299	0.993	E	0.269	
	SAT	0.530	A	0.556	A	0.648	B	0.092	0.648	B	0.092	0.980	E	0.424	0.950	E	0.394	
13	La Cienega Boulevard/I-405 Freeway SB Ramps (s/o Century Boulevard) ^b	AM	0.455	A	0.477	A	0.504	A	0.027	0.504	A	0.027	0.555	A	0.078	0.555	A	0.078
	PM	0.577	A	0.605	B	0.576	A	-0.029	0.576	A	-0.029	0.658	B	0.053	0.658	B	0.053	
	SAT	0.385	A	0.404	A	0.438	A	0.034	0.438	A	0.034	0.526	A	0.122	0.526	A	0.122	
14	I-405 Freeway NB Ramps/Century Boulevard ^d	AM	0.814	D	0.851	D	0.902	E	0.051	0.902	E	0.051	0.954	E	0.103	0.854	D	0.003
	PM	0.661	B	0.690	B	0.766	C	0.076	0.766	C	0.076	0.945	E	0.255	0.845	D	0.155	
	SAT	0.446	A	0.464	A	0.506	A	0.042	0.506	A	0.042	0.788	C	0.324	0.688	B	0.224	
15	Inglewood Avenue/Arbor Vitae Street ^d	AM	0.930	E	0.973	E	0.983	E	0.010	0.983	E	0.010	1.073	F	0.100	0.922	E	-0.051
	PM	0.913	E	0.955	E	0.992	E	0.037	0.992	E	0.037	1.130	F	0.175	0.906	E	-0.049	
	SAT	0.688	B	0.718	C	0.701	C	-0.017	0.701	C	-0.017	0.821	D	0.103	0.821	D	0.103	
16	Inglewood Avenue/Century Boulevard ^d	AM	0.744	C	0.777	C	0.831	D	0.054	0.831	D	0.054	0.893	D	0.116	0.793	C	0.016
	PM	0.780	C	0.816	D	0.881	D	0.065	0.881	D	0.065	1.041	F	0.225	0.941	E	0.125	
	SAT	0.590	A	0.615	B	0.673	B	0.058	0.673	B	0.058	0.856	D	0.241	0.756	C	0.141	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	
17	La Brea Avenue/ Slauson Avenue ^c	AM	0.768	C	0.803	D	0.829	D	0.026	0.829	D	0.026	0.997	E	0.194	0.856	D	0.053
	PM	0.895	D	0.937	E	0.969	E	0.032	0.969	E	0.032	1.170	F	0.233	0.973	E	0.036	
	SAT	0.800	C	0.837	D	0.855	D	0.018	0.855	D	0.018	1.069	F	0.232	0.898	D	0.061	
18	La Brea Avenue/ Centinela Avenue ^d	AM	0.925	E	0.968	E	1.004	F	0.036	0.904	E	-0.064	1.043	F	0.075	1.043	F	0.075
	PM	0.829	D	0.867	D	0.868	D	0.001	0.768	C	-0.099	0.981	E	0.114	0.981	E	0.114	
	SAT	0.886	D	0.927	E	0.971	E	0.044	0.871	D	-0.056	1.086	F	0.159	1.086	F	0.159	
19	La Brea Avenue/ Florence Avenue ^d	AM	1.153	F	1.208	F	1.236	F	0.028	1.136	F	-0.072	1.215	F	0.007	1.215	F	0.007
	PM	1.109	F	1.162	F	1.192	F	0.030	1.092	F	-0.070	1.248	F	0.086	1.248	F	0.086	
	SAT	0.716	C	0.748	C	0.768	C	0.020	0.668	B	-0.080	0.839	D	0.091	0.839	D	0.091	
20	La Brea Avenue/ Manchester Boulevard ^d	AM	0.916	E	0.959	E	0.981	E	0.022	0.981	E	0.022	1.115	F	0.156	0.917	E	-0.042
	PM	0.754	C	0.788	C	0.770	C	-0.018	0.770	C	-0.018	1.036	F	0.248	0.903	E	0.115	
	SAT	0.848	D	0.887	D	0.923	E	0.036	0.923	E	0.036	1.223	F	0.336	0.971	E	0.084	
21	La Brea Avenue/ Arbor Vitae Street ^d	AM	0.643	B	0.671	B	0.686	B	0.015	0.686	B	0.015	0.751	C	0.080	0.751	C	0.080
	PM	0.787	C	0.822	D	0.855	D	0.033	0.855	D	0.033	0.999	E	0.177	0.999	E	0.177	
	SAT	0.637	B	0.665	B	0.637	B	-0.028	0.637	B	-0.028	0.807	D	0.142	0.807	D	0.142	
22	La Brea Avenue/ Century Boulevard ^d	AM	0.783	C	0.819	D	0.871	D	0.052	0.771	C	-0.048	0.862	D	0.043	0.862	D	0.043
	PM	0.893	D	0.934	E	1.001	F	0.067	0.901	E	-0.033	1.101	F	0.167	1.101	F	0.167	
	SAT	0.738	C	0.771	C	0.824	D	0.053	0.724	C	-0.047	1.008	F	0.237	1.008	F	0.237	
23	Hawthorne Boulevard/ Imperial Highway ^c	AM	0.799	C	0.835	D	0.841	D	0.006	0.841	D	0.006	0.940	E	0.105	0.756	C	-0.079
	PM	0.910	E	0.952	E	0.964	E	0.012	0.964	E	0.012	1.385	F	0.433	0.987	E	0.035	
	SAT	0.599	A	0.625	B	0.641	B	0.016	0.641	B	0.016	0.950	E	0.325	0.653	B	0.028	
24	Centinela Avenue/ Florence Avenue ^d	AM	0.950	E	0.994	E	1.005	F	0.011	1.005	F	0.011	1.073	F	0.079	0.917	E	-0.077
	PM	0.942	E	0.985	E	0.998	E	0.013	0.998	E	0.013	1.143	F	0.158	0.919	E	-0.066	
	SAT	0.694	B	0.725	C	0.743	C	0.018	0.743	C	0.018	0.851	D	0.126	0.703	C	-0.022	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
25	Prairie Avenue/ Florence Avenue ^d	AM	0.984	E	1.030	F	1.056	F	0.026	0.956	E	-0.074	1.023	F	-0.007	1.023	F	-0.007
	PM	0.975	E	1.020	F	1.045	F	0.025	0.945	E	-0.075	1.085	F	0.065	1.085	F	0.065	
	SAT	0.634	B	0.662	B	0.637	B	-0.025	0.537	A	-0.125	0.671	B	0.009	0.671	B	0.009	
26	Prairie Avenue/ Manchester Boulevard ^d	AM	0.688	B	0.719	C	0.744	C	0.025	0.744	C	0.025	0.839	D	0.120	0.739	C	0.020
	PM	0.901	E	0.942	E	0.983	E	0.041	0.983	E	0.041	1.174	F	0.232	0.985	E	0.043	
	SAT	0.719	C	0.751	C	0.733	C	-0.018	0.733	C	-0.018	0.965	E	0.214	0.831	D	0.080	
27	Prairie Avenue/ Kelso Street-Pincay Drive ^d	AM	0.554	A	0.577	A	0.659	B	0.082	0.659	B	0.082	0.708	C	0.131	0.708	C	0.131
	PM	0.769	C	0.804	D	0.736	C	-0.068	0.736	C	-0.068	0.964	E	0.160	0.964	E	0.160	
	SAT	0.520	A	0.541	A	0.636	B	0.095	0.636	B	0.095	0.931	E	0.390	0.931	E	0.390	
28	Prairie Avenue/ Arbor Vitae Street-Gate 2 ^d	AM	0.553	A	0.576	A	0.603	B	0.027	0.603	B	0.027	0.674	B	0.098	0.674	B	0.098
	PM	0.794	C	0.826	D	0.740	C	-0.086	0.740	C	-0.086	0.904	E	0.078	0.904	E	0.078	
	SAT	0.731	C	0.751	C	0.643	B	-0.108	0.643	B	-0.108	0.850	D	0.099	0.850	D	0.099	
29	Prairie Avenue/ Hardy Street-Gate 3 ^d	AM	0.449	A	0.467	A	0.538	A	0.071	0.538	A	0.071	0.571	A	0.104	0.571	A	0.104
	PM	0.760	C	0.785	C	0.644	B	-0.141	0.644	B	-0.141	0.724	C	-0.061	0.724	C	-0.061	
	SAT	0.739	C	0.754	C	0.634	B	-0.120	0.634	B	-0.120	0.730	C	-0.024	0.730	C	-0.024	
30	Prairie Avenue/ Century Boulevard ^d	AM	0.814	D	0.851	D	0.885	D	0.034	0.885	D	0.034	1.028	F	0.177	0.928	E	0.077
	PM	0.982	E	1.028	F	1.017	F	-0.011	1.017	F	-0.011	1.465	F	0.437	1.365	F	0.337	
	SAT	0.964	E	1.009	F	0.997	E	-0.012	0.997	E	-0.012	1.664	F	0.655	1.564	F	0.555	
31	Prairie Avenue/ I-105 Freeway EB -WB Off Ramps- 112th Street ^d	AM	0.668	B	0.697	B	0.728	C	0.031	0.728	C	0.031	0.819	D	0.122	0.819	D	0.122
	PM	0.756	C	0.790	C	0.713	C	-0.077	0.713	C	-0.077	0.926	E	0.136	0.926	E	0.136	
	SAT	0.669	B	0.699	B	0.731	C	0.032	0.731	C	0.032	0.990	E	0.291	0.990	E	0.291	
32	I-105 Freeway EB On Ramp-Freeman Avenue/Imperial Highway ^e	AM	0.699	B	0.730	C	0.741	C	0.011	0.741	C	0.011	0.832	D	0.102	0.832	D	0.102
	PM	0.548	A	0.572	A	0.538	A	-0.034	0.538	A	-0.034	0.749	C	0.177	0.749	C	0.177	
	SAT	0.546	A	0.570	A	0.583	A	0.013	0.583	A	0.013	0.785	C	0.215	0.785	C	0.215	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS		V/C	LOS		V/C	LOS		
33	Prairie Avenue/ Imperial Highway ^e	AM	0.868	D	0.908	E	0.922	E	0.014	0.922	E	0.014	1.005	F	0.097	0.905	E	-0.003
	PM	0.872	D	0.912	E	0.868	D	-0.044	0.868	D	-0.044	1.020	F	0.108	0.920	E	0.008	
	SAT	0.686	B	0.717	C	0.734	C	0.017	0.734	C	0.017	0.985	E	0.268	0.885	D	0.168	
34	Cemetery Driveway- Kareem Court/ Manchester Boulevard ^d	AM	0.593	A	0.618	B	0.625	B	0.007	0.625	B	0.007	0.670	B	0.052	0.670	B	0.052
	PM	0.491	A	0.512	A	0.462	A	-0.050	0.462	A	-0.050	0.673	B	0.161	0.673	B	0.161	
	SAT	0.387	A	0.402	A	0.394	A	-0.008	0.394	A	-0.008	0.661	B	0.259	0.661	B	0.259	
35	Crenshaw Drive-Briarwood Lane/ Manchester Boulevard ^d	AM	0.913	E	0.955	E	0.969	E	0.014	0.969	E	0.014	1.024	F	0.069	0.924	E	-0.031
	PM	0.552	A	0.576	A	0.569	A	-0.007	0.569	A	-0.007	0.718	C	0.142	0.618	B	0.042	
	SAT	0.577	A	0.602	B	0.595	A	-0.007	0.595	A	-0.007	0.756	C	0.154	0.656	B	0.054	
36	Kareem Court-Gate 8 Pincay Drive ^d	AM	0.275	A	0.284	A	0.308	A	0.024	0.308	A	0.024	0.386	A	0.102	0.386	A	0.102
	PM	0.334	A	0.345	A	0.303	A	-0.042	0.303	A	-0.042	0.854	D	0.509	0.854	D	0.509	
	SAT	0.237	A	0.246	A	0.267	A	0.021	0.267	A	0.021	0.980	E	0.734	0.980	E	0.734	
37	Carlton Drive-Gate 7-7A Pincay Drive ^d	AM	0.310	A	0.319	A	0.463	A	0.144	0.463	A	0.144	0.507	A	0.188	0.507	A	0.188
	PM	0.332	A	0.339	A	0.421	A	0.082	0.421	A	0.082	0.539	A	0.200	0.539	A	0.200	
	SAT	0.306	A	0.312	A	0.426	A	0.114	0.426	A	0.114	0.562	A	0.250	0.562	A	0.250	
38	Doty Avenue-Gate 4/ Century Boulevard ^d	AM	0.410	A	0.424	A	0.513	A	0.089	0.513	A	0.089	0.578	A	0.154	0.478	A	0.054
	PM	0.590	A	0.608	B	0.758	C	0.150	0.758	C	0.150	0.964	E	0.356	0.864	D	0.256	
	SAT	0.650	B	0.662	B	0.796	C	0.134	0.796	C	0.134	1.085	F	0.423	0.985	E	0.323	
39	Yukon Avenue-Gate 5/ Century Boulevard ^d	AM	0.408	A	0.424	A	0.625	B	0.201	0.625	B	0.201	0.691	B	0.267	0.591	A	0.167
	PM	0.719	C	0.751	C	0.843	D	0.092	0.843	D	0.092	1.065	F	0.314	0.965	E	0.214	
	SAT	0.678	B	0.708	C	0.828	D	0.120	0.828	D	0.120	1.097	F	0.389	0.997	E	0.289	
40	Club Drive/ Century Boulevard ^d	AM	0.494	A	0.515	A	0.551	A	0.036	0.551	A	0.036	0.617	B	0.102	0.517	A	0.002
	PM	0.641	B	0.670	B	0.738	C	0.068	0.738	C	0.068	0.943	E	0.273	0.843	D	0.173	
	SAT	0.670	B	0.699	B	0.752	C	0.053	0.752	C	0.053	1.032	F	0.333	0.932	E	0.233	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	
41	Crenshaw Boulevard/ Slauson Avenue ^b	AM	0.815	D	0.852	D	0.851	D	-0.001	0.851	D	-0.001	1.025	F	0.173	0.955	E	0.103
	PM	0.769	C	0.803	D	0.824	D	0.021	0.824	D	0.021	1.028	F	0.225	0.958	E	0.155	
	SAT	0.965	E	1.010	F	1.003	F	-0.007	1.003	F	-0.007	1.202	F	0.192	1.132	F	0.122	
42	Crenshaw Boulevard/ Florence Avenue ^b	AM	0.784	C	0.820	D	0.832	D	0.012	0.832	D	0.012	0.909	E	0.089	0.839	D	0.019
	PM	0.750	C	0.784	C	0.802	D	0.018	0.802	D	0.018	0.930	E	0.146	0.860	D	0.076	
	SAT	0.790	C	0.826	D	0.827	D	0.001	0.827	D	0.001	1.021	F	0.195	0.951	E	0.125	
43	Crenshaw Boulevard/ 82nd Street-Crenshaw Drive ^d	AM	0.548	A	0.569	A	0.584	A	0.015	0.584	A	0.015	0.614	B	0.045	0.614	B	0.045
	PM	0.507	A	0.525	A	0.518	A	-0.007	0.518	A	-0.007	0.602	B	0.077	0.602	B	0.077	
	SAT	0.501	A	0.520	A	0.556	A	0.036	0.556	A	0.036	0.666	B	0.146	0.666	B	0.146	
44	Crenshaw Boulevard/ 8th Avenue ^d	AM	0.572	A	0.597	A	0.611	B	0.014	0.611	B	0.014	0.628	B	0.031	0.628	B	0.031
	PM	0.471	A	0.490	A	0.498	A	0.008	0.498	A	0.008	0.552	A	0.062	0.552	A	0.062	
	SAT	0.482	A	0.501	A	0.529	A	0.028	0.529	A	0.028	0.603	B	0.102	0.603	B	0.102	
45	Crenshaw Boulevard/ Manchester Boulevard ^d	AM	0.719	C	0.751	C	0.780	C	0.029	0.680	B	-0.071	0.729	C	-0.022	0.729	C	-0.022
	PM	0.947	E	0.991	E	1.015	F	0.024	0.915	E	-0.076	1.147	F	0.156	1.147	F	0.156	
	SAT	0.964	E	1.009	F	1.046	F	0.037	0.946	E	-0.063	1.231	F	0.222	1.231	F	0.222	
46	Crenshaw Boulevard/ Pincay Drive-90th Street ^d	AM	0.646	B	0.675	B	0.721	C	0.046	0.721	C	0.046	0.801	D	0.126	0.701	C	0.026
	PM	0.728	C	0.760	C	0.759	C	-0.001	0.759	C	-0.001	1.001	F	0.241	0.901	E	0.141	
	SAT	0.689	B	0.720	C	0.779	C	0.059	0.779	C	0.059	1.135	F	0.415	0.911	E	0.191	
47	Crenshaw Boulevard/ Century Boulevard ^d	AM	0.776	C	0.811	D	0.902	E	0.091	0.802	D	-0.009	0.929	E	0.118	0.632	B	-0.179
	PM	1.004	F	1.051	F	1.065	F	0.014	0.965	E	-0.086	1.381	F	0.330	0.897	D	-0.154	
	SAT	0.991	E	1.038	F	1.155	F	0.117	1.055	F	0.017	1.677	F	0.639	1.034	F	-0.004	
48	Crenshaw Boulevard/ Imperial Highway ^d	AM	0.806	D	0.842	D	0.864	D	0.022	0.864	D	0.022	0.913	E	0.071	0.813	D	-0.029
	PM	0.844	D	0.882	D	0.887	D	0.005	0.887	D	0.005	1.068	F	0.186	0.968	E	0.086	
	SAT	0.736	C	0.769	C	0.776	C	0.007	0.776	C	0.007	0.999	E	0.230	0.899	D	0.130	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS			
49	Crenshaw Boulevard/ Shopping Center Driveway (s/o Imperial Highway) ^d	AM	0.390	A	0.405	A	0.426	A	0.021	0.426	A	0.021	0.445	A	0.040	0.445	A	0.040
	PM	0.477	A	0.496	A	0.526	A	0.030	0.526	A	0.030	0.594	A	0.098	0.594	A	0.098	
	SAT	0.474	A	0.493	A	0.477	A	-0.016	0.477	A	-0.016	0.571	A	0.078	0.571	A	0.078	
50	Crenshaw Boulevard/ 116th Street ^d	AM	0.543	A	0.566	A	0.588	A	0.022	0.588	A	0.022	0.607	B	0.041	0.607	B	0.041
	PM	0.570	A	0.594	A	0.597	A	0.003	0.597	A	0.003	0.665	B	0.071	0.665	B	0.071	
	SAT	0.643	B	0.671	B	0.692	B	0.021	0.692	B	0.021	0.780	C	0.109	0.780	C	0.109	
51	Crenshaw Boulevard/ 118th Place-I-105 Freeway WB Ramps ^d	AM	0.739	C	0.772	C	0.794	C	0.022	0.794	C	0.022	0.823	D	0.051	0.823	D	0.051
	PM	0.763	C	0.798	C	0.761	C	-0.037	0.761	C	-0.037	0.857	D	0.059	0.857	D	0.059	
	SAT	0.720	C	0.753	C	0.763	C	0.010	0.763	C	0.010	0.883	D	0.130	0.883	D	0.130	
52	I-105 Freeway EB Ramps/ 120th Street ^e	AM	0.908	E	0.950	E	0.963	E	0.013	0.963	E	0.013	0.976	E	0.026	0.976	E	0.026
	PM	0.759	C	0.794	C	0.693	B	-0.101	0.693	B	-0.101	0.730	C	-0.064	0.730	C	-0.064	
	SAT	0.676	B	0.706	C	0.719	C	0.013	0.719	C	0.013	0.764	C	0.058	0.764	C	0.058	
53	Crenshaw Boulevard/ 120th Street ^e	AM	0.796	C	0.832	D	0.867	D	0.035	0.867	D	0.035	0.889	D	0.057	0.889	D	0.057
	PM	0.723	C	0.755	C	0.743	C	-0.012	0.743	C	-0.012	0.792	C	0.037	0.792	C	0.037	
	SAT	0.795	C	0.831	D	0.858	D	0.027	0.858	D	0.027	0.971	E	0.140	0.971	E	0.140	
54	Western Avenue/ Manchester Avenue ^b	AM	0.781	C	0.817	D	0.829	D	0.012	0.829	D	0.012	0.909	E	0.092	0.909	E	0.092
	PM	0.775	C	0.810	D	0.778	C	-0.032	0.778	C	-0.032	0.910	E	0.100	0.910	E	0.100	
	SAT	0.778	C	0.813	D	0.840	D	0.027	0.840	D	0.027	0.989	E	0.176	0.989	E	0.176	
55	Western Avenue/ Century Boulevard ^b	AM	0.760	C	0.794	C	0.816	D	0.022	0.816	D	0.022	0.908	E	0.114	0.838	D	0.044
	PM	0.778	C	0.814	D	0.865	D	0.051	0.865	D	0.051	1.024	F	0.210	0.954	E	0.140	
	SAT	0.692	B	0.723	C	0.761	C	0.038	0.761	C	0.038	0.954	E	0.231	0.884	D	0.161	
56	Vermont Avenue/ Manchester Avenue ^b	AM	0.864	D	0.903	E	0.914	E	0.011	0.914	E	0.011	1.056	F	0.153	0.903	E	0.000
	PM	0.919	E	0.962	E	0.983	E	0.021	0.983	E	0.021	1.171	F	0.209	0.981	E	0.019	
	SAT	0.674	B	0.704	C	0.733	C	0.029	0.733	C	0.029	0.867	D	0.163	0.620	B	-0.084	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS		V/C	LOS		V/C	LOS		
57	Vermont Avenue/ Century Boulevard ^b	AM	0.652	B	0.681	B	0.694	B	0.013	0.694	B	0.013	0.771	C	0.090	0.771	C	0.090
	PM	0.691	B	0.721	C	0.705	C	-0.016	0.705	C	-0.016	0.861	D	0.140	0.861	D	0.140	
	SAT	0.623	B	0.650	B	0.669	B	0.019	0.669	B	0.019	0.827	D	0.177	0.827	D	0.177	
58	Figueroa Street/ Manchester Avenue ^b	AM	0.762	C	0.800	C	0.808	D	0.008	0.808	D	0.008	0.892	D	0.092	0.892	D	0.092
	PM	0.711	C	0.746	C	0.707	C	-0.039	0.707	C	-0.039	0.843	D	0.097	0.843	D	0.097	
	SAT	0.762	C	0.800	C	0.787	C	-0.013	0.787	C	-0.013	0.924	E	0.124	0.924	E	0.124	
59	I-110 Freeway SB Ramps/Manchester Avenue ^b	AM	0.631	B	0.662	B	0.669	B	0.007	0.669	B	0.007	0.699	B	0.037	0.699	B	0.037
	PM	0.549	A	0.576	A	0.555	A	-0.021	0.555	A	-0.021	0.670	B	0.094	0.670	B	0.094	
	SAT	0.519	A	0.544	A	0.562	A	0.018	0.562	A	0.018	0.663	B	0.119	0.663	B	0.119	
60	I-110 Freeway NB Ramps/Manchester Avenue ^b	AM	0.743	C	0.780	C	0.781	C	0.001	0.781	C	0.001	0.842	D	0.062	0.842	D	0.062
	PM	0.596	A	0.625	B	0.630	B	0.005	0.630	B	0.005	0.687	B	0.062	0.687	B	0.062	
	SAT	0.584	A	0.613	B	0.604	B	-0.009	0.604	B	-0.009	0.672	B	0.059	0.672	B	0.059	
61	Figueroa Street/ Century Boulevard ^b	AM	0.771	C	0.806	D	0.814	D	0.008	0.814	D	0.008	0.891	D	0.085	0.891	D	0.085
	PM	0.717	C	0.749	C	0.738	C	-0.011	0.738	C	-0.011	0.848	D	0.099	0.848	D	0.099	
	SAT	0.711	C	0.742	C	0.768	C	0.026	0.768	C	0.026	0.966	E	0.224	0.966	E	0.224	
62	I-110 Freeway SB Off Ramp-Grand Avenue/Century Boulevard ^b	AM	0.447	A	0.465	A	0.481	A	0.016	0.481	A	0.016	0.561	A	0.096	0.561	A	0.096
	PM	0.521	A	0.543	A	0.553	A	0.010	0.553	A	0.010	0.702	C	0.159	0.702	C	0.159	
	SAT	0.532	A	0.555	A	0.583	A	0.028	0.583	A	0.028	0.769	C	0.214	0.769	C	0.214	
63	I-110 Freeway NB On Ramp-Olive Street/Century Boulevard ^b	AM	0.569	A	0.593	A	0.608	B	0.015	0.608	B	0.015	0.688	B	0.095	0.688	B	0.095
	PM	0.487	A	0.507	A	0.523	A	0.016	0.523	A	0.016	0.695	B	0.188	0.695	B	0.188	
	SAT	0.575	A	0.600	A	0.635	B	0.035	0.635	B	0.035	0.854	D	0.254	0.854	D	0.254	
64	Crenshaw Boulevard/ 104th Street ^d	AM	0.674	B	0.704	C	0.730	C	0.026	0.730	C	0.026	0.750	C	0.046	0.750	C	0.046
	PM	0.645	B	0.674	B	0.696	B	0.022	0.696	B	0.022	0.775	C	0.101	0.775	C	0.101	
	SAT	0.575	A	0.600	A	0.628	B	0.028	0.628	B	0.028	0.731	C	0.131	0.731	C	0.131	

Table IV.L-2 (Continued)

Summary of Volume to Capacity Ratios and Levels of Service - AM and PM Weekday Peak Hours and Saturday Mid Day Peak Hour

#	PEAK HOUR	YEAR 2006 EXISTING		YEAR 2014 W/ AMBIENT GROWTH		YEAR 2014 W/ PROPOSED PROJECT		CHANGE V/C	YEAR 2014 W/ PROJECT MITIGATION		CHANGE V/C	YEAR 2014 W/ RELATED PROJECTS		CHANGE V/C	YEAR 2014 W/ REGIONAL MITIGATION		CHANGE V/C	
		V/C	LOS	V/C	LOS	V/C	LOS		V/C	LOS		V/C	LOS		V/C	LOS		
65	New Signalized Project Driveway/Century Boulevard ^b	AM	f	f	f	f	0.496	A	0.496	0.496	A	0.496	0.562	A	0.562	0.562	A	0.562
	PM	f	f	f	f	0.687	B	0.687	0.687	B	0.687	0.892	D	0.892	0.892	D	0.892	
	SAT	f	f	f	f	0.691	B	0.691	0.691	B	0.691	0.980	E	0.980	0.980	E	0.980	
66	Prairie Avenue/97 th Street ^d	AM	0.371	A	0.385	A	0.432	A	0.047	0.432	A	0.047	0.453	A	0.068	0.453	A	0.068
	PM	0.487	A	0.507	A	0.528	A	0.021	0.528	A	0.021	0.608	B	0.101	0.608	B	0.101	
	SAT	0.449	A	0.467	A	0.538	A	0.071	0.538	A	0.071	0.634	B	0.167	0.634	B	0.167	

Notes:

Significant impacts are denoted with shaded cells and bold numbers.

^a City of Culver City Intersection.

^b City of Los Angeles Intersection.

^c County of Los Angeles Intersection.

^d City of Inglewood Intersection.

^e City of Hawthorne Intersection.

^f Future Intersection.

Source: Linscott, Law and Greenspan Engineers, August 1, 2008.

Existing With Ambient Growth Conditions

Weekday Existing With Ambient Growth Conditions

Growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors was assumed to be 0.65 percent (0.65%) per year through the year 2014. This growth in ambient traffic incrementally increases the v/c ratios at all of the study intersections. As shown in Table IV.L-2, 22 of the 65 existing study intersections are expected to operate at LOS E or worse during the weekday AM and/or PM peak hours with the addition of ambient growth traffic through year 2014. The remaining 43 existing study intersections are expected to continue to operate at LOS D or better during both the weekday AM and PM peak hours. The existing with ambient growth traffic volumes at the study intersections during the weekday AM and PM peak hours are displayed in Figures IV.L-13 and IV.L-14, respectively.

Saturday Existing With Ambient Growth Conditions

As shown in Table IV.L-2, five of the 65 existing study intersections are expected to operate at LOS E or worse during the Saturday mid-day peak hour with the addition of ambient growth traffic through year 2014. The remaining 60 existing study intersections are expected to continue to operate at LOS D or better during the Saturday mid-day peak hour. The existing with ambient growth traffic volumes at the study intersections during the Saturday mid-day peak hour are displayed in Figure IV.L-15.

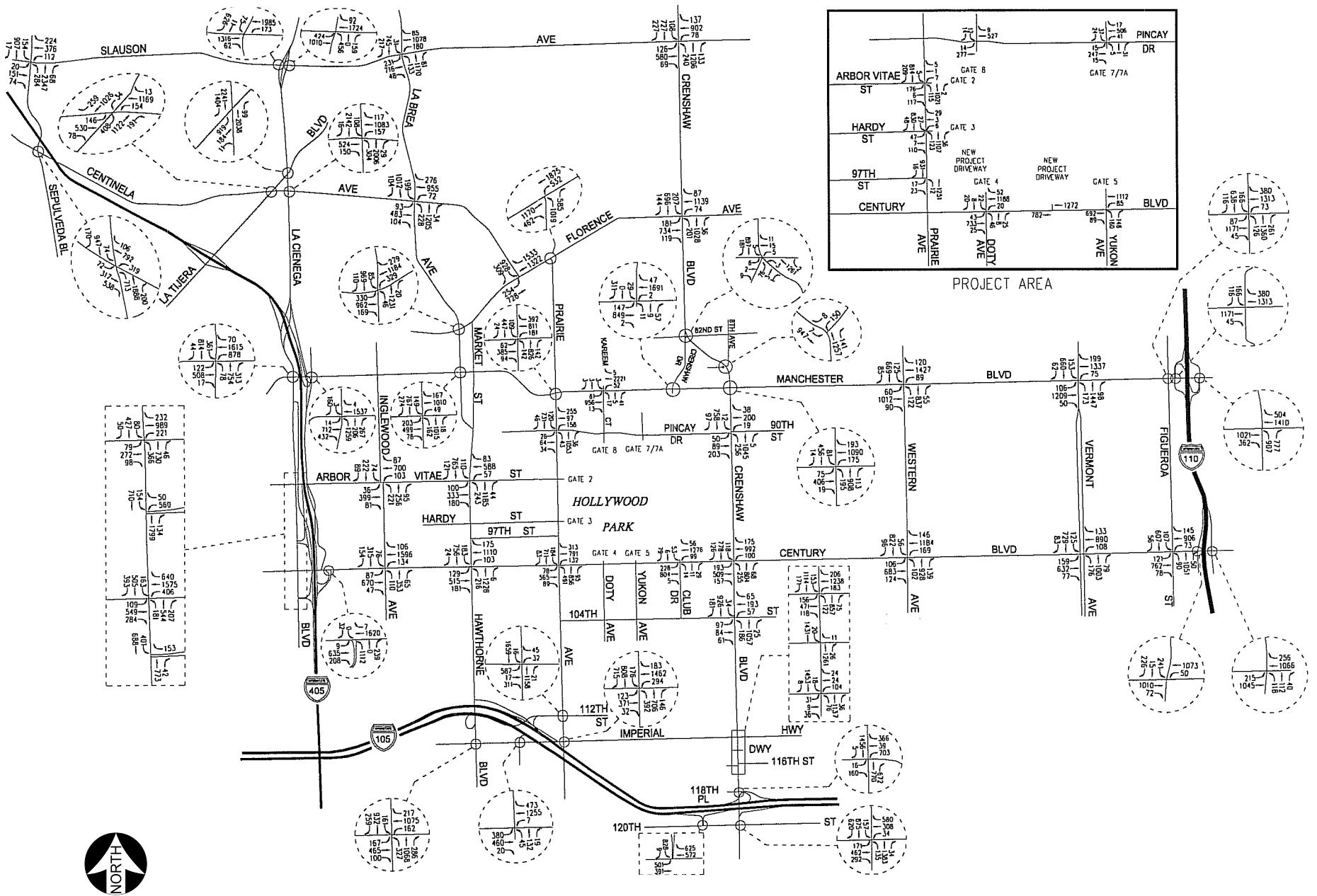
Proposed Project Site Access and Circulation

Primary vehicular access to the proposed project will be provided via the five existing signalized access points described above, plus two proposed signalized access points: one on Century Boulevard east of Gate 4/Doty Avenue and one on Prairie Avenue across from 97th Street. A brief description of the proposed project primary site access scheme and project design features to adequately serve the project site access are provided in the following paragraphs. This Traffic Impact Study assumes implementation of all of the Proposed Project's on-site and off-site roadway design features described herein as part of the project analysis conditions.

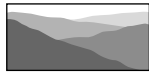
Prairie Avenue at Arbor Vitae Street:

This access point is located on the east side of Prairie Avenue, opposite Arbor Vitae Street, at the northwest corner of the project site. The roadway which will essentially function as an extension of Arbor Vitae Street will be 57 feet (curb-to-curb) in width in the vicinity of Prairie Avenue and will be constructed to City of Inglewood standards. The Arbor Vitae Street extension into the site will primarily provide vehicular access to the residential and civic use components of the project.

Project On-Site Design Features – This roadway will provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach to the Prairie Avenue/Arbor Vitae Street intersection. The existing traffic signal equipment at the Prairie Avenue/Arbor Vitae Street intersection will be

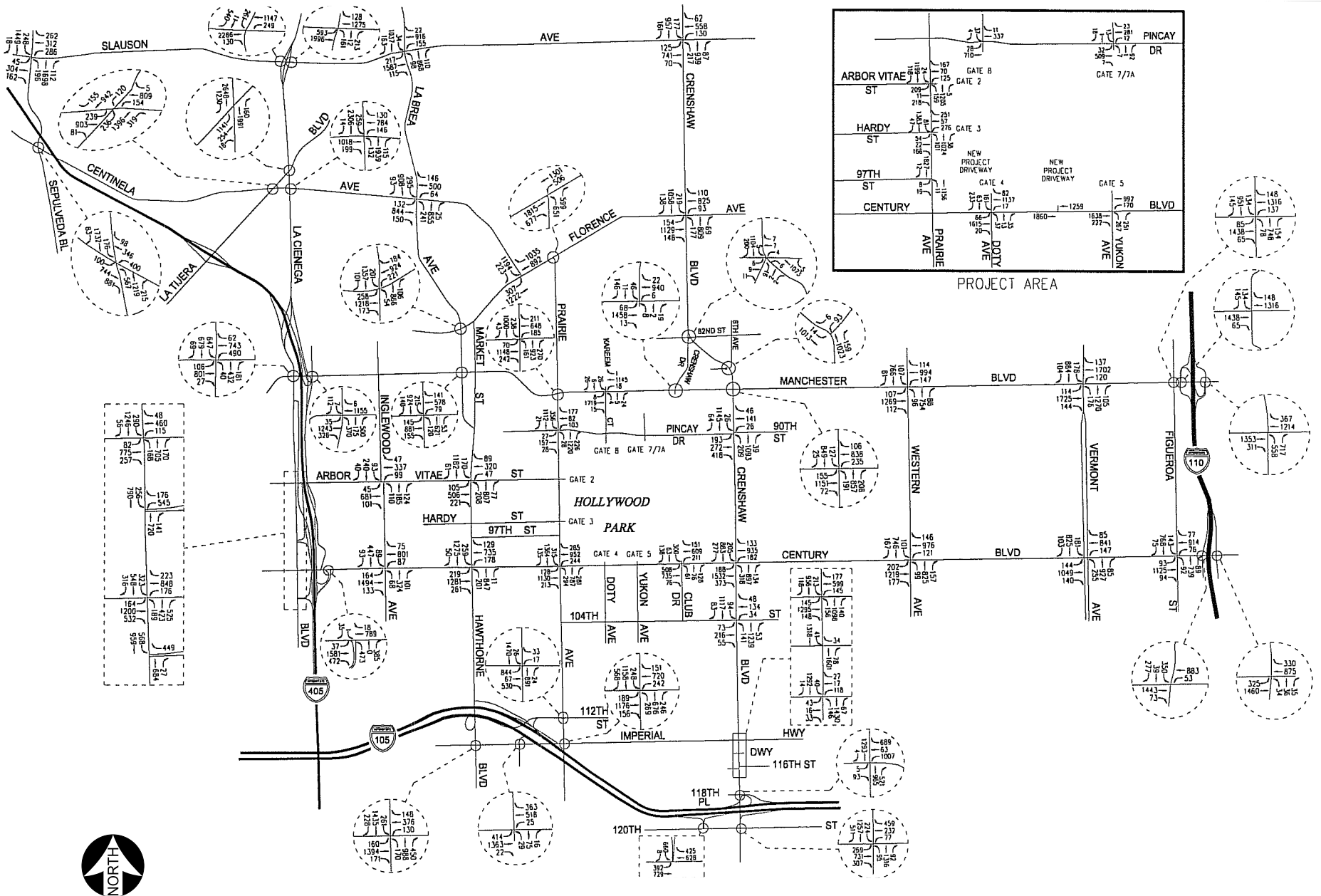


Source: Linscott, Law & Greenspan, August 1, 2008.

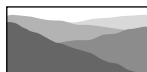


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Figure IV.L-13
Existing With Ambient Growth Traffic Volumes
Weekday AM Peak Hour

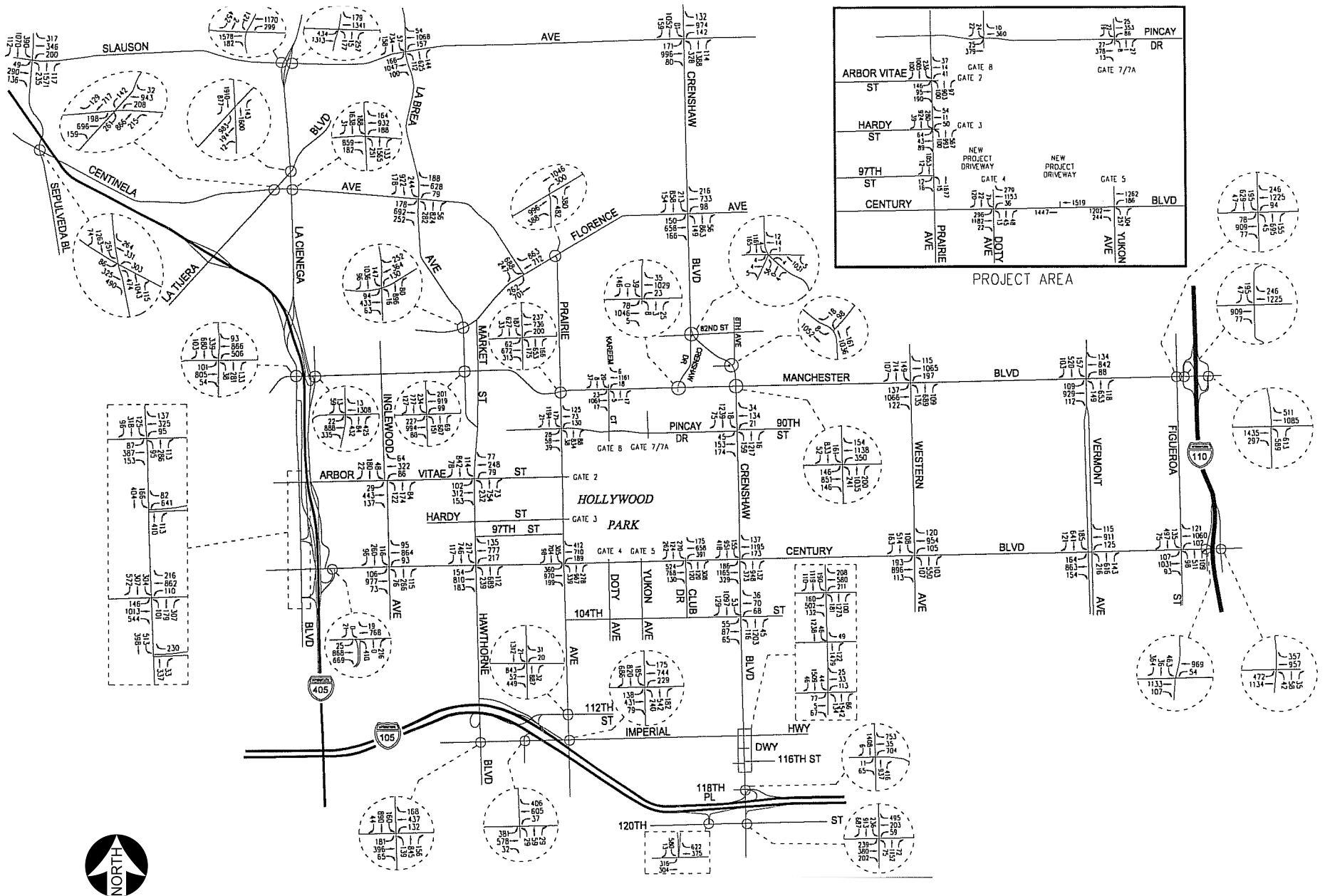


Source: Linscott, Law & Greenspan, August 1, 2008.

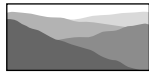


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Figure IV.L-14
Existing With Ambient Growth Traffic Volumes
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, August 1, 2008.



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

modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Prairie Avenue, the northbound approach of the Prairie Avenue/Arbor Vitae Street intersection shall be widened along the east side of Prairie Avenue to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane.

Project Off-Site Design Features – The eastbound Arbor Vitae Street approach shall be restriped within the existing pavement width to provide one left-turn lane and one shared through/right-turn lane so as to properly align with the project access road.

Prairie Avenue at Hardy Street:

This access point is located on the east side of Prairie Avenue, opposite Hardy Street. The roadway which will essentially function as an extension of Hardy Street will be 68 feet (curb-to-curb) in width in the vicinity of Prairie Avenue and will be constructed to City of Inglewood standards. The Hardy Street extension into the site will primarily provide vehicular access to the retail, civic use, and some residential components of the project.

Project On-Site Design Features – This roadway will provide one left-turn lane, one through lane, and one right-turn only lane on the westbound approach to the Prairie Avenue/Hardy Street intersection. The existing traffic signal equipment at the Prairie Avenue/Hardy Street intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Prairie Avenue, the northbound approach of the Prairie Avenue/Hardy Street intersection shall be widened along the east side of Prairie Avenue to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane.

Project Off-Site Design Features – The eastbound Hardy Street approach shall be widened and improved within the existing right-of-way along both sides of Hardy Street and restriped to provide one left-turn lane and one shared through/right-turn lane so as to properly align with the project access road.

Prairie Avenue at 97th Street:

This access point is located on the east side of Prairie Avenue, opposite 97th Street. The roadway which will essentially function as an extension of 97th Street will be 40 feet (curb-to-curb) in width in the vicinity of Prairie Avenue and will be constructed to City of Inglewood standards. The 97th Street extension into the site will primarily provide vehicular access to the retail component of the project and is proposed to be signalized.

Project On-Site Design Features – This roadway will provide one left-turn lane and one shared through/right-turn lane on the westbound approach to the Prairie Avenue/97th Street intersection. A

traffic signal shall be installed at this location to accommodate 97th Street and the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Prairie Avenue, the northbound approach of the Prairie Avenue/97th Street intersection shall be widened along the east side of Prairie Avenue to provide an exclusive right-turn lane. The resultant lane configurations on the northbound Prairie Avenue approach will be one left-turn lane, three through lanes, and one right-turn only lane.

Project Off-Site Design Features – The eastbound 97th Street approach shall be widened and improved within the existing right-of-way along and restriped to provide one left-turn lane and one shared through/right-turn lane so as to properly align with the project access road.

Century Boulevard at Doty Avenue:

This access point is located on the north side of Century Boulevard, opposite Doty Avenue. The roadway which will essentially function as an extension of Doty Avenue will be 68 feet (curb-to-curb) in width in the vicinity of Century Boulevard and will be constructed to City of Inglewood standards. The Doty Avenue extension into the site will primarily provide vehicular access to the retail component of the project. Some traffic associated with the casino component of the project will also utilize this driveway.

Project On-Site Design Features – This roadway will provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach to the Doty Avenue/Century Boulevard intersection. The existing traffic signal equipment at the Doty Avenue/Century Boulevard intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Century Boulevard, the westbound approach of the Doty Avenue/Century Boulevard intersection shall be widened along the north side of Century Boulevard to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane.

Project Off-Site Design Features – The northbound Doty Avenue approach shall be restriped within the existing pavement width to provide one left-turn lane and one shared through/right-turn lane so as to properly align with the project access road.

Century Boulevard at Proposed Signalized Driveway (east of Doty Avenue):

This access point is located on the north side of Century Boulevard, approximately 600 feet east of Doty Avenue. The roadway is proposed to be a private roadway and will be 57 feet (curb-to-curb) in width. The proposed signalized driveway will primarily provide vehicular access to the casino component of the project.

Project On-Site Design Features – This roadway will provide one left-turn lane and one right-turn only lane on the southbound approach to the Century Boulevard intersection. A traffic signal shall be installed at this location to accommodate the project access road and will serve all vehicular and pedestrian

movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Century Boulevard, the westbound approach of this intersection shall be widened along the north side of Century Boulevard to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be three through lanes and one right-turn only lane.

Century Boulevard at Yukon Avenue:

This access point is located on the north side of Century Boulevard, opposite Yukon Avenue. The roadway which will essentially function as an extension of Yukon Avenue will be 60 feet (curb-to-curb) in width and will be constructed to City of Inglewood standards. The Yukon Avenue extension into the site will primarily provide vehicular access to the hotel and residential components of the project. Some traffic associated with the retail component of the project is also anticipated to utilize this driveway.

Project On-Site Design Features – This roadway will provide one left-turn lane, one through lane, and one right-turn only lane on the southbound approach to the Yukon Avenue/Century Boulevard intersection. The existing traffic signal equipment at the Yukon Avenue/Century Boulevard intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection. In addition, to provide additional vehicular capacity and to facilitate traffic flow along Century Boulevard, the westbound approach of the Yukon Avenue/Century Boulevard intersection shall be widened along the north side of Century Boulevard to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane.

Project Off-Site Design Features - The northbound Yukon Avenue approach shall be restriped within the existing pavement width to provide one left-turn lane, one through lane, and one shared through/right-turn lane so as to properly align with the project access road.

Pincay Drive at Carlton Drive:

This access point is located on the south side of Pincay Drive, opposite Carlton Drive. The roadway which will essentially function as an extension of Carlton Drive will be 26 feet (curb-to-curb) in width due to existing right-of-way/easement constraints. The Carlton Drive extension into the site will primarily provide vehicular access to the residential component of the project.

Project Off-Site Design Features – This roadway will provide one shared left-turn/through/right-turn lane on the northbound approach to the Carlton Drive/Pincay Drive intersection. The existing traffic signal equipment at the Carlton Drive/Pincay Drive intersection will be modified to accommodate the project access road and will serve all vehicular and pedestrian movements at the intersection.

Private Secondary Driveways (along Century Boulevard and Prairie Avenue)

In addition to the primary access points described above, secondary driveways would be provided to facilitate project traffic access to and from the project site. A minimum of one driveway but no more than

three driveways should be provided at each of the following locations as part of the proposed project:

- North side of Century Boulevard east of Yukon Avenue (to serve the retail use)
- North side of Century Boulevard between the proposed signalized driveway and Yukon Avenue (to serve the hotel and retail uses)
- North side of Century Boulevard between Prairie Avenue and Doty Avenue (to serve the retail use)
- East side of Prairie Avenue between 97th Street and Century Boulevard (to serve the retail use)
- East side of Prairie Avenue between Arbor Vitae Street and Hardy Street (to serve the residential use)

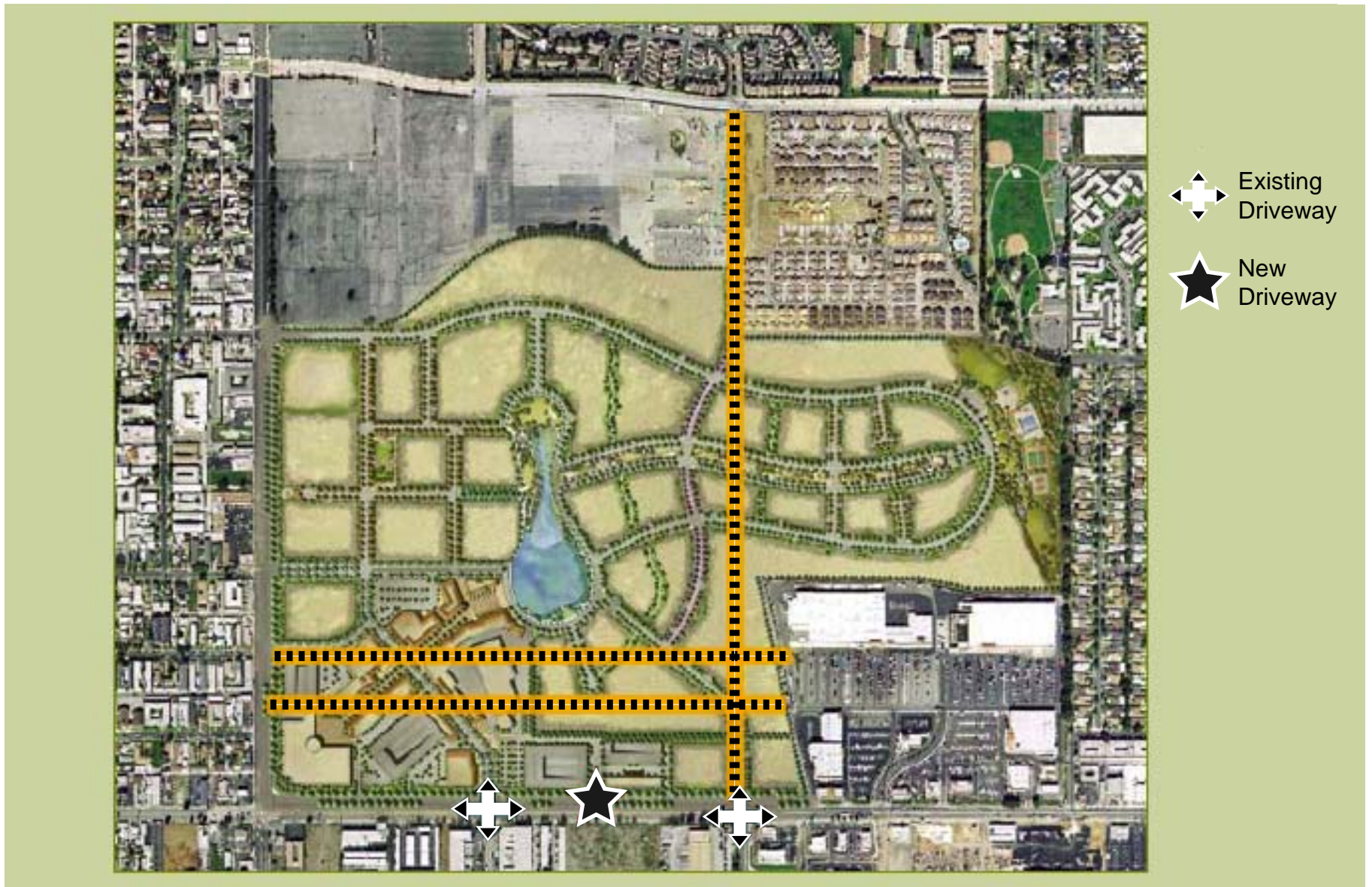
It should be noted that all of the proposed secondary access driveways are anticipated to be limited to right-turn ingress and egress turning movement only operations. Further, the Traffic Impact Study assumes a minimum of one secondary access driveway is provided at each of the above locations, however, providing two or three driveways at these locations will not change the overall results of this study. It is further noted that minor driveways may also be provided along Prairie Avenue and Century Boulevard in addition to the primary and secondary driveways to accommodate service vehicles.

Internal Circulation

The Proposed Project is designed as a “smart growth” mixed-use infill development, designed to concentrate neighborhoods by bringing daily activities within walking distance of each other in an effort to reduce reliance on the private automobile, thereby reducing VMT. The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. The Project Site would contain a network of streets and paseos that connect the parks and plazas with retail, entertainment, residential, office and civic uses.

Alternative internal circulation plans were considered for the Proposed Project, including providing cut-through streets across the Project Site as depicted in Figures IV.L-16 and IV.L-17.

An internal circulation plan which included cut-through streets across the Project Site was determined to be unsuitable for the Project Site for several reasons. First, creating cut-through streets across the Project Site detracts from the walkability of the development and could lead to safety concerns resulting from pedestrians walking in the retail/entertainment area of the Project Site and vehicles cutting across the Project Site to quickly access areas adjacent to the Project Site. Also, the cut-through streets would not connect to the broader arterial street system, as shown in Figure IV.L-17. As a result, cut-through traffic could be released onto existing residential neighborhood streets upon exiting the Project Site.

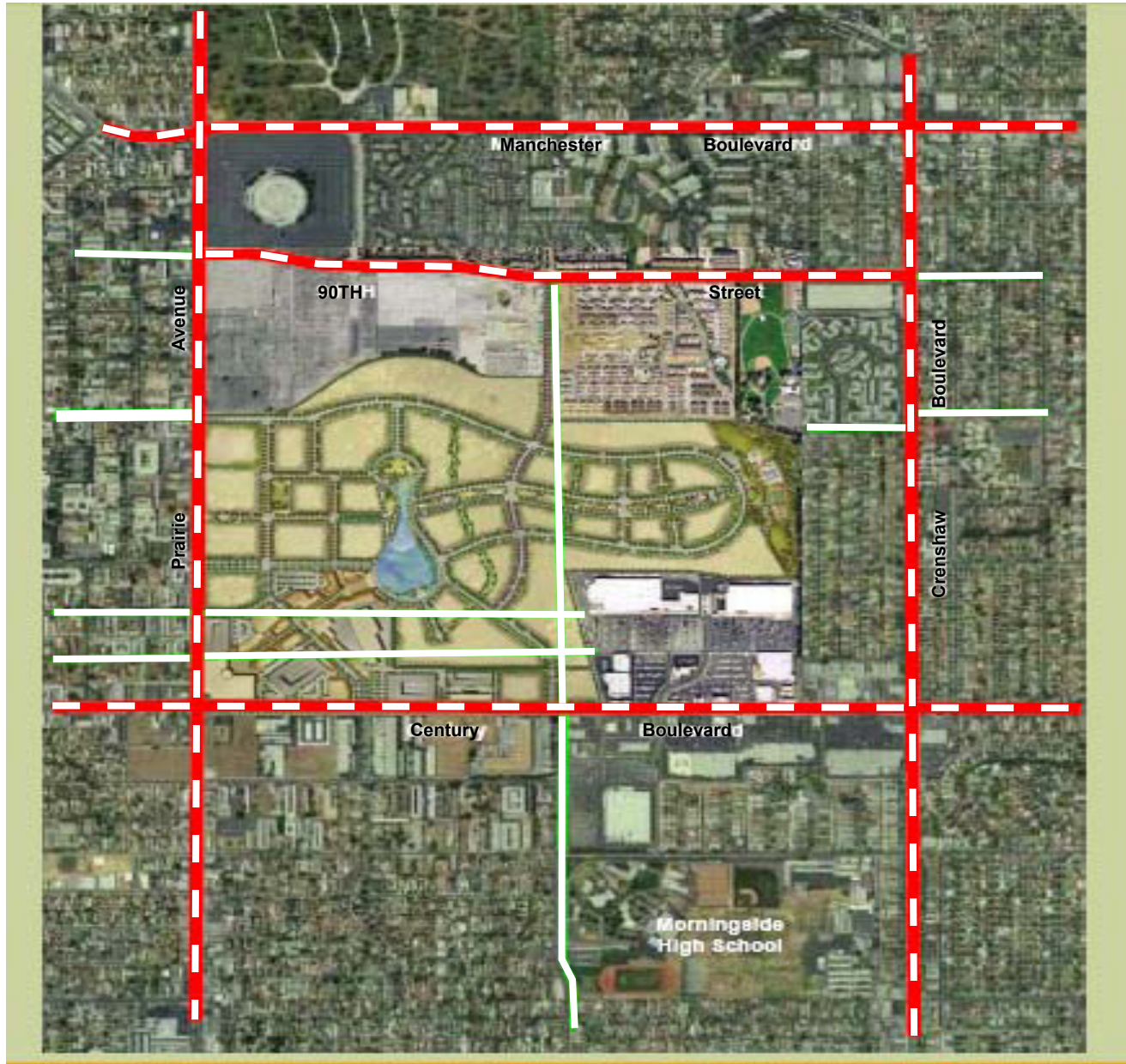


Source: Hollywood Park Land Company, August 2008.



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



Source: Hollywood Park Land Company, August 2008.



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

This could result in unanticipated secondary traffic impacts to neighboring residential streets. Given this, providing funding for ITS improvements (as provided in the Mitigation Measures in this Section) to improve the flow of traffic was determined to be a better alternative than creating cut-through streets across the Project Site. ITS synchronization could provide an improvement over baseline traffic conditions since it would help eliminate bottle necks and queues and would allow for a more efficient flow of traffic around the Project Site and through the City.

Moreover, as shown in Figure IV.L-18, within the Project Site, the design of the Proposed Project's internal circulation plan allows the internal streets to operate at LOS A. Therefore, the internal circulation plan for the Project Site would result in a less than significant impact to traffic and circulation.

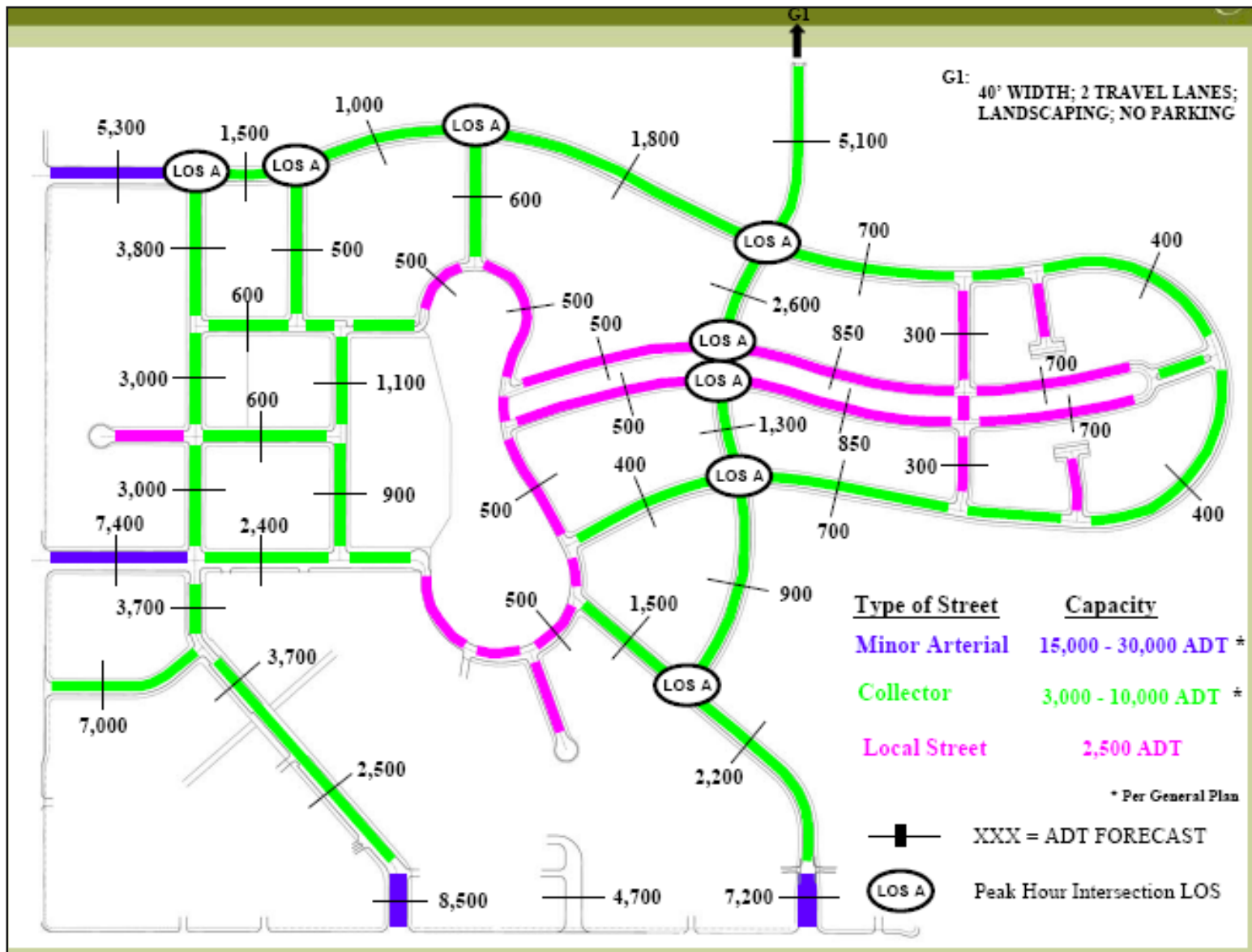
Additional On-Site Project Design Feature:

A voluntary improvement/project on-site design feature to provide additional vehicular capacity and to facilitate traffic flow at the key intersection of Prairie Avenue and Century Boulevard adjacent to the project is also proposed. The westbound approach of the Prairie Avenue/Century Boulevard intersection shall be widened along the north side of Century Boulevard to provide an exclusive right-turn lane. The traffic signal shall be modified to provide a westbound right-turn overlapping phase to be operated concurrently with the southbound left-turn phase. The recommended improvement will benefit existing and future traffic flow at this location by providing an exclusive right-turn only lane and an exclusive right-turn signal phase at the intersection. The resultant lane configurations on the westbound approach will be one left-turn lane, three through lanes, and one right-turn only lane.

Transportation Demand Management Strategy

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

- (1) A kiosk or bulletin board providing information about ride sharing and public transportation;
- (2) Bicycle racks at a ratio of one (1) bicycle space for every 50,000 square feet of non-residential development plus an additional three (3) bicycle spaces (developments under 50,000 square feet are exempt from this requirement);
- (3) Employee parking area and safe and convenient access from the employee parking area to all businesses;



Source: Hollywood Park Land Company, August 2008.



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

- (4) Bus shelter improvements along Century Boulevard and Prairie Avenue adjacent to the project;
- (5) Preferential parking spaces for vanpools;
- (6) Sidewalks or other designated pathways following safe routes from the pedestrian circulation along Century Boulevard and Prairie Avenue to the bicycle parking facilities and into the development; and
- (7) Transportation/Parking Benefit Account (similar to flexible spending accounts) used by on-site employers to provide their employees the opportunity to benefit from tax advantages under the Internal Revenue Code for qualified parking, vanpooling and purchasing of transit passes.

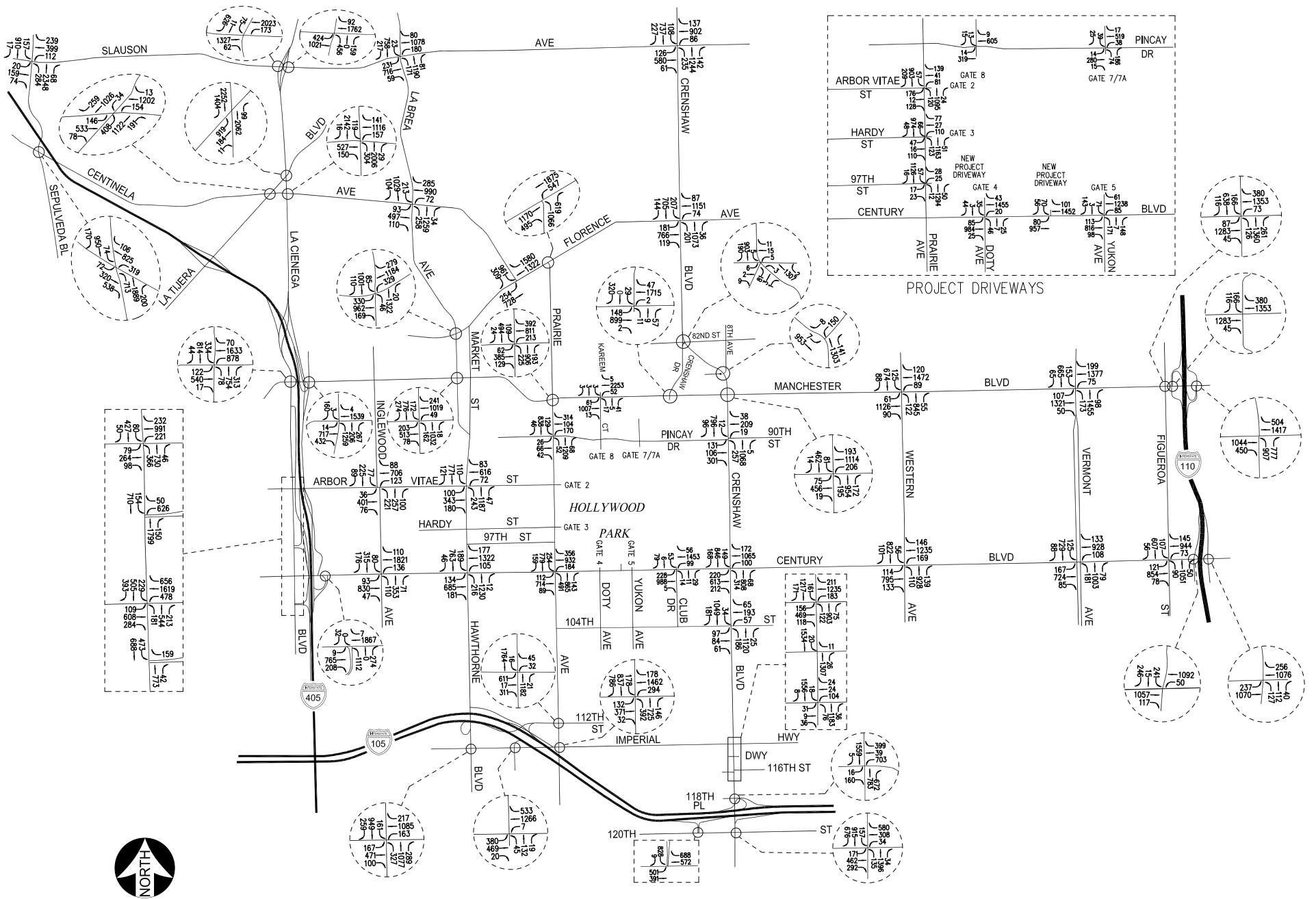
Future With Proposed Project Conditions

Weekday Future With Proposed Project Conditions

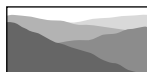
As shown in Table IV.L-2, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the proposed project is expected to create a significant impact at ~~five-six~~ of the study intersections during the AM and/or PM peak hours. Incremental but not significant impacts are noted at the remaining 61 study intersections during the weekday AM and PM peak hours. The five study intersections that are identified to be significantly impacted by the project during the weekday AM and/or the PM peak hours are as follows:

- Intersection No. 18: La Brea Avenue/Centinel Avenue
- Intersection No. 19: La Brea Avenue/Florence Avenue
- Intersection No. 22: La Brea Avenue/Century Boulevard
- Intersection No. 25: Prairie Avenue/Florence Avenue
- Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard
- Intersection No. 47: Crenshaw Boulevard/Century Boulevard

The future with project (existing, ambient growth and project) traffic volumes at the study intersections for the weekday AM and PM peak hours are displayed in Figures IV.L-19 and IV.L-20, respectively.

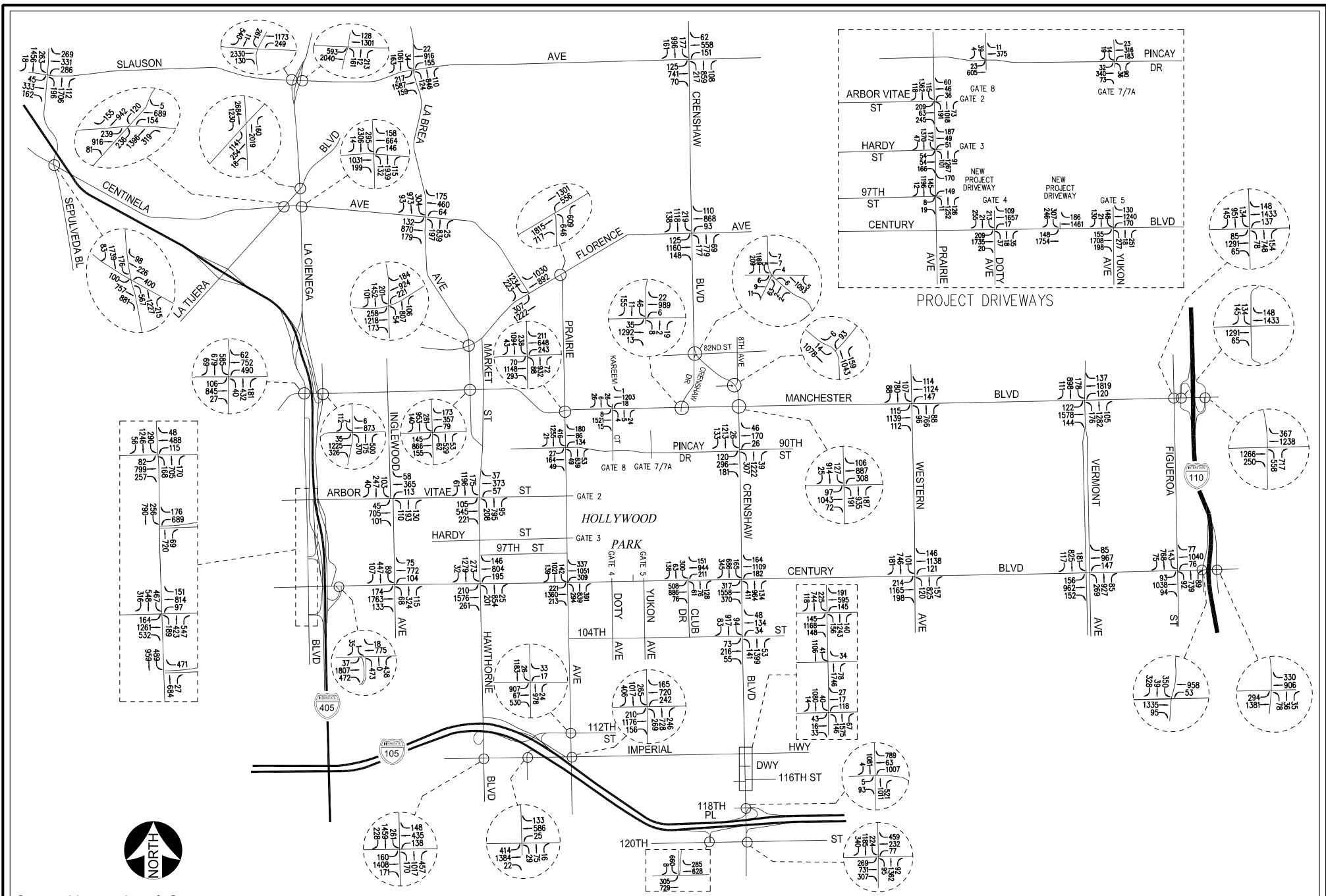


Source: Linscott, Law & Greenspan, 02/16/2009.

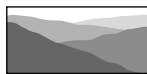


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Figure IV.L-19 [REVISED]
Future with Project Traffic Volumes
Weekday AM Peak Hour



Source: Linscott, Law & Greenspan, 02/16/2009.



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Figure IV.L-20 [REVISED]
Future with Project Traffic Volumes
Weekday PM Peak Hour

Saturday Future With Proposed Project Conditions

As shown in Table IV.L-2, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the proposed project is expected to create a significant impact at two of the study intersections during the Saturday mid-day peak hour. As indicated in Table IV.L-2, incremental but not significant impacts are noted at the remaining 64 study intersections during the Saturday mid-day peak hour. The two study intersections that are identified to be significantly impacted by the project during the Saturday mid-day peak hour are as follows:

- Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard;
- Intersection No. 47: Crenshaw Boulevard/Century Boulevard

The future with project (existing, ambient growth and project) traffic volumes at the study intersections for the Saturday mid-day peak hour are displayed in Figure IV.L-21.

Congestion Management Program Traffic Impact Assessment

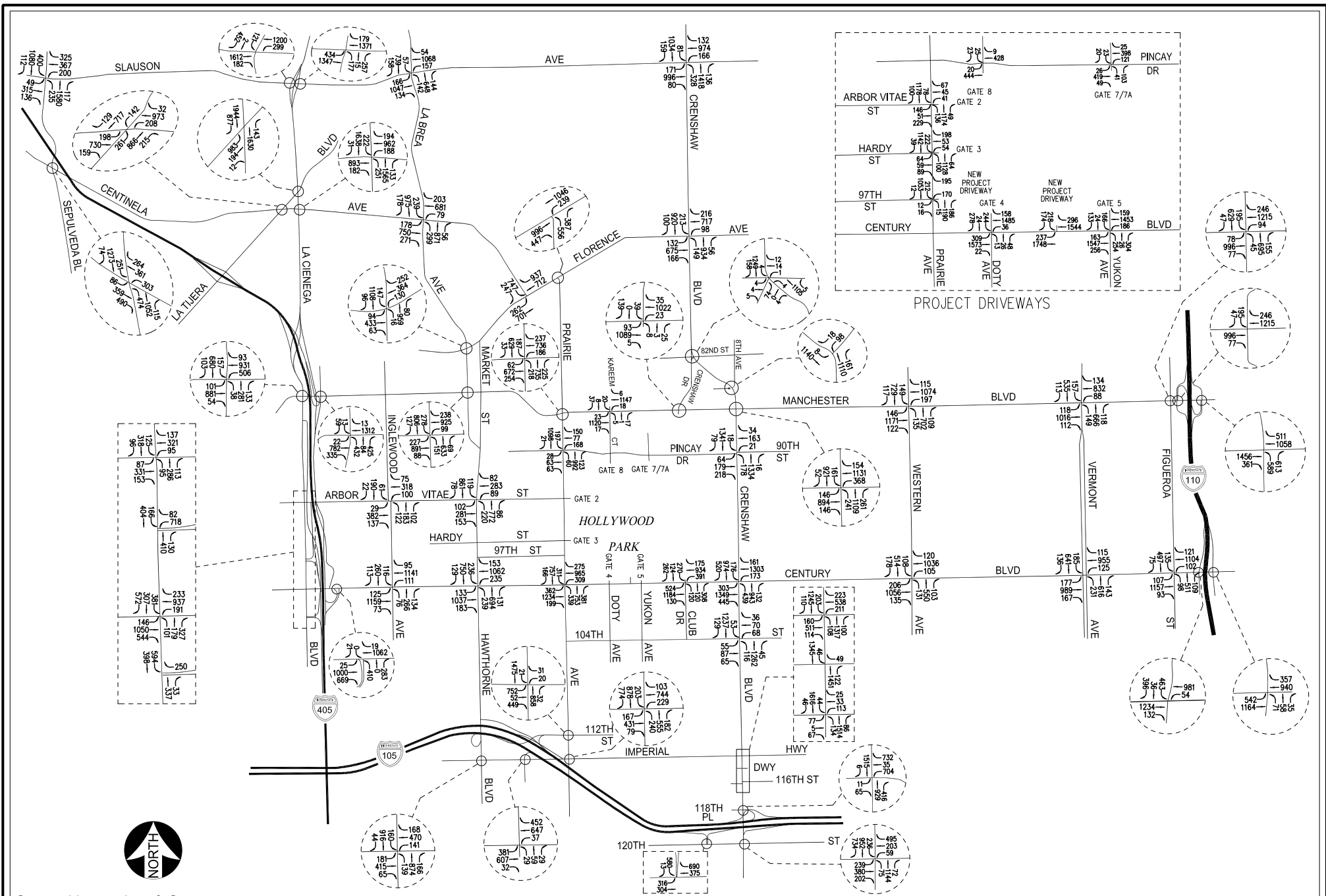
The Congestion Management Program (CMP) is a state-mandated program that was enacted by the State Legislature with the passage of Proposition 111 in 1990. The program is intended to address the impact of local growth on the regional transportation system.

As required by the 2004 Congestion Management Program for Los Angeles County, a Traffic Impact Assessment (TIA) has been prepared to determine the potential impacts on designated monitoring locations on the CMP highway system. The analysis has been prepared in accordance with procedures outlined in the 2004 Congestion Management Program for Los Angeles County, County of Los Angeles Metropolitan Transportation Authority, July, 2004.

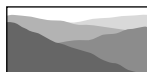
According to Section B.9.1 of the 2004 CMP manual, the criteria for determining a significant impact is as follows:

"A significant transportation impact occurs when the proposed project increases traffic demand by 2% of capacity ($V/C \geq 0.02$), causing or worsening LOS F ($V/C > 1.00$)."

The CMP impact criteria apply for analysis of both intersection and freeway monitoring locations.



Source: Linscott, Law & Greenspan, 02/16/2009.



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Figure IV.L-21 [REVISED]
Future with Project Traffic Volumes
Saturday Mid-Day Peak Hour

Intersections

The following CMP intersection monitoring locations in the project vicinity have been identified:

<u>CMP Station</u>	<u>Intersection</u>
CMP Int. No. 24	Crenshaw Boulevard/Manchester Boulevard
CMP Int. No. 25	La Brea Avenue/Manchester Boulevard
CMP Int. No. 47	La Cienega Boulevard/Centinela Avenue
CMP Int. No. 53	Vermont Avenue/Manchester Avenue

The CMP TIA guidelines require that intersection monitoring locations must be examined if the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic) at CMP monitoring intersections, as stated in the CMP manual as the threshold criterion for a traffic impact assessment. The CMP intersection traffic impact assessment is summarized in Table IV.L-3. As shown, the proposed Hollywood Park Redevelopment Project will add 50 or more trips at the identified CMP intersections during the AM weekday peak hour. A review of potential impacts at the four CMP monitoring stations has been prepared.

**Table IV.L-3
Congestion Management Plan Intersection Traffic Impact Assessment**

No.	Location	Peak Hour	Forecast Net New Project Trips	CMP Impact Assessment Threshold	Meets CMP Threshold for Impact Assessment?^a
45	Crenshaw Boulevard/Manchester Avenue (CMP Monitoring Station No. 24)	AM	216	50	YES
		PM	2278	50	NO YES
20	La Brea Avenue/Manchester Boulevard (CMP Monitoring Station No. 25)	AM	146	50	YES
		PM	-332259	50	NO
7	La Cienega Boulevard/Centinela Avenue (CMP Monitoring Station No. 47)	AM	71	50	YES
		PM	-6543	50	NO
56	Vermont Avenue/Manchester Avenue (CMP Monitoring Station No. 53)	AM	169	50	YES
		PM	-3511	50	NO

^a A "yes" response indicates that the traffic volumes at the CMP location warrant a detailed assessment. It does not indicate that the volumes would result in a significant CMP Impact.

Based on procedures outlined in the "2004 Congestion Management Program for Los Angeles County," County of Los Angeles Metropolitan Transportation Authority, July 2004.

Source: Linscott, Law and Greenspan, Revised Traffic Impact Study, August 1, 2008.

The review of potential impacts at the four CMP monitoring stations is based on the overall analysis prepared for the proposed project, since the City of Inglewood traffic impact criteria is consistent with the CMP. Based on the traffic impact analysis summarized in Table IV.L-2, CMP Station 24: Crenshaw Boulevard/Manchester Boulevard (also referred to as study intersection No. 45) is expected to be impacted by the proposed project. The other three intersections that trigger the threshold for analysis will not be significantly impacted by the Proposed Project. Funding the installation of ITS traffic signal program has been proposed as the mitigation measure for the impacted intersection. As shown in Table

IV.L-2, the mitigation measure is expected to reduce the projected impacts to less than significant levels at this CMP monitoring station.

Freeways

The following CMP freeway monitoring locations in the project vicinity have been identified:

<u>CMP Station</u>	<u>Location</u>
1042	I-105 Freeway e/o Crenshaw Boulevard, w/o Vermont Avenue
1046	I-110 Freeway at Manchester Avenue
1069	I-405 Freeway n/o La Tijera Boulevard

The CMP TIA guidelines require that freeway monitoring locations must be examined if the proposed project will add 150 or more trips (in either direction) during either the weekday AM or PM peak hours. The CMP freeway traffic impact assessment is summarized in Table IV.L-4.

**Table IV.L-4
Congestion Management Plan Freeway Traffic Impact Assessment**

CMP Station	Location	Peak Hour	Direction	Forecast Net New Project Trips	CMP Impact Assessment Threshold	Meets CMP Threshold for Impact Assessment?^a
1042	I-105 Freeway east of Crenshaw Boulevard, west of Vermont (R 5.50)	AM	EB	123	150	NO
			WB	43	150	NO
		PM	EB	562 458	150	NO
			WB	449 127	150	NO
1046	I-110 Freeway at Manchester Avenue (PM 15.86)	AM	NB	117	150	NO
			SB	20	150	NO
		PM	NB	35 55	150	NO
			SB	49 51	150	NO
1069	I-405 Freeway n/o La Tijera Boulevard (PM 24.27)	AM	NB	94	150	NO
			SB	42	150	NO
		PM	NB	170 128	150	NO
			SB	96 2	150	NO

^a A "yes" response indicates that the traffic volumes at the CMP location warrant a detailed assessment. It does not indicate that the volumes would result in a significant CMP Impact.

Based on procedures outlined in the "2004 Congestion Management Program for Los Angeles County," County of Los Angeles Metropolitan Transportation Authority, July 2004.

Source: Linscott, Law and Greenspan, Revised Traffic Impact Study, August 1, 2008.

As shown in Table IV.L-4, the proposed Hollywood Park Redevelopment Project will not add 150 or more trips (in either direction) during either the weekday AM or PM peak hours to the CMP freeway monitoring locations which is the threshold for preparing a traffic impact analysis, as stated in the CMP manual. Therefore, no further review of potential impacts to freeway monitoring locations which are part of the CMP highway system is required.

Transit

As required by the 2004 Congestion Management Program for Los Angeles County, a review has been made of the CMP transit service. As previously discussed, existing transit service is provided in the vicinity of the proposed project.

The weekday project trip generation was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the proposed project is forecast to generate demand for 79 new transit trips (29 inbound trips and 50 outbound trips) during the weekday AM peak hour. During the PM peak hour, the proposed project is forecast to generate demand for ~~nominal 21~~ new transit trips (~~due to transit usage associated with the existing uses which will be removed~~). Over a 24-hour period, the proposed project is forecast to generate a demand for ~~844~~ 956 new daily transit trips. The calculations are as follows:

- AM Peak Hour Trips = $1,604 \times 1.4 \times 0.035 = 79$ Transit Trips
- PM Peak Hour Trips = $419 \times 1.4 \times 0.035 = 21$ Transit Trips
- Daily Trips = ~~47,222~~ 19,512 $\times 1.4 \times 0.035 = 844 956 Transit Trips$

It is anticipated that the existing transit service in the project area will adequately accommodate the project generated transit trips. The Project Site vicinity is currently served by approximately 70 buses per hour during the AM peak hour. Thus, the project will generate on average one to two new boardings/alightings per bus in the AM peak hour. Therefore, given the number of transit trips generated by the project, the relatively high number of existing transit routes in the project vicinity, and the available transit ridership data, it is concluded that the public transit system will not be significantly impacted by the proposed project.

Construction Impacts

Construction Assumptions

It is assumed that the Hollywood Park Project Site will have demolition and grading during the first year of construction. It is also assumed that after completion of the initial phase of construction, demolition and grading, final grading and structure construction would begin on the on the site and extend over a five-year period. It is estimated that the demolition would require the removal of approximately 200,000 tons of material from the site. Grading would be balanced on-site, thus the need to haul additional fill material to the site or to haul excess material off site would not be required. It is assumed that the equipment staging area and construction worker parking during the initial phases of construction grading, as well as after the start of construction would occur on the Project Site.

Construction Traffic Trip Generation – Construction Grading and Material Export

It is assumed that heavy construction equipment would be located on-site during grading activities and would not travel to and from the Project Site on a daily basis. However, truck trips would be generated by the Project Site during the demolition, grading, and export period, so as to remove material (from demolition) from the site. Trucks are expected to carry the export material to a receiver site located within 25 to 30 miles of the Project Site. The project applicant anticipates that trucks with a capacity to carry at least 20 tons of material per truck will be used during the export period. The export period is assumed to require approximately 22 workdays per month for six months. During the peak demolition, grading and export activities, up to 50 truck trips per day (i.e., 25 inbound and 25 outbound trips) are anticipated. Of the 50 daily truck trips, it is estimated that approximately eight truck trips (four inbound and four outbound trips) would occur during the weekday a.m. peak hour, the weekday p.m. peak hour, and the Saturday mid-day peak hour.

Construction Traffic Trip Generation – Final Grading and Structure Construction

Activities related to final grading/structure construction period would generate a higher number of vehicle trips as compared to the grading and export period. Thus, the greatest potential for construction impact on the adjacent street system would occur during the final grading/structure construction period.

During the final grading and structure construction period, a trip generation rate of 0.36 worker vehicle trips per unit of residential development per day and 0.32 worker vehicle trips per 1,000 square feet of commercial development per day is assumed. Construction workers are expected to typically arrive at the Project Site before 7:00 a.m. and most depart before 3:00 p.m. Thus, these construction work trips would occur outside of the peak hour of traffic on the local street system. For example, as shown in the traffic study, the peak hour of traffic at the study intersections adjacent to the Project Site begins between 7:15 and 7:30 a.m. during the morning commuter period, and begins at 5:00 p.m. during the afternoon commuter period.

It is anticipated that construction workers would remain on-site throughout the day. For the residential component of the project, it is estimated that approximately 180 vehicle trips per day (i.e., 90 inbound and 90 outbound trips) would be generated by the construction workers during the peak construction phases at the site (i.e., up to 500 units constructed per construction phase). In addition, it is estimated that approximately 200 vehicle trips per day (i.e., 100 inbound and 100 outbound trips) would be generated by construction workers for the 620,000 square feet retail component, assumed to be constructed simultaneously with the residential component. Of the peak daily trip generation of 380 daily trips, it is estimated that approximately 19 construction worker vehicle trips (10 percent of the daily construction worker inbound or outbound trips) would occur during the weekday a.m. peak hour, the weekday p.m. peak hour and the Saturday mid-day peak hour.

In addition to construction worker vehicles, additional trips may be generated by miscellaneous trucks traveling to and from the Project Site. These trucks may consist of larger vehicles delivering equipment and/or construction materials to the Project Site, or smaller pick up trucks or four wheel drive vehicles

used by construction supervisors and/or City inspectors. During peak construction phases, it is estimated that approximately 40 trips per day would be made by miscellaneous trucks. To conservatively estimate the equivalent number of vehicles associated with the trucks, a passenger car equivalency (PCE) factor of 2.0 was utilized based on standard traffic engineering practice. Therefore, conservatively assuming 40 daily truck trips, it is estimated that approximately 12 PCE vehicle trips (six inbound and six outbound trips) would occur during the weekday a.m. peak hour, the weekday p.m. peak hour, and the Saturday mid-day peak hour.

The traffic generation forecast for the project during peak construction activities is summarized in Table IV.L-5. As shown in Table IV.L-5, the construction worker vehicles and miscellaneous trucks are forecast to generate 460 PCE vehicle trips per day (i.e., 230 inbound and 230 outbound) during peak final grading and structure construction phases at the site. During the weekday a.m. peak hour, the weekday p.m. peak hour, and the Saturday mid-day peak hour, it is estimated that approximately 31 PCE vehicle trips would be generated during each of these peak hours.

**Table IV.L-5
Project Trip Generation During Peak Construction Activities**

	Daily Trip Ends Volumes	Weekday AM Peak Hour Volumes			Weekday P.M. Peak Hour Volumes			Sat Mid Day Peak Hour Volumes		
		In	Out	Total	In	Out	Total	In	Out	Total
Construction Workers ^a	380	19	nom.	19	nom.	19	19	nom.	19	19
Construction Trucks PCE Factor ^b										
Construction Vehicles (PCE)	80	6	6	12	6	6	12	6	6	12
TOAT NET TRIPS	460	25	6	31	6	25	31	6	25	31

Notes:
^a It is assumed that a trip generation rate of 0.36 worker vehicle trips per unit of residential development per day is used for up to 500 residential units constructed per construction phase (500 units x 0.36 worker per unit per day = 180 daily trips). In addition, it is assumed that a trip generation rate of 0.32 worker vehicle trips per 1,000 square feet of commercial development per day is used for the commercial component (620,000 square feet x 0.32 worker per 1,000 square feet per day = 200 trips). For purposes of this analysis, ten percent of daily construction worker inbound or outbound trips would occur during each of the analysis peak hours.
^b It is estimated that approximately 40 trips per day would be made by miscellaneous trucks and 15% of the daily truck trips would occur during each of the analysis peak hours. A passenger car equivalency (PCE) factor of 2.0 was used to estimate the equivalent number of vehicles associated with trucks.
Source: Linscott Law and Greenspan, Engineers, August 1, 2008.

Construction Traffic Impact Review

It is estimated that the construction work force would likely be generated from all parts of the Los Angeles region and thereby is assumed to arrive and depart from all directions (e.g., each direction along the I-405, I-105 and I-110 Freeways and from the local areas). Based on the peak construction project trip generation forecasts, traffic impacts due to construction activities are forecast to be less than significant based on the City's significance criteria.

Project Phasing Analysis

The proposed project is planned to be constructed in three general phases, with build-out of the overall project anticipated by year 2014. The removal of the existing Hollywood Park racetrack is anticipated to be completed prior to construction of the first development phase. The following provides a general overview of the project phasing:

- Phase I: The first phase of development includes the construction of the retail, hotel and office components of the proposed project. (While the hotel was included in the Phase I analysis to study the maximum impacts for traffic, it is anticipated that the hotel would be developed in a later phase, depending on market conditions.) In addition, the first 1,000 residential dwelling units will be constructed under Phase I. As discussed previously, the casino/off-track betting component of the project will remain at its current location. Primary vehicular access for this phase will be provided via the Hardy Street, 97th Street, Doty Avenue, and Yukon Avenue access driveways. In addition, the proposed signalized driveway on Century Boulevard east of Doty Avenue will also be constructed to serve the casino/off-track betting component.
- Phase II: The second phase of development includes the construction of the civic use component and the next 1,000 residential dwelling units of the proposed project. In addition to the vehicular access driveways provided under Phase I development, the Arbor Vitae Street access driveway will be constructed under Phase II to provide vehicular access to the civic use and residential components of the project.
- Phase III: The final phase of development includes the construction of the remaining 995 residential dwelling units for the proposed project. In addition to the vehicular access driveways provided under Phase I and Phase II development, the Pincay Drive access opposite Carlton Drive will be constructed under Phase III to provide vehicular access to the residential component of the project.

The following sections summarize the results of additional traffic analyses prepared to identify the project mitigation measures required under each development phase. This evaluation involved the preparation of phased trip generation forecasts and supplemental intersection Level of Service analyses. It should be noted that the phased traffic impact analysis focused solely on the six study intersections that were forecast to be significantly impacted by the overall build-out of the proposed project.

Project Phase I Analysis

The weekday trip generation forecast for Phase I project development is summarized in the Project Traffic Study. As shown, Phase I project development is expected to generate an additional 852 vehicle trips (401 more inbound trips and 451 more outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, Phase I project development is expected to generate 874 fewer vehicle trips (759 more inbound trips and 1,633 fewer outbound trips). Over a 24-hour period, Phase I project

development is forecast to generate an additional 8,086 daily trip ends during a typical weekday (4,043 inbound trips and 4,043 outbound trips).

The weekend trip generation forecast for Phase I project development is summarized in the Project Traffic Study (see Appendix G-1 to this Draft EIR). As shown, Phase I project development is expected to generate an additional 675 vehicle trips (272 fewer inbound trips and 947 more outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, Phase I project development is forecast to generate an additional 17,420 daily trip ends during a typical weekend day (8,710 inbound trips and 8,710 outbound trips).

In order to determine the operating conditions of the six study intersections with the Phase I project development, traffic associated with Phase I project development was assigned to the local roadway system based on the trip distribution and assignment characteristics consistent with the proposed project and the Phase I site access scheme. As shown in the Project Traffic Study (see Appendix G-1 to this Draft EIR), application of the City of Inglewood's threshold criteria to the "With Phase I Project" scenario indicates that Phase I project development is expected to create a significant impact at the following study intersection during the Saturday mid-day peak hour.

- Intersection No. 47: Crenshaw Boulevard/Century Boulevard

Incremental but not significant impacts are noted at the remaining study intersections due to the Phase I project development. The traffic mitigation measure recommended for the proposed project at this location is anticipated to reduce the traffic impacts associated with Phase I project development to less than significant levels. Based on a review of the significantly impacted study location under Phase I project development, it is recommended that the project applicant provide full funding for ITS improvements at seven signalized intersections along Century Boulevard, between Prairie Avenue and Van Ness Avenue. It is anticipated that these ITS improvements can be integrated and synchronized with the City of Los Angeles' ATISAC system along the Century Boulevard corridor to the east. In addition, it is anticipated that the project design features/frontage improvements discussed previously will be completed at the following study intersections as part of the Phase I project development:

- Intersection No. 29: Prairie Avenue/Hardy Street
- Intersection No. 30: Prairie Avenue/Century Boulevard
- Intersection No. 38: Doty Street/Century Boulevard
- Intersection No. 39: Yukon Street/Century Boulevard
- Intersection No. 65: Proposed Signalized Driveway/Century Boulevard
- Intersection No. 66: Prairie Avenue/97th Street

Project Buildout Analysis (Phases I, II, and III)

The weekday trip generation forecast for Phases I & II project development is summarized in the Project Traffic Study. As shown, Phases I & II project development is expected to generate an additional 1,366 vehicle trips (570 more inbound trips and 796 more outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, Phases I & II project development is expected to generate 402 fewer vehicle trips (1,055 more inbound trips and 1,457 fewer outbound trips). Over a 24-hour period, Phases I & II project development is forecast to generate an additional 13,068 daily trip ends during a typical weekday (6,534 inbound trips and 6,534 outbound trips).

The weekend trip generation forecast for Phases I & II project development is summarized in the Project Traffic Study (see Appendix G-1 to this Draft EIR). As shown, Phases I & II project development is expected to generate an additional 1,076 vehicle trips (56 fewer inbound trips and 1,132 more outbound trips) during the weekend mid-day peak hour. Over a 24-hour period, Phases I & II project development is forecast to generate an additional 22,520 daily trip ends during a typical weekend day (11,260 inbound trips and 11,260 outbound trips).

In order to determine the operating conditions of the six study intersections with the Phases I & II project development, traffic associated with Phases I & II project development was assigned to the local roadway system based on the trip distribution and assignment characteristics consistent with the proposed project and the Phases I & II site access scheme. As shown in the Project Traffic Study (see Appendix G-1 to this Draft EIR), application of the City of Inglewood's threshold criteria to the "With Phases I & II Project" scenario indicates that Phases I & II project development is expected to create a significant impact at the following four study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour:

- Intersection No. 19: La Brea Avenue/Florence Avenue
- Intersection No. 25: Prairie Avenue/Florence Avenue
- Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard
- Intersection No. 47: Crenshaw Boulevard/Century Boulevard

Incremental but not significant impacts are noted at the remaining study intersections due to the Phases I & II project development. The traffic mitigation measures recommended for the Proposed Project at these four locations are anticipated to reduce the traffic impacts associated with Phases I & II project development to less than significant levels. Based on a review of the significantly impacted study locations under Phases I & II project development, it is recommended that the project applicant provide full funding for ITS improvements at a total of 16 signalized intersections. In addition to the ITS improvements recommended as part of the Phase I project development (i.e., at seven signalized intersections along Century Boulevard), it is recommended that ITS improvements be implemented at nine additional signalized intersections along the Crenshaw Boulevard, Florence Avenue, Centinela

Avenue, and La Brea Avenue corridors. It is anticipated that these ITS improvements can be integrated and synchronized with the City of Los Angeles' ATISAC system along the Century Boulevard, Crenshaw Boulevard, Florence Avenue, and Centinela Avenue corridors. In addition, it is anticipated that the project design features/frontage improvements discussed previously will be completed at the following study intersections as part of the Phases I & II project development:

- Intersection No. 28: Prairie Avenue/Arbor Vitae Street
- Intersection No. 29: Prairie Avenue/Hardy Street
- Intersection No. 30: Prairie Avenue/Century Boulevard
- Intersection No. 38: Doty Street/Century Boulevard
- Intersection No. 39: Yukon Street/Century Boulevard
- Intersection No. 65: Proposed Signalized Driveway/Century Boulevard
- Intersection No. 66: Prairie Avenue/97th Street

Project Phases I & II Analysis

A full discussion of the trip generation forecasts and traffic impacts analysis for the full build-out can be found in the Project Traffic Study. In addition to the ITS improvements recommended as part of Phase I and II project development at 16 signalized intersections, it is recommended that ITS improvements be implemented at three additional intersections along Century Boulevard, between the I-405 Freeway and La Brea Avenue.

Land Use Equivalency Program Impacts

A land use equivalency matrix has been prepared to provide development flexibility by permitting shifts of permitted floor area between certain land use categories, while maintaining the intent and regulatory requirements of the project. The equivalency program defines a specific framework within which certain land uses can be exchanged for other land uses without increasing potential traffic impacts. Under this program, Hollywood Park ultimately may be developed to achieve a revised range of land use mixes in order to respond to future market and region needs and demands. There can be increases in the square footages of certain land uses in exchange for corresponding decreases in the square footages of other land uses.

In order to implement the equivalency program, a set of equivalency factors have been prepared. The equivalency factor for each use is derived based on the project's general mix of land uses as currently proposed and the weekday PM peak hour project trip generation. Equivalency factors for the permitted uses are summarized in the Traffic Impact Study.

CUMULATIVE IMPACTS

Weekday Future Cumulative Conditions

The v/c ratio at the 66 study intersections are incrementally increased by the addition of traffic generated by the Related Projects. As shown in Table IV.L-2, application of the City's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative developments in the project vicinity are expected to create cumulative impacts at the following ~~22~~15 of the 66 study intersections during the weekday AM and/or PM peak hours:

- Int. No. 1: Sepulveda Boulevard/Slauson Avenue (PM Peak Hour - City of Culver City)
- Int. No. 2: Sepulveda Boulevard/Centinela Avenue (AM and PM Peak Hour - City of Los Angeles)
- Int. No. 3: La Cienega Boulevard (SB)/Slauson Avenue (PM Peak Hour - County of Los Angeles)
- Int. No. 5: La Tijera Boulevard/Centinela Avenue (AM Peak Hour - City of Los Angeles)
- Int. No. 7: La Cienega Boulevard/Centinela Avenue (AM and PM Peak Hour - City of Los Angeles)
- Int. No. 10: La Cienega Boulevard/Arbor Vitae Street (PM Peak Hour - City of Inglewood)
- ~~Int. No. 12: La Cienega Boulevard/Century Boulevard (PM Peak Hour - City of Los Angeles)~~
- Int. No. 15: Inglewood Avenue/Arbor Vitae Street (AM and PM Peak Hour - City of Inglewood)
- ~~Int. No. 16: Inglewood Avenue/Century Boulevard (PM Peak Hour - City of Inglewood)~~
- Int. No. 17: La Brea Avenue/Slauson Avenue (AM and PM Peak Hour - County of Los Angeles)
- Int. No. 20: La Brea Avenue/Manchester Boulevard (AM Peak Hour - City of Inglewood)
- Int. No. 23: Hawthorne Boulevard/Imperial Highway (PM Peak Hour - City of Hawthorne)
- ~~Int. No. 24: Centinela Avenue/Florence Avenue (AM and PM Peak Hour - City of Inglewood)~~
- Int. No. 26: Prairie Avenue/Manchester Boulevard (PM Peak Hour - City of Inglewood)
- ~~Int. No. 30: Prairie Avenue/Century Boulevard (AM Peak Hour - City of Inglewood)~~
- Int. No. 33: Prairie Avenue/Imperial Highway (AM Peak Hour - City of Hawthorne)
- Int. No. 35: Crenshaw Dr. Briarwood Lane/Manchester Blvd. (AM Peak Hour - City of Inglewood)
- ~~Int. No. 39: Yukon Avenue Gate 5/Century Boulevard (PM Peak Hour - City of Inglewood)~~

Int. No. 41: Crenshaw Boulevard/Slauson Avenue (PM Peak Hour - City of Los Angeles)

~~Int. No. 48: Crenshaw Boulevard/Imperial Highway (PM Peak Hour - City of Inglewood)~~

~~Int. No. 55: Western Avenue/Century Boulevard (PM Peak Hour - City of Los Angeles)~~

Int. No. 56: Vermont Avenue/Manchester Avenue (AM and PM Peak Hour - City of Los Angeles)

Incremental, but not significant cumulative impacts are noted at the remaining ~~44-51~~ study intersections during the weekday AM and PM peak hours. The future cumulative (existing, ambient growth, project and Related Projects) traffic volumes at the study intersections during the weekday AM and PM peak hours are displayed in Figures IV.L-22 and IV.L-23, respectively.

Saturday Future Cumulative Conditions

As shown in Table IV.L-2, application of the City's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative developments in the project vicinity are expected to create cumulative impacts at the following ~~nine-three~~ of the 66 study intersections during the Saturday mid-day peak hour:

Int. No. 2: Sepulveda Boulevard/Centinela Avenue (City of Los Angeles)

Int. No. 17: La Brea Avenue/Slauson Avenue (County of Los Angeles)

Int. No. 20: La Brea Avenue/Manchester Boulevard (City of Inglewood)

~~Int. No. 38: Doty Avenue Gate 4/Century Boulevard (City of Inglewood)~~

~~Int. No. 39: Yukon Avenue Gate 5/Century Boulevard (City of Inglewood)~~

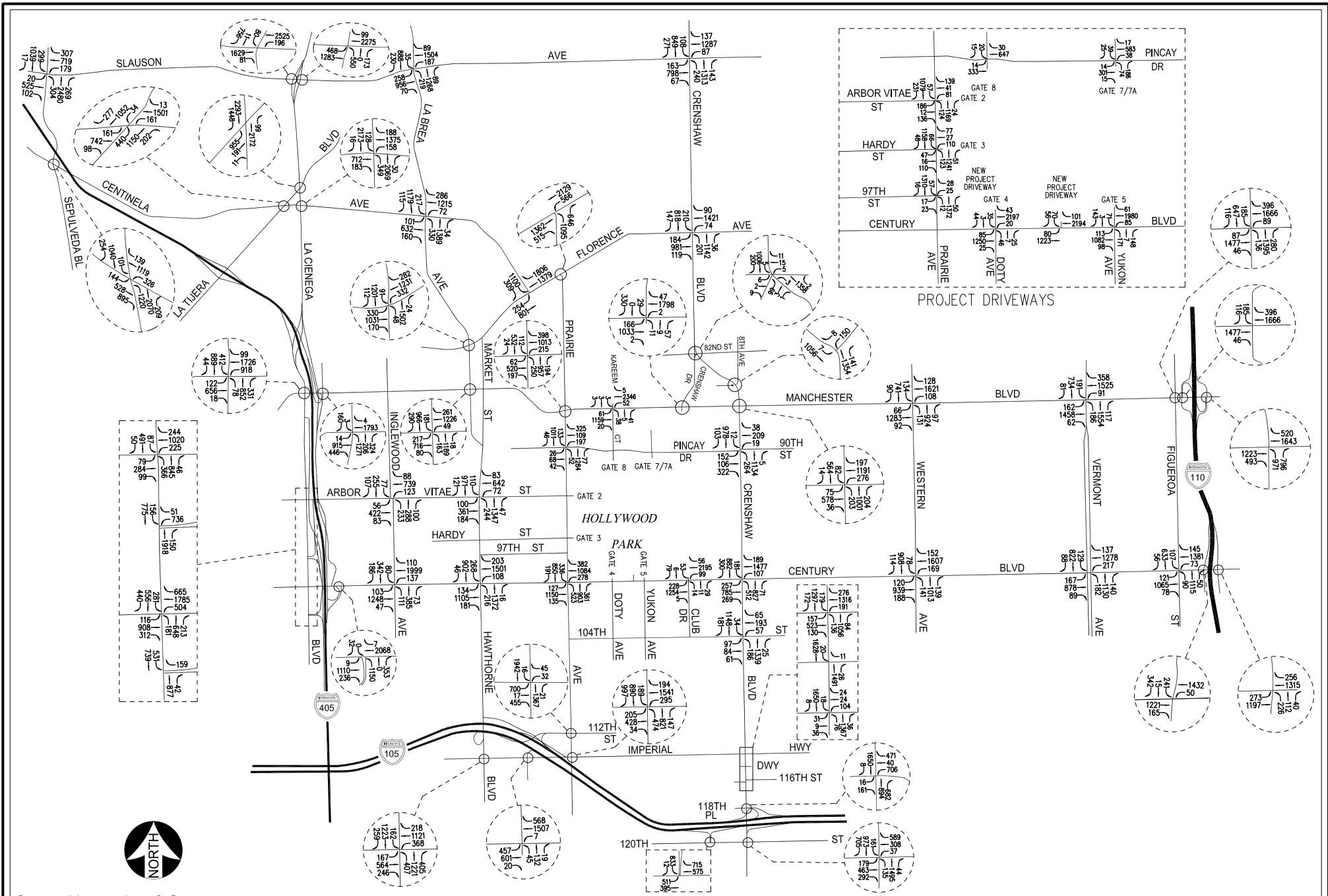
~~Int. No. 40: Club Drive/Century Boulevard (City of Inglewood)~~

~~Int. No. 42: Crenshaw Boulevard/Florence Avenue (City of Los Angeles)~~

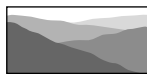
~~Int. No. 46: Crenshaw Boulevard/Pincay Drive 90th Street (City of Inglewood)~~

~~Int. No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood)~~

Incremental, but not significant cumulative impacts are noted at the remaining ~~57-63~~ study intersections during the Saturday mid-day peak hour. The future cumulative (existing, ambient growth, project and Related Projects) traffic volumes at the study intersections during the Saturday mid-day peak hour are displayed in Figure IV.L-24.

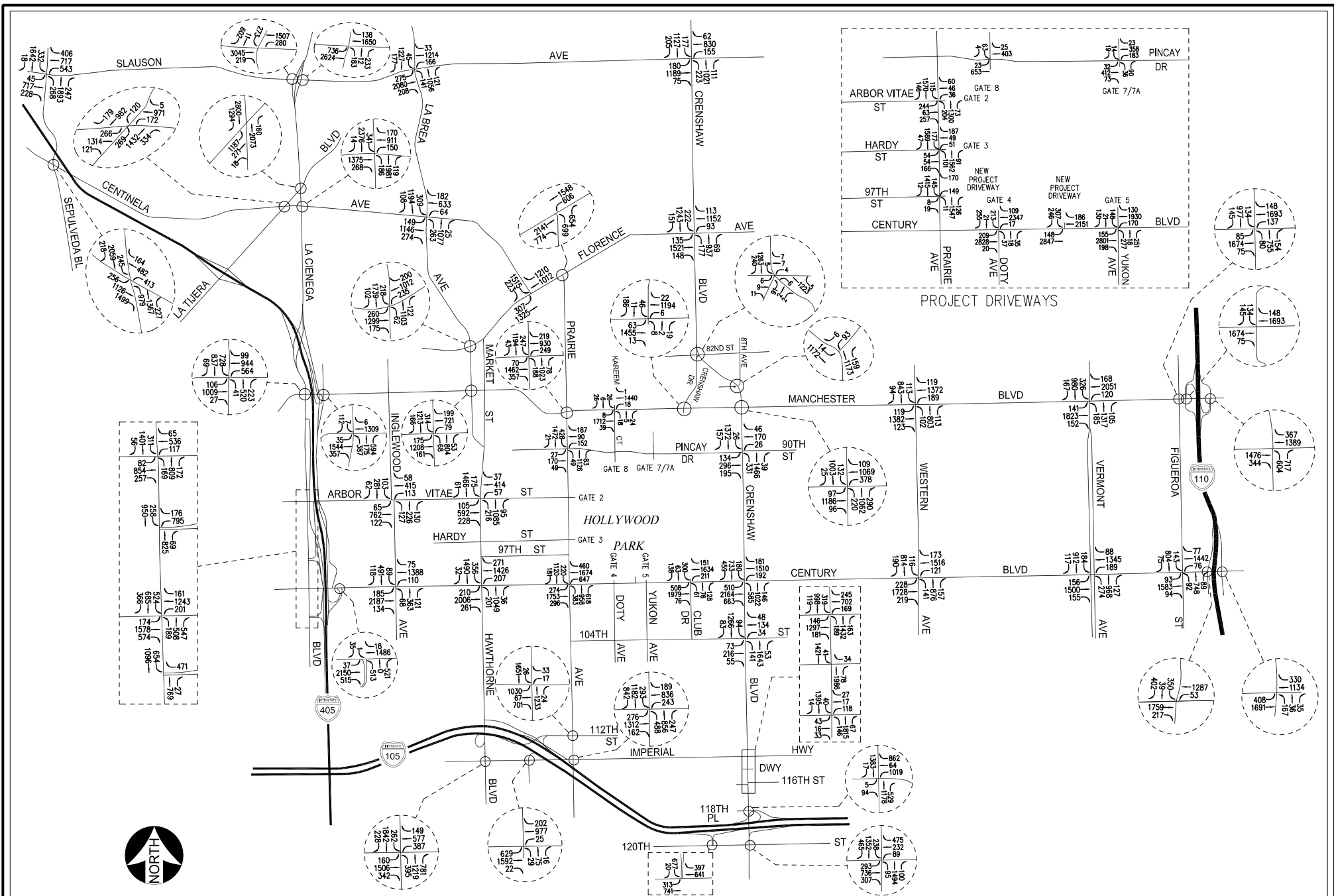


Source: Linscott, Law & Greenspan, 02/16/2009.

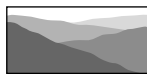


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Figure IV.L-22 [REVISED]
Future Cumulative Traffic Volumes
Weekday AM Peak Hour

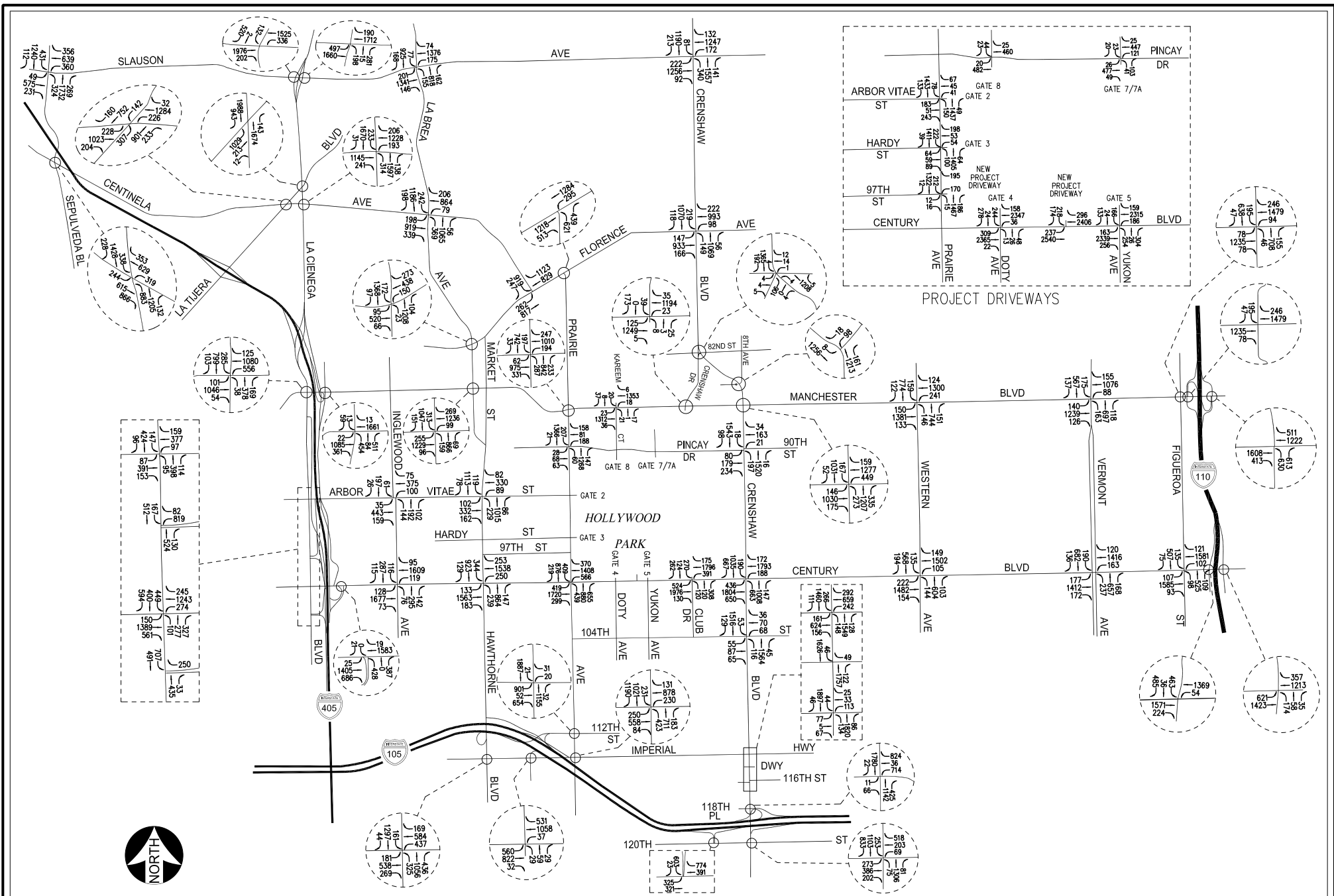


Source: Linscott, Law & Greenspan, 02/16/2009.

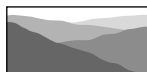


CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.L-23 [REVISED]
Future Cumulative Traffic Volumes
Weekday PM Peak Hour



Source: Linscott, Law & Greenspan, 02/16/2009.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.L-24 [REVISED]
Future Cumulative Traffic Volumes
Saturday Mid-Day Peak Hour

Cumulative Phasing Analysis

As discussed previously, the proposed project is planned to be constructed in three general phases, with build-out of the overall project anticipated by year 2014. The following sections summarize the results of additional traffic analyses prepared to identify the cumulative mitigation measures under each project development phase. This evaluation involved the preparation of supplemental intersection Level of Service analyses and the project's pro-rata percentage of cumulative improvement measures. It should be noted that the cumulative phasing analysis focused solely on the 27 study intersections that were forecast to be significantly impacted by the overall build-out of the proposed project and the related projects.

Phase I Cumulative Analysis

As shown in the Project Traffic Study, application of the City of Inglewood's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative development of the Phase I project and the related projects are expected to create cumulative impacts at the following 22 study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour:

- Int. No. 1: Sepulveda Boulevard-Slauson Avenue
- Int. No. 2: Sepulveda Boulevard/Centinela Avenue
- Int. No. 3: La Cienega Boulevard (SB)/Slauson Avenue
- Int. No. 5: La Tijera Boulevard/Centinela Avenue
- Int. No. 7: La Cienega Boulevard/Centinela Avenue
- Int. No. 10: La Cienega Boulevard/Arbor Vitae Street
- Int. No. 15: Inglewood Avenue/Arbor Vitae Street
- Int. No. 16: Inglewood Avenue/Century Boulevard
- Int. No. 17: La Brea Avenue/Slauson Avenue
- Int. No. 20: La Brea Avenue/Manchester Boulevard
- Int. No. 23: Hawthorne Boulevard/Imperial Highway
- Int. No. 24: Centinela Avenue/Florence Avenue
- Int. No. 26: Prairie Avenue/Manchester Boulevard
- Int. No. 33: Prairie Avenue/Imperial Highway

- Int. No. 35: Crenshaw Drive-Briarwood Lane/Manchester Boulevard
- Int. No. 38: Doty Avenue-Gate 4/Century Boulevard
- Int. No. 39: Yukon Avenue-Gate 5/Century Boulevard
- Int. No. 40: Club Drive/Century Boulevard
- Int. No. 41: Crenshaw Boulevard/Slauson Avenue
- Int. No. 47: Crenshaw Boulevard/Century Boulevard
- Int. No. 55: Western Avenue/Century Boulevard
- Int. No. 56: Vermont Avenue/Manchester Avenue

The cumulative traffic mitigation measures recommended in Section 12.1 of the Project Traffic Study at these locations are anticipated to reduce the forecast cumulative impacts to less than significant levels, as shown in the Project Traffic Study. The project Phase I development will contribute its fair share to the cumulative mitigation measures. As summarized in the Project Traffic Study, the project Phase I development's fair share contribution toward the cumulative improvements ranges from no contribution to 10.2%.

Phases I & II Cumulative Analysis

As shown in the Project Traffic Study, application of the City of Inglewood's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative development of the Phases I & II project and the related projects are expected to create cumulative impacts at the following 25 study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour:

- Int. No. 1: Sepulveda Boulevard-Slauson Avenue
- Int. No. 2: Sepulveda Boulevard/Centinela Avenue
- Int. No. 3: La Cienega Boulevard (SB)/Slauson Avenue
- Int. No. 5: La Tijera Boulevard/Centinela Avenue
- Int. No. 7: La Cienega Boulevard/Centinela Avenue
- Int. No. 10: La Cienega Boulevard/Arbor Vitae Street
- Int. No. 12: La Cienega Boulevard/Century Boulevard

- Int. No. 15: Inglewood Avenue/Arbor Vitae Street
- Int. No. 16: Inglewood Avenue/Century Boulevard
- Int. No. 17: La Brea Avenue/Slauson Avenue
- Int. No. 20: La Brea Avenue/Manchester Boulevard
- Int. No. 23: Hawthorne Boulevard/Imperial Highway
- Int. No. 24: Centinela Avenue/Florence Avenue
- Int. No. 26: Prairie Avenue/Manchester Boulevard
- Int. No. 30: Prairie Avenue/Century Boulevard
- Int. No. 33: Prairie Avenue/Imperial Highway
- Int. No. 35: Crenshaw Drive-Briarwood Lane/Manchester Boulevard
- Int. No. 38: Doty Avenue-Gate 4/Century Boulevard
- Int. No. 39: Yukon Avenue-Gate 5/Century Boulevard
- Int. No. 40: Club Drive/Century Boulevard
- Int. No. 41: Crenshaw Boulevard/Slauson Avenue
- Int. No. 46: Crenshaw Boulevard/Pincay Drive-90th Street
- Int. No. 47: Crenshaw Boulevard/Century Boulevard
- Int. No. 55: Western Avenue/Century Boulevard
- Int. No. 56: Vermont Avenue/Manchester Avenue

The cumulative traffic mitigation measures recommended in Section 12.1 of the Project Traffic Study at these locations are anticipated to reduce the forecast cumulative impacts to less than significant levels, as shown in the Project Traffic Study. The project Phases I & II development will contribute its fair share to the cumulative mitigation measures. As summarized in the Project Traffic Study, the project Phases I & II development's fair share contribution toward the cumulative improvements ranges from no contribution to 19.4%.

Phases I, II & III Cumulative Analysis

The future cumulative traffic impact analysis for full build-out of the Project (Phase I, II and III) are included in the Project Traffic Study. As summarized in the Project Traffic Study, the build-out fair share contribution towards the cumulative improvements ranges from no contribution to 22.6%.

PROJECT DESIGN FEATURES

The following Project Design Features are incorporated into the Project Description and were used in the basis for formulating portions of the environmental analysis with respect to traffic and transportation impacts. As such, it is recommended that the lead agency incorporate the following Project Design Features as conditions of Project approval.

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

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

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

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

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

Widen and restripe the westbound Century Boulevard approach along the north side to provide an exclusive right-turn lane. The resultant lane configurations on the westbound Century Boulevard approach will be one left-turn lane, three through lanes, and one right-turn only lane. In addition, modify the traffic signal to provide a westbound right-turn

overlapping phase to be operated concurrently with the southbound left-turn phase. This intersection will be improved as part of Phase I development.

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

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

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

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

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

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

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

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

Boulevard approach will be three through lanes and one right-turn only lane. This intersection will be improved as part of Phase I development.

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

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

In addition to the features above, the Applicant has agreed to contribute to fund the Project's pro-rata share of the costs of the following measure as a Project Design Feature (PDF) in response to the comment letter provided by the County of Los Angeles Department of Public Works (see Response to Comment 2.7 in Section IV of this Final EIR):

PDF L-9. La Cienega Boulevard Northbound Ramp at Slauson Avenue (County of Los Angeles).

South approach: Two left-turn lanes and one shared through/right-turn lane instead of one left-turn lane and one shared through/left-/right-turn lane. The Project Applicant shall contribute 5.4% (or \$64,800) of the total estimated cost of the identified improvements.

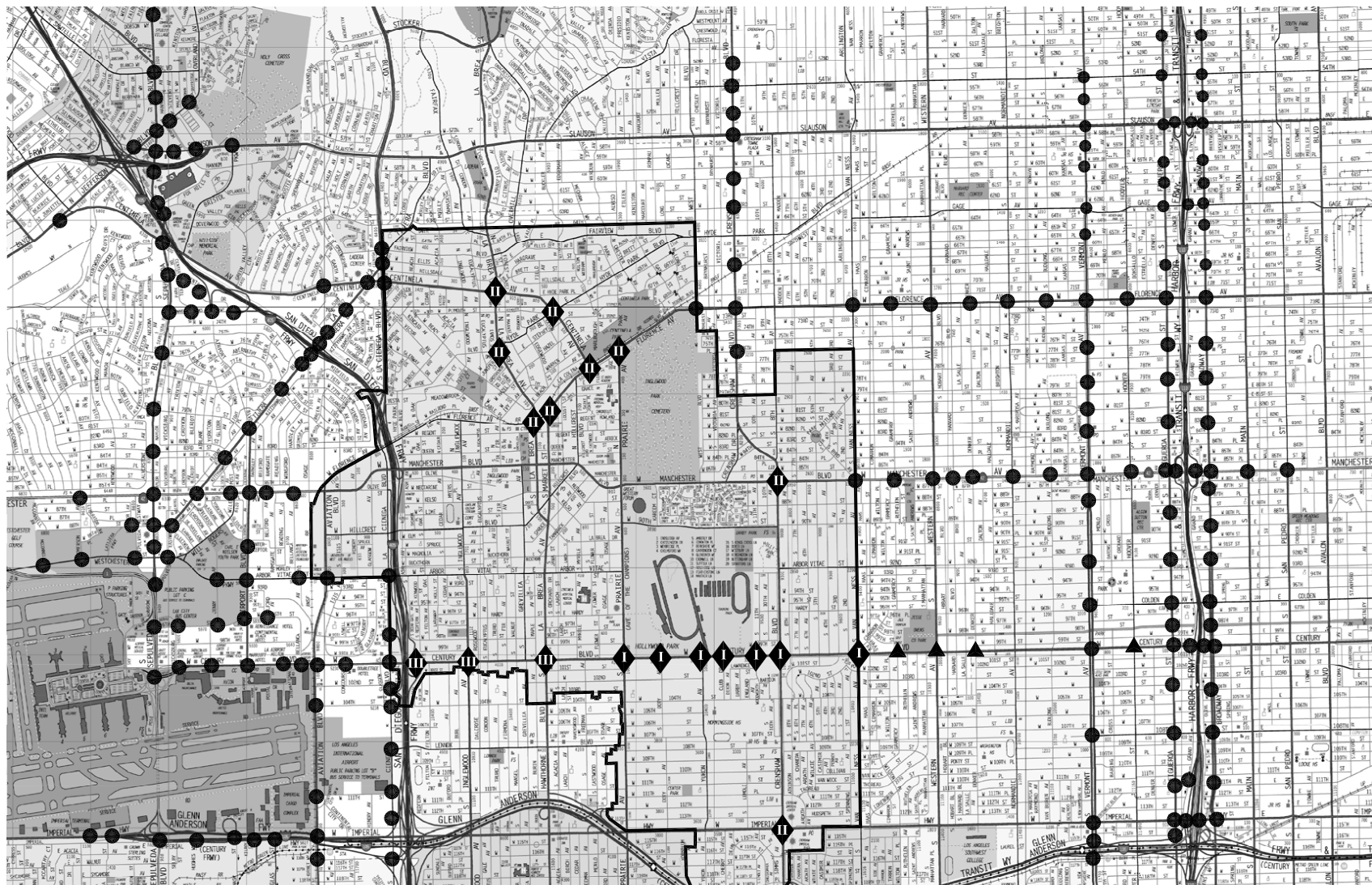
MITIGATION MEASURES

Project Impact Mitigation Measures







Application of the City of Inglewood's threshold criteria to the "With Proposed Project" scenario indicates that six of the 66 study intersections are anticipated to be significantly impacted due to traffic generated by the Hollywood Park Redevelopment Project. Transportation mitigation measures typically consist of improvements such as traffic signal modifications and/or intersection restriping and roadway widening to accommodate additional travel lanes. The Project Applicant proposes as its primary mitigation strategy a funding contribution to continue development and enhancement of the City's Intelligent Transportation System (ITS). The ITS system will enhance the ability of the traffic signal controller to adjust traffic signal timing and intersections on a real-time basis and synchronize traffic signals along key roadways in response to changing traffic volume patterns. Traffic signal system enhancements such as the City of Inglewood ITS program have been shown to increase the effective intersection capacity by at least ten percent (10%), as before and after studies within other jurisdictions have demonstrated capacity enhancements ranging between 12 and 15 percent. ITS also gives immediate

results over more time-consuming physical roadway improvements, which may involve physical right-of-way constraints, eminent domain for privately owned parcels, lengthy construction time, and in many cases surface parking may be displaced or lost due to roadway widening measures. Furthermore, the City of Inglewood is surrounded by the City of Los Angeles Automatic Traffic Surveillance and Control (ATSAC) system. If the City of Inglewood ITS improvements were linked to the ATSAC system, a fully integrated automated network would improve traffic conditions along major roadways traversing through Inglewood. For a discussion of alternative roadway improvements that were deemed infeasible or otherwise not desirable, see Appendix G-1 of this EIR.

- MM L-1. ***Intersection No. 18: La Brea Avenue/Centinela Avenue (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-2. ***Intersection No. 19: La Brea Avenue/Florence Avenue (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-3. ***Intersection No. 22: La Brea Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development (see Figure IV.L-25).
- MM L-4. ***Intersection No. 25: Prairie Avenue/Florence Avenue (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-5. ***Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-6. ***Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. In addition, widen the west side of Crenshaw Boulevard north of Century Boulevard by



Legend

-  CITY OF INGLEWOOD BOUNDARY
-  PROPOSED PROJECT PHASE I ITS LOCATION
-  LADOT ATSAC LOCATION
-  PROPOSED PROJECT PHASE II ITS LOCATION
-  LADOT ATSAC LOCATION (TO BE COMPLETED)
-  PROPOSED PROJECT PHASE III ITS LOCATION

Source: Linscott, Law & Greenspan, Engineers, August 1, 2008.

approximately seven feet for a distance of 145 feet (within the existing public right-of-way) and restripe to provide a southbound right-turn only lane. The resultant southbound approach lane configuration would provide one left-turn lane, three through lanes, and one right-turn only lane. The existing traffic signal will be modified to provide a southbound right-turn overlapping phase to be operated concurrently during the eastbound left-turn phase. This improvement will be part of Phase I development (see Figure IV.L-25).

In addition to the Project's six impacted intersections, the Project Applicant will provide full funding for a traffic signal synchronization network at an additional 13 intersections, for a total of 19 ITS improved intersections. The additional 13 intersections are listed below, along with the phase in which it will be implemented.

- MM L-7. ***Intersection No. 24: Centinela Avenue/Florence Avenue (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MML-8. ***Intersection No. 14: I-405 Northbound Ramps/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development (see Figure IV.L-25).
- MML-9. ***Intersection No. 16: Inglewood Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase III development (see Figure IV.L-25).
- MM L-10. ***Intersection No. 30: Prairie Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).
- MM L-11. ***Intersection No. 38: Doty Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).
- MM L-12. ***Intersection No. 39: Yukon Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).

- MM L-13. ***Intersection No. 40: Club Drive/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).
- MM L-14. ***Intersection No. 51: Crenshaw Boulevard/Imperial Highway (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-15. ***Non-Study Intersection: La Brea Avenue/Hyde Park Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-16. ***Non-Study Intersection: Market Street/Florence Avenue (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-17. ***Non-Study Intersection: Centinela Avenue/Hyde Park Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase II development (see Figure IV.L-25).
- MM L-18. ***Non-Study Intersection: 11th Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).
- MM L-19. ***Non-Study Intersection: Van Ness Avenue/Century Boulevard (City of Inglewood).*** The Project Applicant shall provide the funding contribution to develop or enhance the City of Inglewood Intelligent Transportation System (ITS) at this intersection. This improvement will be part of Phase I development (see Figure IV.L-25).

Cumulative Impact Mitigation Measures

Cumulative development of the Proposed Project and the Related Projects are expected to create cumulative impacts at 27 study intersections during the weekday AM peak hour, PM peak hour, and/or the Saturday mid-day peak hour (14 of which are located in the City of Inglewood). It should be noted that approval of some of the cumulative mitigation measures associated with study intersections located outside of Inglewood is beyond the control of the City of Inglewood (the Lead Agency). The Proposed Project will contribute its fair-share to the cumulative mitigation measures, as indicated, for each

mitigation measure identified below. The cumulative impact fair share measures shall be phased based upon the total amount of trips to be generated by a particular increment of development, at the time of site plan or other site specific approval.

MM L-20. ***Intersection No. 1: Sepulveda Boulevard/Slauson Avenue (City of Culver City).*** To the extent that Culver City (1) adopts a transportation improvement or similar fee that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Culver City determines to approve the implementation of the following improvements, the Project Applicant shall contribute 4.3% of the estimated total estimated cost of implementing the following roadway improvements: (1) Provide a northbound right-turn only lane within the northbound approach lane at this intersection, and (2) Modify the eastbound approach on Slauson Avenue at Sepulveda Boulevard to provide one additional through lane. The resultant northbound approach lane configuration would provide two left-turn lanes, three through lanes, and one right-turn only lane. The resultant eastbound approach lane configuration would provide one left-turn lane, three through lanes, and one right-turn only lane. It should be noted that there are three existing departure lanes on Slauson Avenue east of Sepulveda Boulevard.

MM L-21. ***Intersection No. 2: Sepulveda Boulevard/Centinela Avenue (City of Los Angeles).*** To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of the City of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute 0.45% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional northbound left-turn lane, (2) Modify the southbound approach on Sepulveda Boulevard at Centinela Avenue to provide one additional through lane, and (3) Contribute 0.45% of the total cost to install the Adaptive Traffic Control System (ATCS) at this intersection. The resultant northbound approach lane configuration would provide three left-turn lanes, three through lanes, and one right-turn only lane. The resultant southbound approach lane configuration would provide two left-turn lanes, four through lanes, and one right-turn only lane. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures so that the measures may ultimately be infeasible.

MM L-22. ***Intersection No. 3: La Cienega Boulevard (SB)/Slauson Avenue (County of Los Angeles).*** Los Angeles County: North approach: One left-turn lane, one shared through/right-turn lane, and one exclusive right-turn lane instead of one shared through/left-/right-turn lane and an exclusive right-turn lane. The Project Applicant shall contribute 5.3% (or \$27,825) of the total estimated cost of the identified improvements at

~~this location. The Project Applicant shall contribute 5.3% of the total estimated cost to develop and enhance the traffic signal operations at this location.~~

- MM L-23. **Intersection No. 5: La Tijera Boulevard/Centinela Avenue (City of Los Angeles).** The Project Applicant shall contribute 5.1% of the total estimated cost to develop and enhance the traffic signal operations at this location.
- MM L-24. **Intersection No. 7: La Cienega Boulevard/Centinela Avenue (City of Los Angeles).** To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute ~~0.4~~1.8% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional left-turn lane on both the northbound and southbound La Cienega Boulevard approaches, and (2) Contribute ~~0.4~~1.8% of the total cost to install the ATCS at this location. The resultant northbound and southbound approach lane configurations would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane.
- MM L-25. **Intersection No. 10: La Cienega Boulevard/Arbor Vitae Street (City of Inglewood).** The Project Applicant shall contribute ~~8.5~~11.4% of the total estimated cost to develop and enhance the City of Inglewood ITS program at this intersection.
- MM L-26. **Intersection No. 12: La Cienega Boulevard/Century Boulevard (City of Los Angeles).** The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.
- MM L-27. **Intersection No. 15: Inglewood Avenue/Arbor Vitae Street (City of Inglewood).** The Project Applicant shall contribute ~~18.8~~25.3% of the total estimated cost to implement the following roadway improvements: (1) Restrict parking along the north side of Arbor Vitae Street during the weekday AM peak hour so as to allow the westbound approach curb lane to function as a shared through/right-turn lane through the intersection, and (2) Restrict parking along the south side of Arbor Vitae Street during the weekday PM peak hour so as to allow the eastbound approach curb lane to function as a shared through/right-turn lane through the intersection. The resultant westbound approach lane configuration during the weekday AM peak hour would provide one left-turn lane, one through lane, and one shared through/right-turn lane. The resultant eastbound approach lane configuration during the weekday PM peak hour would provide one left-turn lane, one through lane, and one shared through/right-turn lane.

- MM L-28. **Intersection No. 16: Inglewood Avenue/Century Boulevard (City of Inglewood).** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-29. **Intersection No. 17: La Brea Avenue/Slauson Avenue (County of Los Angeles).** To the extent that the County of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles County determines to approve the implementation of the following improvements, the Project Applicant shall contribute ~~5.16.3%~~ of the total estimated cost to implement the following roadway improvements: (1) Re-stripe the southbound La Brea Avenue approach at Slauson Avenue to provide a shared through/right-turn lane through the intersection, (2) Modify the existing traffic signal to remove the existing southbound overlapping right-turn signal phase, and (3) Contribute ~~5.16.3%~~ of the total cost to develop and enhance the traffic signal operations at this location. The resultant southbound approach lane configuration would provide a left-turn lane, two through lanes, and one shared through/right-turn lane. It should be noted that there are three existing departure lanes on La Brea Avenue south of Slauson Avenue.
- MM L-30. **Intersection No. 20: La Brea Avenue/Manchester Boulevard (City of Inglewood).** The Project Applicant shall contribute ~~5.38.2%~~ of the total estimated cost to implement the following roadway improvements: (1) Provide an additional northbound through lane, (2) Restrict parking along the north side of Manchester Boulevard adjacent to La Brea Avenue during the Saturday Mid-day peak hour and convert the westbound approach right-turn only lane into a shared through/right-turn lane through the intersection, and (3) Contribute ~~5.38.2%~~ of the cost estimated to develop and enhance the City of Inglewood ITS program at this intersection. Some parking along the east side of La Brea Avenue will need to be restricted during these time periods and some widening may be required to accommodate this measure. The resultant northbound approach lane configuration would provide one left-turn lane, two through lanes, and one shared through/right-turn lane through the intersection. The resultant westbound approach lane configuration during the Saturday Mid-day peak hour would provide one left-turn lane, two through lanes, and one shared through/right-turn lane.
- MM L-31. **Intersection No. 23: Hawthorne Boulevard/Imperial Highway (City of Hawthorne)** To the extent that the City of Hawthorne (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Hawthorne determines to approve the implementation of the following improvements, the Project Applicant shall contribute

7.32% of the total estimated cost to implement the following roadway improvements: (1) Provide an additional northbound right-turn only lane; (2) Modify the southbound approach to provide one additional through lane; (3) Modify the westbound approach to provide an additional westbound left-turn lane; and (4) Contribute 7.23% of the total estimated cost to develop and enhance the traffic signal operations at this location. The resultant northbound approach lane configuration would provide two left-turn lanes, three through lanes, and two right-turn only lanes. The resultant southbound approach lane configuration would provide one left-turn lane, three through lanes, and one shared through/right-turn lane. The resultant westbound approach lane configuration would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures so that the measures may ultimately be infeasible.

- MM L-32. ***Intersection No. 24: Centinela Avenue/Florence Avenue (City of Inglewood).*** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection to implement the following roadway improvements: (1) Convert the southbound Centinela Avenue approach right-turn only lane at Florence Avenue to provide a shared left-turn/right-turn lane, and (2) develop and enhance the City of Inglewood ITS program at this intersection. The resultant southbound approach lane configuration would provide two left-turn lanes and one shared left-turn/right-turn lane.
- MM L-33. ***Intersection No. 26: Prairie Avenue/Manchester Boulevard (City of Inglewood).*** The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.
- MM L-34. ***Intersection No. 30: Prairie Avenue/Century Boulevard (City of Inglewood).*** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-35. ***Intersection No. 33: Prairie Avenue/Imperial Highway (City of Hawthorne).*** To the extent the City of Hawthorne adopts a city-wide signal synchronization program, the Project Applicant shall contribute 17.3% of the total estimated cost to develop and enhance the ITS program (or a similar traffic signal synchronization system) at this intersection.
- MM L-36. ***Intersection No. 35: Crenshaw Drive-Briarwood Lane/Manchester Boulevard (City of Inglewood).*** The Project Applicant shall contribute ~~22.6~~25.5% of the total estimated cost to develop and enhance the City of Inglewood ITS program at this intersection.

- MM L-37. **Intersection No. 38: Doty Avenue-Gate 4/Century Boulevard (City of Inglewood).** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-38. **Intersection No. 39: Yukon Avenue-Gate 5/Century Boulevard (City of Inglewood).** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-39. **Intersection No. 40: Club Drive/Century Boulevard (City of Inglewood).** No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-40. **Intersection No. 41: Crenshaw Boulevard/Slauson Avenue (City of Los Angeles).** The Proposed Project's pro-rata contribution to fund improvements at this intersection has been calculated to be 0.0%, because under existing conditions the racetrack uses generate more traffic than the Proposed Project. Therefore, the Proposed Project's impact is not cumulatively considerable and no mitigation is required.
- MM L-41. **Intersection No. 42: Crenshaw Boulevard/Florence Avenue (City of Los Angeles).** The Project Applicant shall contribute 2.4% of the funding towards the installation of the ATSAC at this intersection (as this intersection is not currently operated under the City's ATSAC system).
- MM L-42. **Intersection No. 46: Crenshaw Boulevard/Pincay Drive-90th Street (City of Inglewood).** The Project Applicant shall contribute 18.4% of the total estimated cost to implement the following roadway improvements: (1) Restrict parking along the west side of Crenshaw Boulevard north of Pincay Drive-90th Street during the Saturday Mid-day peak hour to allow the southbound curb lane to function as a shared through/right-turn lane; and (2) Contribute 18.4% to develop and enhance the City of Inglewood ITS program at this intersection.
- MM L-43. **Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).** The Project Applicant shall contribute 2.7% of the total estimated cost to implement the following roadway improvements: (1) Widen the northbound Crenshaw Boulevard approach to provide two left-turn lanes, two through lanes, and one shared through/right-turn lane; (2) Widen the southbound Crenshaw Boulevard approach to provide one left-turn lane, three through lanes, and two right-turn only lanes; (3) Widen the eastbound Century Boulevard approach to provide two left-turn lanes, three through lanes, and one right-turn only lane; (4) Widen the westbound Century Boulevard approach to provide two left-turn lanes, three through lanes, and one shared through/right-turn lane; and (5)

Modify the traffic signal to provide southbound and eastbound right-turn overlapping phases to be operated concurrently during the eastbound and northbound left-turn phases, respectively. It should be noted that some right-of-way acquisition may be required to accommodate these cumulative mitigation measures, and/or other factors such as impacts on parking or adjacent businesses, may cause the lead agency to ultimately conclude that these proposed measures are infeasible.

- MM L-44. ***Intersection No. 48: Crenshaw Boulevard/Imperial Highway (City of Inglewood)***. No fair share contribution from the proposed project would be required, as the project applicant has proposed to provide full funding of the recommended ITS improvements at this intersection.
- MM L-45. ***Intersection No. 55: Western Avenue/Century Boulevard (City of Los Angeles)***. The Project Applicant shall contribute 9.2% of the funding towards the installation of the ATSAC at this intersection (as this intersection is not currently operated under the City of Los Angeles' ATSAC system).
- MM L-46. ***Intersection No. 56: Vermont Avenue/Manchester Avenue (City of Los Angeles)***. To the extent that the City of Los Angeles (1) adopts a transportation improvement or similar fee, that provides the funding for the following improvements, and requires all other new development impacting this intersection to also contribute to the following improvements, and (2) the legislative body of Los Angeles determines to approve the implementation of the following improvements, the Project Applicant shall contribute ~~6~~9.9% of the total estimated cost of implementing the following roadway improvements: (1) Provide an additional left-turn lane on the southbound Vermont Avenue approach at Manchester Avenue; and (2) Contribute ~~6~~9.9% of the total cost to install the ATSAC/ATCS at the Vermont Avenue/Manchester Avenue intersection (as this intersection is not currently operated under the City of Los Angeles' ATSAC system). The resultant southbound approach lane configuration would provide two left-turn lanes, two through lanes, and one shared through/right-turn lane.

LEVEL OF IMPACT AFTER MITIGATION

Project Impacts

The Proposed Project will result in significant traffic impacts at six of the 66 study intersections during the weekday AM peak hour, PM peak hour and/or Saturday mid-day peak hour. The recommended mitigation measures for the impacted intersections include funding contributions towards developing and enhancing the ITS program (i.e., a traffic signal upgrade) at these locations. Traffic signal enhancements such as the City of Inglewood ITS program have been demonstrated to increase the effective intersection capacity by at least ten percent (10%). The project applicant will fund the installation of the traffic signal improvements at the affected intersections to mitigate the project's impact at these locations.

Implementation of the mitigation measures identified above is expected to reduce project impacts at the six intersections to less than significant levels as detailed below:

- MM L-1. **Intersection No. 18: La Brea Avenue/Centinela Avenue (City of Inglewood).** The proposed mitigation for this intersection is expected to improve the v/c ratio from 1.004 (LOS F) to 0.904 (LOS E) during the weekday AM peak hour. Thus, the weekday AM peak hour impact at this intersection is expected to be mitigated to a less-than-significant level.
- MM L-2. **Intersection No. 19: La Brea Avenue/Florence Avenue (City of Inglewood).** The proposed mitigation is expected to improve the v/c ratio from 1.236 (LOS F) to 1.136 (LOS F) during the weekday AM peak hour and from 1.192 (LOS F) to 1.092 (LOS F) during the weekday PM peak hour. Thus, the weekday AM and PM peak hour impact at this intersection is expected to be mitigated to a less-than-significant level.
- MM L-3. **Intersection No. 22: La Brea Avenue/Century Boulevard (City of Inglewood).** The proposed mitigation is expected to improve the v/c ratio from 1.001 (LOS F) to 0.901 (LOS E) during the weekday PM peak hour. Thus, the weekday PM peak hour impact at this intersection is expected to be mitigated to a less than significant level.
- MM L-4. **Intersection No. 25: Prairie Avenue/Florence Avenue (City of Inglewood).** The proposed mitigation is expected to improve the v/c ratio from 1.056 (LOS F) to 0.956 (LOS E) during the weekday AM peak hour and from 1.045 (LOS F) to 0.945 (LOS E) during the weekday PM peak hour. Thus, the weekday AM and PM peak hour impact at this intersection is expected to be mitigated to a less than significant level.
- MM L-5. **Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard (City of Inglewood).** The proposed mitigation is expected to improve the v/c ratio from 1.015 (LOS F) to 0.915 (LOS E) during the weekday PM peak hour and from 1.046 (LOS F) to 0.946 (LOS E) during the Saturday mid-day peak hour. Thus, the weekday PM and Saturday mid-day peak hour impact at this intersection is expected to be mitigated to a less than significant level.
- MM L-6. **Intersection No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).** The proposed mitigation is expected to improve the v/c ratio from 1.155 (LOS F) to 1.055 (LOS F) during the Saturday mid-day peak hour. Thus, the Saturday mid-day peak hour impact at this intersection is expected to be mitigated to a less than significant level.

One of the impacted intersections is also part of the CMP intersection monitoring program. The above mitigation measures will reduce the Proposed Project's impact at this intersection to less than significant levels based on CMP impact criteria.

Cumulative Impacts

As summarized in the Future Cumulative Conditions section of the Traffic Study, application of the City's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative development of the Proposed Project and the Related Projects are expected to create significant cumulative impacts at 27 study intersections during the weekday AM peak hour, PM peak hour, and/or the Saturday mid-day peak hour (14 of which are located in the City of Inglewood).

The Proposed Project's pro-rata or fair-share contribution to fund improvements at the following three study intersections was calculated at 0.0%:

- Int. No. 12: La Cienega Boulevard/Century Boulevard (City of Los Angeles);
- Int. No. 26: Prairie Avenue/Manchester Boulevard (City of Inglewood);
- Int. No. 41: Crenshaw Boulevard/Slauson Avenue (City of Los Angeles); and

Accordingly, the Proposed Project's cumulative impact at these intersections is not cumulatively considerable and thus less than significant. For the remaining intersections, and except as discussed in further detail below, the Proposed Project's fair-share contribution to fund mitigation measures, which are within the responsibility and jurisdiction of another public agency can and should be implemented by such other public agency, would mitigate the Proposed Project's cumulative impacts to a level that is less than cumulatively considerable. At least three of the proposed mitigation measures, however, may involve significant roadway widening and/or right-of-way acquisition or create economic or other impacts to adjacent uses such that they are ultimately determined to be infeasible by the responsible jurisdiction. Namely these mitigation measures and intersections include the following:

- (L-8) Int. No. 2: Sepulveda Boulevard/Centinela Avenue (City of Los Angeles);
- (L-18) Int. No. 23: Hawthorne Boulevard/Imperial Highway (City of Hawthorne); and
- (L-30) Int. No. 47: Crenshaw Boulevard/Century Boulevard (City of Inglewood).

For these intersections, the cumulative impacts would be considered significant and unavoidable if the recommended mitigation measures are not fully implemented by the respective jurisdiction.

IV. ENVIRONMENTAL IMPACT ANALYSIS

M. PARKING

INTRODUCTION

This Section addresses the amount of parking that would be required and provided within the Proposed Project. The analysis provides an assessment of the City of Inglewood's Municipal Code parking requirements and the anticipated parking demand for the proposed Hollywood Park Redevelopment Project. The ~~following~~ discussion summarizes, in part, the findings and conclusions from the Shared Parking Analysis for the Hollywood Park Project, prepared by Walker Parking Consultants (~~September 25, 2007~~ February 9, 2009) which addresses the parking demand methodology proposed to be used in the Mixed-Use ~~zone~~ Zone of the Proposed Project. This ~~Section~~ section also includes a discussion of the parking requirements for the residential neighborhoods of the Proposed Project as provided in the Hollywood Park Specific Plan. The Shared Parking Analysis is included in its entirety into Appendix G-2, of this Draft EIR and Appendix L of the Final EIR.

ENVIRONMENTAL SETTING

Regulatory Framework

City of Inglewood Parking Requirements

Inglewood Municipal Code Article 19 – Parking Regulations sets forth current parking supply requirements for the City of Inglewood. In general, parking requirements developed by cities consider each land use to stand alone, without consideration for the possibility of sharing parking with surrounding land uses. The City of Inglewood's off-street parking regulations for the applicable residential and commercial land uses that could be included within the proposed Hollywood Park Redevelopment Project are provided below:

Residential Parking Requirements

Pursuant to Section 12-43 of the Inglewood Municipal Code, the number of off-street automobile parking spaces provided for each of the following uses shall be not less than the following requirements:

- One or Two Dwelling Units on One Lot. Two fully enclosed parking spaces for each unit.
- Three or More Dwelling Units on One Lot. Two fully enclosed parking spaces for each unit. Any combination of rooms, so arranged that they can be easily converted into separate living quarters, shall be counted as an additional dwelling unit.

- Visitor Parking. For all multiple-unit residential facilities having six or more units, one additional parking space for visitors shall be provided on-site per every three units.

Commercial Parking Requirements

Off-street parking requirements for commercial land uses are established in Section 12-44 of the Inglewood Municipal Code. The following list identifies the aggregate amount of off-street parking spaces provided in connection with each of the following commercial uses that could potentially be developed within the proposed Hollywood Park Redevelopment Project:

- General Business, Retail or Wholesale. For facilities not larger than eighteen thousand square feet in floor area: one parking space for each three hundred square feet of gross floor area. For facilities larger than eighteen thousand square feet in floor area: sixty parking spaces, plus one parking space for each additional four hundred square feet of gross floor area in excess of eighteen thousand square feet of floor area.
- Offices, Business and Professional, Other than Medical and Dental. One space for each three hundred square feet of gross floor area.
- Bakeries, Confectioneries, Take-out Restaurants (where food is not consumed on the premises). One parking space for each three hundred square feet of gross floor area.
- Banks, Savings-and-loans, or Check-cashing Stores. One space for each one hundred fifty square feet of gross floor area.
- Health Clubs and Studios for Music, Dance, Martial Arts and Similar Activities. One parking space for each one hundred fifty square feet of gross floor area.
- Hotels or Motels. For facilities having more than one hundred bedrooms: one hundred two parking spaces, plus one parking space for each additional two bedrooms or any other room that can be used for sleeping purposes. Restaurant and meeting facilities shall be provided with additional parking spaces as required for each respective use.
- Markets: Food and Liquor Stores. One space for each one hundred fifty square feet of gross floor area.
- Restaurants, Bars and Cafes. One parking space for each one hundred fifty square feet of gross floor area.
- Service Shops (printing, cleaning, repair and the like). One parking space for each three hundred square feet of gross floor area.
- Shopping Centers (commercial multiple tenant facilities where parking is not determined by the respective requirements of each individual tenant). For centers larger than

fourteen thousand square feet in floor area: sixty parking spaces, plus one additional parking space for each additional four hundred square feet of gross floor area in excess of fourteen thousand square feet of floor area.

- Theaters. One parking space for each five fixed seats or each thirty-five square feet of floor area (exclusive of halls, stairs, lobby, theater offices or restrooms).
- Card Clubs. One parking space for each fifty square feet of gross floor area, excluding kitchens, for facilities not exceeding twenty-five thousand square feet in area; and one parking space for each seventy-five square feet of gross floor area for any floor area in excess of twenty-five thousand square feet.

Civic Parking Requirements

The Inglewood Municipal Code does not provide a general parking standard for “civic uses,” but instead, the parking requirement is particular to specific civic uses. Under IMC Section 12-46(6) the parking requirements for public libraries, parks and other public facilities other than public office space are to be determined by the Planning Commission pursuant to Section 12-48 of the IMC, which requires the Planning Commission to determine the parking requirement, and by resolution, set forth its findings and reasons for making the determination. For an elementary school, Section 12-46(2)(a) provides that the aggregate amount of off-street parking provided in connection with an elementary school is two parking spaces plus either 1.5 parking spaces per classroom, or one parking space for each 400 square feet of total floor area in classrooms, assembly rooms or other instructional facilities, whichever is greater.

The IMC also contains a “catchall” category for uses not specified within the code. As provided in Section 12-48, when the parking requirements for a use are not specifically set forth, the parking space requirements for such use may be determined by the Planning and Building Department Director, using as a guide the most comparable use specified herein. If the Director is unable to make a determination, the Planning Commission shall determine that parking requirement and, by resolution, set forth its findings and reasons for making said determination.

Existing Conditions

The Hollywood Park Racetrack and Casino site has surface parking located throughout the site area, which is used for activities associated with the racetrack and the casino/card club. There are no parking structures currently located on the site.

ENVIRONMENTAL IMPACTS

~~The parking requirements for the Mixed Use zone of the Project (including guest/visitor parking required for residential units that could be built in the Mixed Use zone) are proposed to utilize a shared parking~~

methodology. The residential zone parking for the Project will be separate from the Mixed Use zone and will not use a shared parking methodology. Rather, the residential parking provided will be similar to the requirements under the Inglewood Municipal Code, with some modifications.

Shared Parking Methodology

Off street parking requirements found in many municipal codes, including the City of Inglewood, are developed for stand alone residential or commercial uses without consideration for the possibility of shared parking with surrounding land uses. Shared parking is the use of a parking space to serve two or more individual land uses without conflict or encroachment. The ability to share parking spaces is the result of two conditions:

1. Variations in the accumulation of vehicles by hour, by day, or by season at the individual land uses, and
2. Relationships among the land uses that result in visiting multiple land uses on the same auto trip.

The key goal of a shared parking analysis is to find the balance between providing adequate parking to support a development from a commercial standpoint while minimizing the negative aspects of excessive land area or resources being devoted to parking.

One of the most popular real estate trends is known as “place making,” the development of town centers and urban villages with mixed uses in pedestrian friendly settings. Another significant trend today is locating development consistent with established transit corridors and bus lines. With housing located within walking distance, or a short bus ride from light rail transit, some trips and, in turn, some parking spaces can be eliminated. These trends reduce the amount of required parking.

The Urban Land Institute (“ULI”) and the Institute of Transportation Engineers (“ITE”) have released publications that list parking ratios for many types and subtypes of land uses. The Urban Land Institute first published *Shared Parking* in 1983. This publication has been used ever since to explain the concept of shared parking and to create models that forecast peak parking conditions for mixed use developments, and/or urban settings. Walker Parking Consultants contributed to that original publication and also led the team that researched and wrote *Shared Parking, 2nd Edition*, published in 2005. ULI also provides case studies within Chapter 5 of the *Shared Parking* publication. These case studies perform a shared parking analysis on existing sites throughout the United States to support the theory of shared parking and the methodology developed by ULI to forecast future parking demands in a shared parking environment and they validate the use of shared parking to reduce otherwise applicable parking standards. The sites in the study include: the Puente Hills Mall, Fashion Island (Newport Beach), Veteran Plaza (Tampa, FL), Long Beach Towne Center, Covina Town Square, Burbank Empire, Westfield Promenade (Woodland Hills), Ahwatukee Foothills Towne Center (Phoenix, AZ), Irvine Spectrum, Reston Town Center (Reston,

VA), Easton Town Center (Columbus, OH), Block at Orange, and the Village Glen Plaza (Westlake Village, CA). The specific shared parking methodology that was utilized to estimate the Proposed Project's peak parking demand is discussed in further detail under Project Impacts subheading below.

Methodology

The parking requirements in the Hollywood Park Specific Plan are based upon the parking demands created by the mix of each land use on the Project Site, or in the case of residential units, based upon estimated parking demand for each product type. Specifically, the Specific Plan contains separate parking standards for the retail/entertainment center in the Mixed-Use Zone, the residential dwelling units in the Residential Zone, and civic use in the Civic Zone. The Specific Plan calculation takes into account such factors as a shared parking analysis for parking in the Mixed-Use Zone of the Project, and the parking requirements for dwelling units in the Residential Zone based upon the ratios (tied to bedroom counts) provided in the Hollywood Park Specific Plan, which in turn are based upon demonstrated parking requirements for similar products.

The analysis of parking impacts includes calculations of the Project's parking requirements as provided by the Hollywood Park Specific Plan. For a reference and comparison, a calculation of the number of parking spaces that would be required pursuant to the Inglewood Municipal Code is included.

Thresholds of Significance

A-In accordance with Appendix G to the State's CEQA Guidelines a project would normally have a significant impact on the environment if it would result in inadequate parking if the project provides less parking than required by the City's development standards, or less parking than needed as determined through an analysis of demand from the project capacity. Based on this guidance, the Proposed Project would result in a significant impact on parking if the number of parking spaces required to accommodate Project activities exceeds the number of parking spaces provided. project provides less parking than needed as determined through an analysis of demand from the project.

Project Impacts

Construction

There would be no adverse impacts to existing street parking bordering the Project Site during construction. Due to the large size of the Project Site, construction workers will park in designated areas on the Project Site. During the grading and excavation phase of the Proposed Project, while Casino operations are still active, temporary parking areas will be created adjacent to the Casino for its patrons. Once grading/excavation work is complete adjacent to the Casino site, permanent parking areas will be designated during the construction phase of the Proposed Project. Adequate parking spaces will be

maintained throughout grading/excavation and construction, therefore, impacts due to construction will be less than significant.

Operation

Mixed Use Zone Parking Requirement

Parking for the commercial, entertainment, hotel and retail land uses will be provided with a combination of surface parking lots, structured parking lots and on-street parking spaces within the designated mixed-use land use plan area (the "Mixed Use zone") pursuant to the requirements and standards established in the Hollywood Park Specific Plan. Parking in the Mixed Use zone will be provided on a shared basis, based upon the mix of uses and estimated parking demands. The details of the shared parking methodology are discussed later in this section.

With respect to the structured parking lots[†] to meet the Proposed Project's demand, as shown on the Conceptual Circulation Plan in Figure II-8, Parking Structure 1 ("P1") may contain up to approximately 2,199 stalls. Parking Structure 2 ("P2") may contain up to approximately 1,121 stalls. The Casino Garage ("P3") may contain up to approximately 2,005 stalls. Parking Structure 4 ("P4") may contain up to approximately 1,883 spaces. Parking Structure 5 ("P5") may contain up to approximately 570 parking stalls. In total, the Mixed Use zone could contain parking structures and lots that could provide up to 7,778 parking spaces. However, it is anticipated that less parking will actually be demanded by the commercial, entertainment, hotel and retail land uses. The ultimate number of parking spaces developed will depend upon the land uses built and will be determined at the time of Plot Plan Review as provided in the Hollywood Park Specific Plan. This parking is separate and independent of the residential parking for residential units outside the Mixed Use zone.

Each of the parking garage structures will be developed as open-air parking structures with 42" high spandrel walls to block light trespass from vehicle headlights. Parking Structure sizes may be increased as much as twenty percent to reflect actual parking demand adjacent to the location of the structure.

Residential Parking Requirement

Residential parking (including guest parking) will be located within the residential land use areas, and in the Mixed Use Zone to the extent residential units are located there.

Pursuant to the Hollywood Park Specific Plan, the minimum number of off-street parking spaces required

[†] Individual parking structures will be constructed on an as-needed basis to meet the shared parking demands of the proposed mixed-use development. It is anticipated that the actual parking demand identified herein may vary by up to 20% at different stages of buildout based on the shared parking demand analysis model to be established in the Specific Plan. Consequently, the size of each individual structure may vary to reflect parking demand. For purposes of a worst-case air quality and noise analysis, this Draft EIR assumes each structure could be as large and as tall as possible.

for resident parking in the residential zone are: (1) two spaces for the Single Family Housing Type, (2) 1.5 spaces for studio and one bedroom units for Townhome and Wrap/Podium Housing Types, and (3) two spaces for units with 2 or more bedrooms for the Townhome and Wrap/Podium Housing Types. With respect to guest/visitor parking within the residential zone, the Hollywood Park Specific Plan provides one guest/visitor space for three dwelling units, except that single family homes on 3,500 sf lots shall have one guest/visitor spaces per dwelling unit. These spaces may be located within a parking structure, parking lot or on street.

Pursuant to the Hollywood Park Specific Plan, studio and 1 bedroom units in the Mixed Use zone shall have 1.5 spaces per unit, and units with 2 or more bedrooms shall have 2 spaces per unit. Residential parking for each unit within the Mixed Use zone would be cordoned off from commercial parking areas to provide controlled access for residents for security purposes. The minimum number of guest/visitor spaces for residential units in the Mixed Use zone will be determined by the shared parking analysis.

Parking for residential dwelling units may utilize on street or tandem parking, and guest/visitor parking may utilize on street parking, although no street parking will be provided on major arterial streets (Century Boulevard and Prairie Avenue) adjacent to the Project Site. However, some new streets created within the Proposed Project can accommodate on street parking. Figure IV.M-1, Permitted Street Parking, identifies internal roadways located within the Proposed Project that can accommodate on street parking. The specific location and number of on street parking spaces would be dependent upon final design and approval of subdivision maps where location of driveways, fire hydrants and other infrastructure details are taken into consideration. Furthermore, convenient short term street parking would be made available adjacent to the Proposed Project's retail and community serving uses.

Depending upon the actual bedroom counts that are developed in the residential dwelling units, it is estimated that the Project Site could contain up to approximately 7,700 parking spaces in the residentially zoned areas of the Project Site to accommodate the parking demand generated by residents on the Project Site. This includes up to approximately 6,000 required resident parking spaces (typically in garages), 700 on site parking spaces, and 1,000 on street parking spaces. These parking spaces are created in the residentially zoned areas of the Project Site and are in addition to the number of spaces created for the retail, commercial, entertainment, casino, residential, and hotel land uses as described above in "Mixed Use Zone Parking Requirements." Again, it should be noted that the precise number of resident and guest spaces for the residential units and the location of these spaces will be determined at the time of Plot Plan Review per the requirements of the Development Standards in the Hollywood Park Specific Plan. The Specific Plan's parking standards are designed to meet the parking demand generated by the housing product types proposed for the Project, which tend to generate a smaller number of residents due to the size of the units and the bedroom counts. As a result, the project's parking demands for the residential land uses would be met and impacts would be less than significant.

Civic Zone Parking Requirement

The precise number of parking for the 4 acre civic site will be determined at the time of Plot Plan Review and will depend upon the ultimate use selected for the site.

City of Inglewood Municipal Code

The City of Inglewood does not have any parking requirements that apply to large mixed-use communities such as the proposed Hollywood Park Project. Because the Proposed Project involves a town center or urban village type development with mixed uses and pedestrian-friendly walkability standards, the application of the City's parking code requirements for the proposed mixed-use retail plan area would result in an oversupply of parking. Nevertheless the City of Inglewood's parking requirements for the stand-alone land uses that are proposed as part of the Hollywood Park Redevelopment project are provided in Table IV.M-1, below.

Although the project results in less than significant impacts, a mitigation measure was included to address parking during the construction phase of the project.

Operation

Development within the Proposed Project is bounded by Century Boulevard on the south, Prairie Avenue to the west, Arbor Vitae to the north and the Marketplace/Renaissance/Darby Park to the east.

Inglewood Municipal Code

The City of Inglewood does not have any parking requirements that apply to large mixed-use communities such as the proposed Hollywood Park Project. Instead, the parking standards in the IMC are based upon ratios for stand-alone land uses. Because the Proposed Project involves a town center or urban village type development with mixed uses and pedestrian-friendly walkability standards, the application of the City's parking code requirements for the proposed mixed-use retail plan area would result in an oversupply of parking because it does not take into account synergies that can be achieved with a master-planned, mixed-use development. As indicated by Table IV.M-1, if the parking standards in the Inglewood Municipal Code are used, the sample mix of uses proposed to be developed under the Proposed Project would require approximately 6,988 parking spaces for residential uses in the Residential Zone and 5,209 spaces for non-residential uses in the Mixed-Use Zone. (The final mix of uses would determine the amount of code required parking). However, the Project's mix of uses would offer shared parking efficiencies as different non-residential uses vary in terms of the times of day when their respective parking demands would be expected to peak. Section 2.11.3 of the Specific Plan sets forth the provisions of Shared Parking.

**Table IV.M-1
City of Inglewood Parking Requirements**

Land Use	Size (sq. ft./units)	Parking Requirements	Minimum Requirement
Residential^a			
Dwelling Units	2,995 DU	2/DwellingUnit	5,990
Guest ^b	2,995 DU	1/3 Units	998
Subtotal Residential			6,988
Mixed-Use Program			
Retail	468,400	60+ 1/400 SF GFA in excess of 14,000 GFA	1, 231
Restaurant (Sit Down) ^e	49,100	1/150 SF GFA	327
Restaurant (Fast Food) ^e	42,500	1/300 SF GFA	142
Cinema	60,000 3,000 seats	1/5 Seats or 1/35 SF GFA in theaters	600
Casino	120,000	1/75 SF GFA	1,600
Office	75,000	1/300 SF GFA	250
HOA Facility	10,000	1/5 Seats or 1/35 SF GFA in seating area	286
Hotel (rooms)	210,000 (300 rooms)	102 for first 100 rooms plus 1 per 2 rooms over 100	202
Hotel (Meeting Space)	20,000	1/5 Seats or 1/35 SF GFA in seating area	571
Subtotal Mixed-Use			5,209
<i>Notes:</i>			
^a Includes the parking requirements for any multiple family residential units that may be located within the mixed-use plan area.			
^b Assumes that all units are multiple family.			
^e Assumes that all units are multiple family.			
Source: City of Inglewood Municipal Code, WMS, 2007, Walker Parking, 2007.			

Based on the code requirements for the residential land uses, it is roughly estimated approximately 6,988 parking spaces will be required to serve the residential land uses, including residential guest parking requirements. The Specific Plan requirements would be comparable, but would also permit the use of tandem and on-street parking for some required spaces. The actual number of residential parking spaces will be determined on the number and type of dwelling units developed and the actual bedroom counts for the units developed. Resident and guest parking will be provided pursuant to the development standards of the proposed Specific Plan. As shown in Table IV.M-1, the application of the code required parking standards for the mixed-use portion of the Proposed Project would yield a requirement of approximately 5,209 parking spaces. This estimate—The estimate provided in Table IV.M-1 for comparative purposes is based on a rough approximation of the retail shopping center and retail characteristics provided by the Project Applicant as a sample development scenario. It should be noted, however, that the actual size and characteristics of the proposed retail plan is anticipated to vary depending on market forces and the procurement of individual tenant occupancies. The Specific Plan allows for a wide variety of commercial uses in the Mixed-Use Zone, and their parking requirements will ultimately depend on the parking demand characteristics of a particular use. Therefore, the parking requirements identified in Table IV.M-1 are provided for general comparative purposes given that the sample provides only one of the various possible development scenarios.

Shared Demand-Hollywood Park Specific Plan Parking Standards**Mixed-Use Zone Parking Requirement**

The parking requirements for the Mixed-Use zone of the Project (including guest/visitor parking required for residential units that could be built in the Mixed-Use zone) are proposed to utilize a shared parking methodology. Off-street parking requirements found in many municipal codes, including the City of Inglewood, are developed for stand alone residential or commercial uses without consideration for the possibility of shared parking with surrounding land uses. Shared parking is the use of a parking space to serve two or more individual land uses without conflict or encroachment. The ability to share parking spaces is the result of two conditions:

1. Variations in the accumulation of vehicles by hour, by day, or by season at the individual land uses, and
2. Relationships among the land uses that result in visiting multiple land uses on the same auto trip.

The key goal of a shared parking analysis is to find the balance between providing adequate parking to support a development from a commercial standpoint while minimizing the negative aspects of excessive land area or resources being devoted to parking.

The Urban Land Institute (“ULI”) and the Institute of Transportation Engineers (“ITE”) have released publications that list parking ratios for many types and subtypes of land uses. The Urban Land Institute first published Shared Parking in 1983. This publication has been used ever since to explain the concept of shared parking and to create models that forecast peak parking conditions for mixed-use developments, and/or urban settings. Walker Parking Consultants contributed to that original publication and also led the team that researched and wrote Shared Parking, 2nd Edition, published in 2005.

Based on a review of ~~several case studies~~ available data for parking requirements for mixed-use projects that are of a similar scale and characteristics to the Hollywood Park Project, the code required parking calculation presented above would result in an overdevelopment of the actual parking supply for the Proposed Project. For this reason, the Specific Plan proposes that as part of the Plot Plan review for the Project, the Project Applicant will provide a shared parking analysis for the Proposed Project based upon the actual quantity and type of land uses to be developed. A preliminary shared parking analysis for the Proposed Project was prepared utilizing the most up-to-date information from the second edition of *Shared Parking*. Data specific to the City of Inglewood and the location of Hollywood Park have been entered into the model, and site and market specific variations taken into consideration to arrive at the number of parking spaces required to serve the development. The shared parking summary provided in this section is an example of a prototypical program for the Mixed-Use zone. Actual program information, including types of land uses and quantity of land uses, would be included as part of the Plot

Plan for the Mixed-Use zone once the exact nature of the types of tenants is known. The land uses and quantities contained in the tables below are, therefore, not the precise program. However, the methodology used to derive the parking demand for this “sample program” would be similar to the methodology used for the shared parking demand analysis that will be submitted as part of the Plot Plan package. Refer to the updated Shared Parking Analysis (dated February 9, 2009) included as Appendix L to the Final EIR for further details on the shared parking methodology.

Step 1—Project Data

~~The preliminary analysis was based on the quantity of square footages for the retail, restaurant, quick-serve restaurant, office and meeting space, cinema seat count, casino historic data, and the guest parking for residential units (if applicable). The shared analysis does not consider the parking supply set aside for Hollywood Park single family, condominium and townhome residents, located in the residential land use zone, or the parking demand that they generate.~~

~~Other project data that has been considered includes:~~

- ~~• The site is currently along two major arterials that offer bus service.~~
- ~~• Modal split for employees ranges from 80% to 90% based on mode of transportation to work data for Inglewood paired with professional judgment for each land use type.~~
- ~~• The overall redevelopment will include roughly 3,000 residential units providing a large captive demand for the retail, residential, grocery, and cinema on site.~~
- ~~• The parking supply for the mixed use residential units will be fenced off through the use of access control equipment and will be reserved on a space by space basis.~~
- ~~• Valet service may be provided in locations near the retail/restaurant core, and the entrance of the Casino.~~
- ~~• The project applicant intends to provide free parking initially, but has set up curb cuts, etc. for the future placement of access control equipment and cashiers.~~

Step 2—Select Parking Ratios

~~The parking ratios that project the peak parking demand for Hollywood Park were derived from ULI. The ULI ratios are based on occupancy counts from stand alone land uses throughout the U.S. (updated in 2005). The ULI ratios also draw a distinction between employees (long term parkers) and visitors or patrons (short term parkers). Most land uses also generate different parking demands on weekends than weekdays, so ULI has identified different parking demand ratios for each.~~

Step 3—Select Factors & Analyze Patterns

For both weekdays and weekend days ULI also provides adjustment factors for each hour of the day. These factors are based on 100% being the peak parking required by that land use. Any land use may reach 100% at more than one point during the day. The shared parking methodology works when the square footages for all land uses are combined with the parking ratios and these hourly factors. Any given land use may generate a large amount of parking at its peak hour while another generates at only 20% during that time.

Step 4 – Critical Needs Periods

The critical needs periods are driven in general from the largest quantity of land use or the largest parking requirement before any reductions are made. In that case the model adjusts to the retail or casino activity at the site. The parking ratio was developed through study of the existing casino. Casino activity peaks at 2:00 p.m. based on the Off Track Betting function of the site, it then drops off for several hours until the Card Club picks up. Retail activity peaks from 2:00 p.m. to 3:00 p.m. on the weekends, tying in with the casino peak period. Although restaurant parking demand peaks in the evening, the peaks for casino and retail pull the overall demand away from the evening (dinner) restaurant peak. Based on the ULI model the peak hour parking occurs at 2:00 p.m. on a weekend in late December. Parking will again be impacted at 6:00 p.m. on weekends when the cinema picks up and retail and restaurant are still generating significant activity.

Step 5 – Modal Split Adjustment

Modal split is the adjustment that accounts for modes of transportation that a user group would likely use other than single occupant vehicles such as rail, bus, carpooling, walking etc. Data for the City of Inglewood was found on the U.S. Census website. Data from 2000 indicated that roughly 80% of workers drove alone, and roughly 10% carpooled. These are the only two modes of transportation that would generate parking on-site. Because a carpool consists of at least two persons, that land use demand only generates half as many vehicles, or 5%. When combined we find a modal split of 85% of employees arriving by cars. This split is reasonable because of site and market specific considerations including proximity to transit, transit ridership statistics, and proximity to a large number of residential units.

Step 6 – Noncaptive Adjustment

A non captive adjustment accounts for a parking reduction for users of the site already parked and accounted for by one land use utilizing another land use on site. For Hollywood Park, employees of the office building may choose to take lunch in one of the restaurants on site, thus generating no additional parking demand. Alternatively a resident of Hollywood Park may be employed by one of the businesses on the site. These adjustments are specific to the site. This factor is applied in a judicious manner so not to create a parking shortfall. Recognizing that any development without adequate parking may not generate business to its potential, the non captive reduction was lessened to assure adequate parking.

Step 7—Required Parking

Using the information supplied, information gathered, and appropriate adjustments for this development and the surrounding area, Walker calculated the shared peak parking demand. Tables IV.M-2 and IV.M-3 show the weekday and weekend shared peak parking demand for all user groups and land uses on site other than condominium and townhome residents. Based on the findings in Table IV.M-2 and Table IV.M-3, the Proposed Project would need to supply 4,922± parking spaces (weekend peak) in the shared lot/garage, and an additional 404 controlled parking spaces for the condominiums and townhomes in the mixed use plan area. Under the program data supplied and the parking management scenario provided by the Project Applicant, Walker found that a total of 5,326± parking spaces would be needed to sufficiently supply parking at the peak period.

Step 8—Critical Needs / Management Concerns

Currently the critical needs period is based on weekend, daytime demand generated by the casino and retail on site. Two potential tenants may have a concern about how sharing parking with other land uses will affect the parking available for their patrons. These two uses are cinema and grocery. Based on modal split and non-captive adjustments Walker found a peak parking demand for the cinema of 691 and for the grocery store of 208.² The proximate supply proposed for both of these land uses will be more than adequate to accommodate their parking demand at their peak periods.

² The peak periods for all months and from 6:00 a.m. to 12:00 a.m. for the peak month are provided in Appendix B to the Walker Parking Study. The Walker Parking Demand Analysis is provided in Appendix G-2 to this Draft EIR.

Table IV.M-2
Shared Parking Demand—Overall Peak Weekday
Sample Program Tenant Mix

Hollywood Park Land Use/User Group	Quantity	Weekdays Base Ratio/Unit	Month Adj. Late Dec.	Pk Hr Adj. 2:00 P.M.	Non Captive Daytime	Drive Ratio Daytime	Late Dec. 2:00 P.M.
Community Shopping Ctr	339,380	2.90 / ksf GLA	80%	100%	95%	90%	673
–Employee		0.70	90%	100%	97%	80%	166
Fine /Casual Dining	49,100	15.25 / ksf GLA	95%	65%	97%	95%	426
–Employee		2.75	100%	90%	97%	85%	100
Quick Serve Restaurant	42,500	12.75 / ksf GLA	95%	90%	50%	90%	209
–Employee		2.25	100%	95%	95%	80%	69
Cineplex	3,000	0.19 / seat	100%	75%	95%	90%	366
–Employee		0.01	100%	60%	100%	80%	14
Hotel	300	0.90 / room	100%	70%	100%	100%	189
Hotel Meeting/Banquet	20,000	30.0 / ksf GLA	100%	65%	60%	75%	176
–Employee	300	0.25 / room	100%	100%	100%	80%	60
Community Room ^a	5,000	30.00 GLA	100%	65%	60%	75%	44
–Residential Guest	202	0.15 / unit	100%	20%	100%	97%	6
Office (25k to 100k sq-ft.)	75,000	0.30 / ksf GFA	80%	100%	100%	100%	18
–Employee		3.27	80%	100%	95%	95%	177
Grocery	53,200	4.00 GLA	100%	95%	85%	90%	155
–Employee		0.70	100%	100%	95%	80%	28
Casino	120,000	10.94 GLA	100%	79%	100%	100%	1035
–Employee		2.79	100%	93%	100%	85%	264
Market Square	75,820	3.20 GLA	100%	100%	100%	85%	207
–Employee		0.80	100%	100%	100%	80%	49
Subtotal Customer/Guest Spaces							3,315
Subtotal Employee/Resident Spaces							—867
Total Parking Spaces							4,182
Percent Reduction							40%
<p><i>Note: The sample program above assumes a maximum of 202 residential units in the Mixed Use Zone area, typically over the retail uses. As such, these units would generate parking demand in addition to this total of 4,182. If all of the 202 units were two bedroom units, an additional demand of 404 spaces (202 X 2 spaces per unit) would be required, bringing the total spaces to 4,586 (4,182+404).</i></p> <p>^a For purposes of the Shared parking demand analysis Walker Consultants assumed 5,000 square feet of the HOA Community Room would be occupied floor area.</p> <p>Source: Walker Parking Consultants, 2007.</p>							

**Table IV.M-3
Shared Parking Demand—Overall Peak Weekend
Sample Program Tenant Mix**

Hollywood Park Land Use/User Group	Quantity	Weekends Base Ratio/Unit	Month Adj. Late Dec.	Pk Hr Adj. 6:00 P.M.	Non Captive Evening	Drive Ratio Evening	Late Dec. 6:00 P.M.
Community Shopping Ctr	339,380	3.20 / ksf GLA	80%	80%	95%	90%	594
-Employee		0.80	90%	85%	97%	80%	161
Fine /Casual Dining	49,100	17.00 / ksf GLA	95%	90%	95%	95%	644
-Employee		3.00	100%	100%	97%	85%	121
Quick Serve Restaurant	42,500	12.00 / ksf GLA	95%	85%	50%	90%	185
-Employee		2.00	100%	90%	95%	80%	58
Cineplex	3,000	0.26 / seat	100%	70%	95%	95%	493
-Employee		0.01	100%	100%	100%	80%	24
Hotel	300	1.00 / room	100%	85%	100%	100%	255
Hotel Meeting/Banquet	20,000	30.0 / ksf GLA	100%	100%	70%	75%	315
-Employee	300	0.18 / room	100%	60%	100%	80%	26
Community Room ^a	5,000	30.00 GLA	100%	100%	70%	75%	79
-Residential Guest	202	0.15 / unit	100%	60%	100%	100%	18
Office (25k to 100k sq. ft.)	75,000	0.03 / ksf GFA	80%	5%	100%	100%	0
-Employee		3.33	80%	5%	95%	95%	1
Grocery	53,200	4.30 GLA	100%	80%	85%	90%	140
-Employee		0.80	100%	85%	95%	80%	28
Casino	120,000	12.03 GLA	100%	89%	100%	100%	1,279
-Employee		2.71	100%	87%	100%	90%	255
Market Square	75,820	3.60 GLA	100%	80%	100%	90%	197
-Employee		0.90	100%	85%	100%	85%	49
Subtotal Customer/Guest Spaces							4,199
Subtotal Employee/Resident Spaces							<u>723</u>
Total Parking Spaces							4,922
Percent Reduction							32%
<p><i>Note: The sample program above assumes a maximum of 202 residential units in the Mixed Use Zone area, typically over the retail uses. As such, these units would generate parking demand in addition to this total of 4,182. If all of the 202 units were two bedroom units, an additional demand of 404 spaces (202 X 2 spaces per unit) would be required, bringing the total spaces to 5,326 (4,922+404).</i></p> <p>^a -For purposes of the Shared parking demand analysis Walker Consultants assumed 5,000 square feet of the HOA Community Room would be occupied floor area.</p> <p>Source: Walker Parking Consultants, 2007.</p>							

Walker was asked to provide the Project Applicant with additional information concerning how the peak hour found through our analysis compares to other time periods throughout the day and year. Data utilized for this analysis can be found in Appendix B to the Shared Parking Study contained in Appendix

G-2 to this EIR. The overall shared parking could be reduced by roughly 100 spaces while only causing a projected shortfall in December and late December, and for only 2:00 p.m., 6:00 p.m. and 7:00 p.m. This shortfall could possibly be alleviated through the use of stacking vehicles utilizing valet parking. There is also the possibility that over time visitors to the site will begin to adjust to the site and utilize the available transit without affecting the vitality of the development.

Based on the sample program provided, the shared parking analysis projects a total demand of 5,326± parking spaces to sufficiently supply parking in the Mixed Use zone at the peak period.

As part of the Plot Plan Review Process, an analysis of driveways in the Mixed Use zone would be provided to ensure that adequate vehicle queuing area would be provided to accommodate the anticipated demand. Additionally, vehicle queuing within the City's right of way is not anticipated to occur during peak hours due to the design of the Project's Circulation Plan. Therefore, impacts due to vehicle queuing would be less than significant.

Through the parking requirements to be established in the Specific Plan

As shown in Table IV.M-2, with shared parking, the highest demand for the Mixed-Use Zone is for weekend peak demand and is estimated to be 4,857 spaces. The application of shared parking for office, retail, restaurant, casino uses results in a demand for total non-residential parking spaces that is less than the required parking under the Inglewood Municipal Code for the individual uses. As discussed above, this result is attributed to the parking efficiencies that can be gained when using a shared parking methodology.

Table IV.M-2
Shared Parking Demand for Mixed-Use Zone

PROJECT—Mixed-Use Zone			
	AREA	Shared Parking Methodology	
		Ratio¹	Spaces
<u>Retail</u>	<u>468,400 SF</u>	=	<u>1,043</u>
<u>Restaurants</u>	<u>49,100 SF</u>	=	<u>765</u>
<u>QSR "Take Out" Restaurants</u>	<u>42,500 SF</u>	=	<u>243</u>
<u>Cinema</u>	<u>3,000 SEATS</u>	=	<u>517</u>
<u>SUBTOTAL</u>	<u>620,000 SF</u>	=	<u>2,568</u>
<u>Casino</u>	<u>120,000 SF</u>	=	<u>1,534</u>
<u>Office</u>	<u>75,000 SF</u>	=	<u>1</u>
<u>Community Room²</u>	<u>10,000 SF</u>	=	<u>158</u>
<u>Hotel</u>	<u>300 ROOMS</u>	=	<u>281</u>
<u>Banquet/Meeting Space</u>	<u>20,000 SF</u>	=	<u>315</u>
<u>Total Parking Required</u>	=	=	<u>4,857</u>

¹ Shared Parking demand factors are found in Shared Parking Study, February 9, 2009 in Appendix G-2.

Valet service has not been factored in to the shared parking demand analysis, nor is it anticipated to be utilized as a means to provide code required parking. Valet parking is only anticipated to be utilized within the Mixed-Use Zone of the Hollywood Park Specific Plan area as an additional service for visitors to the project or to respond to unique, extraordinary or unanticipated project conditions. For example, valet parking could be used at some of the restaurants in the Mixed-Use Zone as is customary. Additionally, valet service could also be utilized to alleviate possible shortfalls in parking during peak periods, such as busy weekends during the holiday season. The Shared Parking analysis does not factor in valet parking, and thus the benefits of the potential use of valet parking is not reflected in the parking sufficiency assessment. Valet parking has the potential to increase the total number of parking spaces by maximizing utilization of the parking areas. Thus, the shared parking analysis presents a more conservative assessment of the impacts of the Project on parking.

ULI provides case studies within Chapter 5 of the Shared Parking publication. These case studies support the theory of shared parking and the methodology developed by ULI to forecast future parking demands in a shared parking environment and they validate the use of shared parking to reduce otherwise applicable parking standards. The sites in the study include: the Puente Hills Mall, Fashion Island (Newport Beach), Veteran Plaza (Tampa, FL), Long Beach Towne Center, Covina Town Square, Burbank Empire, Westfield Promenade (Woodland Hills), Ahwatukee Foothills Towne Center (Phoenix, AZ), Irvine Spectrum, Reston Town Center (Reston, VA), Easton Town Center (Columbus, OH), Block at Orange, and the Village Glen Plaza (Westlake Village, CA). The specific shared parking methodology that was utilized to estimate the Proposed Project's peak parking demand is discussed in further detail under Project Impacts subheading below.

Residential Zone Parking Requirement

Required residential parking (including guest parking) will be located within the residential land use areas, and in the Mixed-Use Zone to the extent residential units are located there.

Pursuant to the Hollywood Park Specific Plan, and as shown in Table IV.M-3, Residential Zone Parking Requirement, the minimum number of off-street parking spaces required for resident parking in the residential zone are: (1) two spaces for the Single-Family Housing Type, (2) 1.5 spaces for studio and one-bedroom units for Townhome and Wrap/Podium Housing Types, and (3) two spaces for units with 2 or more bedrooms for the Townhome and Wrap/Podium Housing Types. With respect to guest/visitor parking within the residential zone, single-family homes on 3,500 sf lots shall have one guest/visitor spaces per dwelling unit. All other units within the Residential Zone shall have 1 guest/visitor space for 6 units provided off-street in a garage or in a parking lot or an on-site parking area, and another 1 guest/visitor space for 6 units must be provided either off-street, or by utilizing public street parking, or a combination of off-street and public street parking, for a total requirement of 1 guest/visitor parking space per 3 units. If public street parking is utilized to satisfy a portion of the guest/visitor parking, at no point shall the total number of public street spaces so utilized exceed 50% of the total number of then available public street spaces.

Table IV.M-3
Residential Zone Parking Requirement

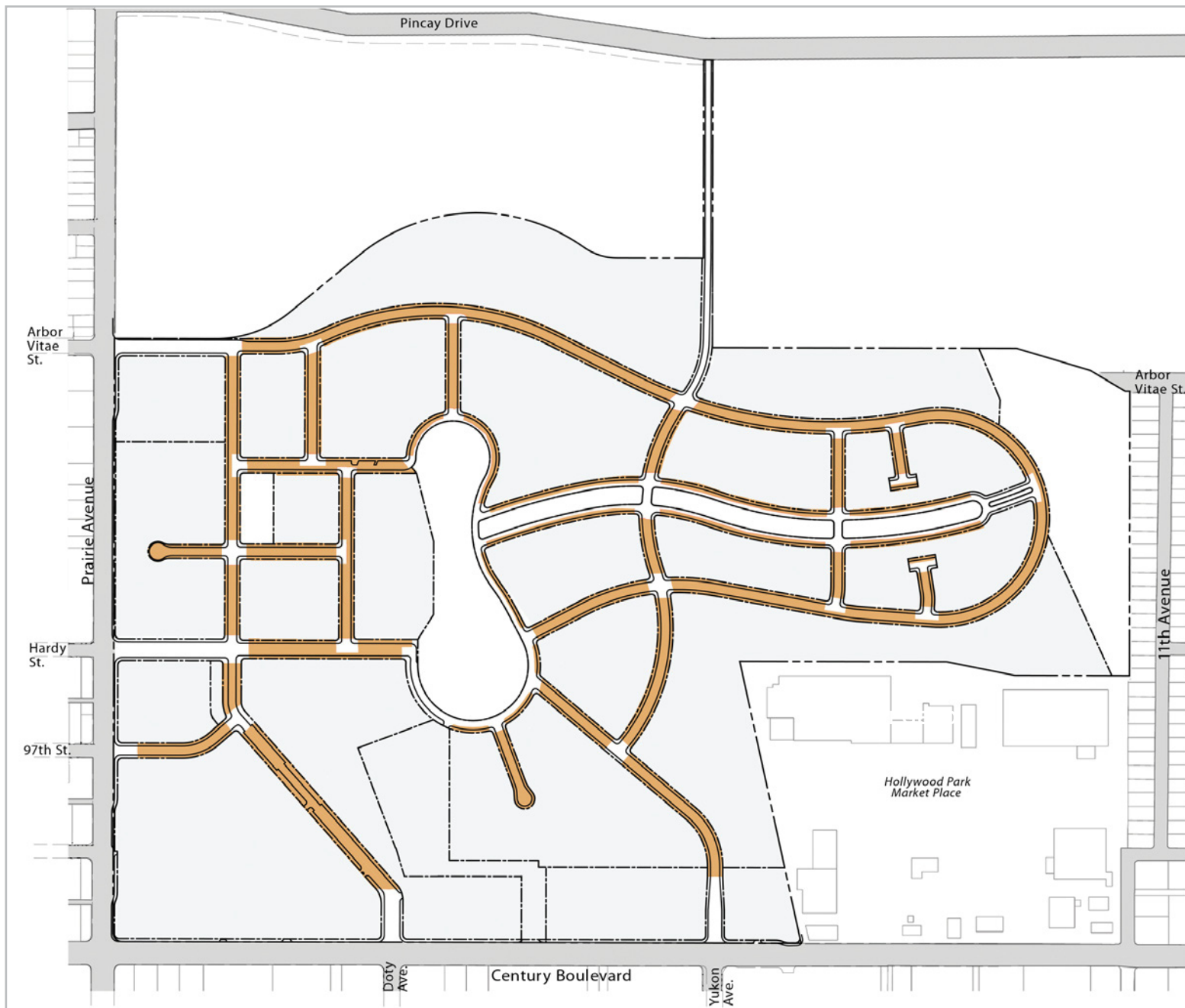
<u>Hollywood Park Specific Plan</u>	<u>Required Resident Parking³</u>	<u>Guest Parking</u>	<u>Tandem Parking</u>
<u>Single-Family Housing Type</u>	<u>2 enclosed spaces/unit</u>	<u>1 space/unit¹</u> <u>1 space/6 units (off-street)</u> <u>& 1 space/6 units (on-street, off-street, or combination)²</u>	<u>Not allowed</u>
<u>Townhome Housing Type</u>	<u>1.5 covered spaces/1 bedroom unit</u> <u>2 covered spaces/2+ bedroom unit (1 enclosed)</u>	<u>1 space/6 units (off-street)</u> <u>& 1 space/6 units (on-street, off-street, or combination)²</u>	<u>Allowed to count towards meeting requirement</u>
<u>Wrap/Podium Housing Type</u>	<u>1.5 covered spaces/1 bedroom unit</u> <u>2 covered spaces/2+ bedroom unit (1 enclosed)</u>	<u>1 space/6 units (off-street)</u> <u>& 1 space/6 units (on-street, off-street, or combination)²</u>	<u>Allowed to count towards meeting requirement</u>

¹ For single family homes, on 3,500 SF lots
² These units within the Residential Zone shall have 1 guest/visitor space for 6 units provided off-street in a garage or in a parking lot or an on-site parking area, and another 1 guest/visitor space for 6 units must be provided either off-street, or by utilizing public street parking, or a combination of off-street and public street parking, for a total requirement of 1 guest/visitor parking space per 3 units.
³ As provided in the Hollywood Park Specific Plan, parking for residents for all Housing Types, with the exception of Housing located within the Mixed-Use Zone, shall be 400' from the parking area to the entrance of the unit or lobby. For Housing located in the Mixed-Use Zone, parking spaces shall be 600' from parking to entrance of unit or lobby.

Required resident parking may utilize tandem parking, located within individual garages or wrap/podium garages. Guest/visitor parking may utilize on-street parking, although no street parking will be provided on major arterial streets (Century Boulevard and Prairie Avenue) adjacent to the Project Site. New streets created within the Proposed Project can accommodate on-street parking. Figure IV.M-1, Permitted Street Parking, identifies internal roadways located within the Proposed Project that can accommodate on-street parking. The specific location and number of on-street parking spaces would be dependent upon final design and approval of subdivision maps where location of driveways, fire hydrants and other infrastructure details are taken into consideration.

It is estimated that the Project Site could contain up to approximately 7,700 parking spaces in the residentially-zoned areas of the Project Site to accommodate the parking demand generated by residents and guests of the residential portion of the Project Site. This includes up to approximately 6,000 required resident parking spaces and approximately 1,000 guest parking spaces. These parking spaces would be located in the residentially zoned areas of the Project Site and are in addition to the number of spaces created for the retail, commercial, entertainment, casino, residential, and hotel land uses as described above in "Mixed-Use Zone Parking Requirements."

The Proposed Project will contain approximately 1,000 on-street parking spaces. Up to 50% of the on-street parking spaces (approximately 500 spaces) may be utilized to meet the guest parking requirement for the Proposed Project, leaving an excess of approximately 500 spaces for excess parking supply in the Residential Zone. The on-street parking utilized for guest/visitor parking would not be segregated or



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



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research



Figure IV.M-1
Permitted Street Parking

cordoned off. Rather, the on-street parking functions as a parking supply in excess of parking spaces provided on individual residential parcels.

Again, it should be noted that the precise number of resident and guest spaces for the residential units and the location of these spaces will be determined at the time of Plot Plan Review per the requirements of the Development Standards in the Hollywood Park Specific Plan. The Specific Plan's parking standards are designed to meet the parking demand generated by the housing product types proposed for the Project, which tend to generate a smaller number of residents due to the size of the units and the bedroom counts. As a result, the project's parking demands for the residential land uses would be met and impacts would be less than significant.

Civic Zone Parking Requirement

Possible uses for the Civic Site could be a combination of one or more uses, such as an elementary school, library, community center, etc. subject to economic feasibility with respect to construction and operation costs for the respective entity. The Hollywood Park Specific Plan provides that required parking for uses within the Civic Zone shall be as provided in Article 19 of the Inglewood Municipal Code, the Specific Plan, or by a shared parking study.

Under the Inglewood Municipal Code Section 12-46(2)(a), the aggregate amount of off-street parking provided in connection with an elementary school is two parking spaces plus either 1.5 parking spaces per classroom, or one parking space for each 400 square feet of total floor area in classrooms, assembly rooms or other instructional facilities, whichever is greater. If the civic site is used as a school, assuming that the IUSD builds an elementary school with a capacity to house 400 students on the civic site on the Project Site, of which 279 students are estimated to be generated by the Project (see Table IV.K-7 on Page IV. K-37 of the Draft EIR), and assuming that the classroom size is based on the state standard rate of 25 students per elementary classroom, the parking for the elementary school required under the IMC would be 32 parking spaces. More parking could be required under the IMC if one parking space for each four hundred square feet of total floor area in classrooms, assembly rooms or other instructional facilities would yield more than 32 parking spaces. Since the exact floor area of classrooms is unknown, because the ultimate use of the site is unknown, the site would require a minimum of 32 parking spaces.

If the civic site is developed as a public library or other public facilities not utilized as offices, IMC Section 12-46(6) provides that the parking requirement is to be determined by the Planning Commission pursuant to Section 12-48 of the IMC, which requires the Planning Commission to determine the parking requirement, and by resolution, set forth its findings and reasons for making the determination.

Because the Applicant would need to demonstrate, as part of the Plot Plan Review process, that sufficient parking is provided, the Proposed Project would provide adequate parking in accordance with the actual parking demands during each phase of development and occupancy. The Proposed Project may include has the capacity to provide up to 7,778 structured parking spaces in Parking Structures 1 through 5 for the

Mixed-Use zone³, while the residential parking on the residential land uses would be parked according to the standards in the Hollywood Park Specific Plan and ~~could~~ has the capacity to include up to 7,700 spaces ~~depending on final bedroom counts of the residential units developed~~. Application of both mixed-use and residential parking standards for the Proposed Project would meet the parking demand generated by the Project. As a result, all of the project's parking demands would be met within the Project Site, and as such, impacts to parking would be less than significant.

Land Use Equivalency Program Impacts

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

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's street configurations, or related use of subterranean parking. Street parking would be provided in a manner similar to that of the Proposed Project. As with the Proposed Project, the Equivalency Program would provide residential and mixed-use parking at the same standards. For any additional retail, office/commercial and hotel area, the Project Applicant would submit a shared parking study at the time of Plot Plan Review to generate the parking demand for the Project. For the additional residential units, the Project Applicant would apply the parking standards in the Hollywood Park Specific Plan to generate the residential (and guest) parking demands for the Project. The Plot Plan would indicate how the Project has met this parking demand and would be reviewed and approved for efficacy. As with the Proposed Project, compliance with the Hollywood Park Specific Plan and Shared Parking Study will ensure that there is sufficient parking to meet the demand.

All Project Design Features and/or recommended mitigation measure to minimize parking impacts under the Proposed Project would be implemented under the Equivalency Program. Consequently, as with the Proposed Project, with implementation of applicable mitigation measures, parking impacts attributable to the Equivalency Program would be less than significant.

CUMULATIVE IMPACTS

It is anticipated that development of the related projects would occur in conformance with the applicable regulations, and other projects would not utilize the same parking facilities as the Proposed Project. The

³ Individual parking structures will be constructed on an as-need basis to meet the shared parking demands of the proposed mixed-use development. It is anticipated that the actual parking demand identified herein may vary by up to 20% at different stages of build-out based on the shared parking demand analysis model to be established in the Specific Plan. Consequently, the size of each individual structure as constructed may vary to reflect parking demand. For purposes of a worst-case air quality and noise analysis, this Draft EIR assumes each structure could be as large and as tall as possible.

Proposed Project's parking demand would be met on site. Four related projects are within close enough proximity to the Project Site that they could potentially increase the cumulative demand for parking within the immediate parking area. These projects include (1) the Forum Site (Related Project I-17), a 250,000 square foot retail center with 1,000 dwelling units; (2) the Homestrech at Hollywood Park (Related Project I-19), a 796,970 square foot retail center; (3) the Prairie Promenade (Related Project I-5), a 97,490 square foot retail center; and (4) the Inglewood Promenade (Related Project I-1), a 1,792,472 square foot retail center. Similar to the Proposed Project, each of these projects are expected to provide sufficient parking space to meet the demand for parking, such that spill-over or unplanned shared parking practices would not occur. Cumulative parking impacts would therefore be less than significant.

Impacts pertaining to queuing are site-specific impacts. Thus, impacts associated with access and queuing would not contribute to a cumulative impact.

PROJECT DESIGN FEATURES

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

MITIGATION MEASURES

MM M-1. At the time of Plot Plan review, the Project Applicant shall provide a Shared Parking Study with the parking requirements for the Mixed-Use zone on the Project Site and the plan will show where the parking spaces are provided on the site in the Mixed-Use zone and demonstrate that sufficient parking is provided, in accordance with the standards of the Specific Plan.

MM M-2. Prior to the construction stage of the Project, the Project Applicant will submit a Construction Staging Plan to be approved by the Planning and Building Department. As part of the Construction Staging Plan, parking for construction workers will be identified on the Project Site so as not to affect parking in adjacent neighborhoods.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

The project's parking impact would be less than significant after mitigation.

IV. RESPONSES TO COMMENTS

The Notice of Completion and Availability of the Draft EIR was circulated on October 9, 2008 advising the public and public agencies that the Draft EIR would be made available for review and comment from October 9, 2008 to November 24, 2008. The following comment letters on the Draft EIR were received:

State Agencies

1. State of California, Office of Planning and Research, State Clearinghouse and Planning Unit, Terry Roberts, Director, November 25, 2008.

Regional Agencies

2. County of Los Angeles Department of Public Works, Land Development Division, Dennis Hunter, PLS PE, Assistant Deputy Director, November 26, 2008.
3. County of Los Angeles Sanitation Districts, Facilities Planning Department, Ruth I. Frazen, Customer Service Specialist, November 4, 2008.
4. County of Los Angeles Regional Planning Commission, Airport Land Use Commission, Bruce W. McClendon, FAICP, Director of Planning, November 20, 2008.

City of Inglewood (Lead Agency) Comments

5. City of Inglewood, Sheldon Curry, Assistant City Administrator for Development, November 26, 2008.
6. City of Inglewood, Wanda Williams, Acting Planning and Building Director, November 24, 2008.
7. City of Inglewood, Public Works, Glen W.C. Kau, Director, November 24, 2008.
8. City of Inglewood, Michael F. Calzada, Residential Sound Insulation Director, November 24, 2008.
9. PBS&J, Peer Review Consultant to the City of Inglewood, November 24, 2008.

Individuals and or Organizations

10. Dr. Joel Kirschenstein, Sage Institute Inc., District Consultant for Inglewood Unified School District, November 24, 2008.

11. Southern California Edison Company, Local Public Affairs Department, Steven Bradford, Region Manager, November 25, 2008.
12. Habitat for Humanity Greater Los Angeles, Robert Dwelle, Real Estate Director, November 12, 2008.
13. Dr. Jan Brown, October 14, 2008.
14. Helen Wilton, November 24, 2008.

Other Comment Letters

The following comment letters were received after the close of the public comment period but prior to the publication of the Final EIR.

15. County of Los Angeles Department of Public Works, Flood Maintenance Division, Gary Hilderbrand, South Area Engineer, December 22, 2008.
16. Mark Gorman, 8194 Medford Street, Ventura CA 93004, December 23, 2008.
17. PBS&J, Peer Review Consultant to the City of Inglewood, Gary Carlin Memorandum dated November 18, 2008.
18. PBS&J, Peer Review Consultant to the City of Inglewood, Gary Carlin Memorandum dated November 20, 2008.
19. PBS&J, Peer Review Consultant to the City of Inglewood, Alison Rondone letter dated December 10, 2008.
20. PBS&J, Peer Review Consultant to the City of Inglewood, Gary Carlin Memorandum dated January 14, 2009.
21. County of Los Angeles Fire Department, Frank Vidales, Acting Chief, Forestry Division, Prevention Services Bureau, January 26, 2009.

The comment letters and written responses to the comments are provided below. Copies of the original comment letters are also provided in Appendix J to this Final EIR.¹

¹ Appendices A through I were circulated with the Draft EIR and bound under separate cover. Appendix J: Comment Letters on the Draft EIR is bound within this Final EIR.

COMMENT LETTER No. 1

Terry Roberts
Director, State Clearinghouse
Governor's Office of Planning and Research
Dated 11/25/2008

COMMENT 1.1

Dear Sheldon Curry:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on November 24, 2008, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

RESPONSE 1.1

This comment acknowledges receipt and review of the Draft EIR by the State Clearinghouse. This comment also indicates that the Proposed Project has complied with the State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act. No state agencies provided comments on the Draft EIR.

COMMENT LETTER No. 2

Dennis Hunter, PLS PE
Assistant Deputy Director, Land Development Division
County of Los Angeles Department of Public Works
Dated 11/26/2008
Received 11/26/2008

COMMENT 2.1

Thank you for the opportunity to review the DEIR for the subject project. The proposed development

consists of the demolition of all improvements and structures on the project site including the Hollywood Park Racetrack and grandstand, the construction of approximately 2,995 residential units (single-family townhomes, stacked flats, condominium buildings, and residential units over retail), 620,000-square-foot of retail space, 75,000-square-foot of office/commercial space, a 300-room hotel including 20,000-square-foot of meeting space, 100,000- to 120,000-square-foot of casino/gambling space, 10,000-square-foot of community-serving uses for the homeowner's association, 4 acres for civic uses, and 25 acres for open space/recreational areas.

The project will be built out in three phases with an anticipated build out date of 2014. Phase I of the project is comprised of the construction of the retail, hotel, and office components and 1,000 residential dwelling units. Phase II includes the construction of the civic use component and the next 1,000 residential dwelling units. Phase III includes the construction of the remaining 995 residential dwelling units.

The following comments are for your consideration and relate to the environmental document only:

RESPONSE 2.1

This comment summarizes the characteristics of the Proposed Project and does not warrant a detailed response. However, it should be noted that the Project consists of the demolition of most improvements and structures on the Project Site—not all improvements and structures on the Project Site as stated by the commenter. Specifically the casino will remain in its existing location on the Project Site and will be remodeled and reconfigured. It should also be noted that the phasing referred to in the comment represents the phasing plan for implementation of the traffic mitigation measures—not the construction phasing. The phasing plan is broken into two portions – construction phasing (detailing the construction of the property based on market conditions) and the traffic mitigation program phasing (detailing the implementation of the traffic mitigation program based on project occupancy).

With regard to the construction phasing, four major development phases are anticipated with construction starting with the casino renovation and retail center in the southwest corner of the property and continuing northeasterly toward the proposed Bluff Park and the existing Renaissance neighborhood. Please refer to Response 19.2 for additional information regarding construction phasing for the Project.

COMMENT 2.2

Traffic/Access

Upon the expected build out year of 2014, the project is expected to generate approximately 17,222 vehicle tripends daily during a typical weekday with 1,604 tripends generated during the weekday a.m. peak hour and 1,565 tripends in the weekday p.m. peak hour. The project is also expected to generate approximately 25,508 tripends daily during a typical weekend day and 1,374 vehicle trips during the weekend mid-day peak hour.

RESPONSE 2.2

As a clarification, the Proposed Project is expected to generate 39 fewer vehicle trips during the weekday PM peak hour due to the existing racetrack which will be removed to accommodate the proposed project. Refer to Pages IV.L-12, 16-19 of the Draft EIR for the project trip generation analysis section. All of the other vehicle trip totals as noted by the commenter are correct, and consistent with the Draft EIR.

It should be noted that based on other comments provided by the City of Inglewood, an updated traffic impact analysis was also prepared. As provided in the supplemental analysis, the Proposed Project is expected to generate an additional 1,604 vehicle trips during the weekday AM peak hour and an additional 419 vehicle trips during the weekday PM peak hour. During the weekend mid-day peak hour, the Proposed Project is expected to generate an additional 1,744 vehicle trips. Refer to Response to Comment 20.3 and the Additions and Corrections Section of this FEIR for a discussion of the updated traffic impact analysis. No changes to the conclusions of the Draft EIR traffic impact analysis result from the updated traffic impact analysis.

COMMENT 2.3

We request the County's traffic impact analysis methodology be used when evaluating any County and/or County/City intersections. A copy of our Traffic Impact Analysis Report Guidelines may be obtained on the County of Los Angeles Department of Public Works' website at <http://www.ladpw.org/traffic>. We also request the study address the cumulative impacts generated by this and nearby developments and include the Level of Service (LOS) analysis for the County and/or County/City intersections. The LOS analysis for the intersections shall be conducted for the following scenarios:

- a) Existing traffic
- b) Existing traffic plus ambient growth of 0.7 percent to the year 2014
- c) Traffic in Section b plus project traffic
- d) Traffic in Section c with the proposed mitigation measures (if necessary)
- e) Traffic in Section c plus cumulative traffic of other known developments
- f) Traffic in Section e with the proposed mitigation measures (if necessary)

RESPONSE 2.3

The Traffic Impact Study for the proposed Hollywood Park Redevelopment Project was prepared in accordance with the methodologies and application of the significance thresholds approved for use by the City of Inglewood (the Lead Agency). Project related impacts as well as cumulative impacts were identified and appropriate transportation mitigation measures were considered and disclosed on this basis.

Traffic analysis scenarios as outlined and requested by the commenter are the same scenarios analyzed in the Traffic Impact Study for all study intersections. Refer to Page IV.L-29 of the Draft EIR and Page 81, Appendix G-1 of the Draft EIR for the same six scenarios analyzed in the Traffic Impact Study for all study intersections. It should be noted that the Traffic Impact Study utilized an annual ambient growth factor of 0.65 percent to the year 2014 (as opposed to the 0.70 percent as noted and requested by the commenter). The 0.65 percent ambient growth rate was determined based on a review of the background traffic growth estimates published in the 2004 Congestion Management Program for Los Angeles County. The CMP document indicates that traffic volumes would be expected to increase at an annual rate of approximately 0.65 percent between 2005 and 2015. Thus, the annual growth rate of 0.65 percent is consistent and appropriate. It should be noted that had the 0.70 percent annual growth rate been used, it would only result in a negligible increase in future background traffic (as the total percentage difference between using the 0.70 percent and 0.65 percent from year 2006 to year 2014 would be less than one-half of one percent). Such nominal increase in future background traffic will not change the overall traffic analysis and results as concluded in the Draft EIR Traffic Impact Study.

COMMENT 2.4

We do not agree with the traffic impact study's LOS analysis for the following intersections. Based on the County's traffic impact analysis methodology, we expect the traffic generated by the project alone will significantly impact the intersections. The study should revise the LOS analysis at these intersections and propose feasible mitigation measures:

- La Cienega Boulevard at Century Boulevard
- La Brea Avenue at Slauson Avenue

RESPONSE 2.4

The traffic impact analysis for the proposed Hollywood Park Redevelopment Project was prepared in accordance with the methodologies and application of the significance thresholds approved for use by the City of Inglewood (the Lead Agency). Project related impacts as well as cumulative impacts were identified and appropriate transportation mitigation measures were considered and disclosed on this basis at all the study intersections.

For informational purposes, the Traffic Impact Study (Appendix G-1 of the Draft EIR) also included a supplemental analysis for the study intersections located outside the City of Inglewood using the methodologies and significance thresholds for Los Angeles County and other adjacent jurisdictions. Refer to Section 11.0, Pages 108-110, Appendix G-1 of the Draft EIR for the supplemental traffic analysis using the local jurisdiction methodologies and significance thresholds.

The intersection of La Cienega Boulevard and Century Boulevard, as referenced by the commenter, is located within the boundaries of three agencies. Both the northwest quadrant and the southwest quadrant of this intersection are located within the City of Los Angeles, while the northeast quadrant is located

within the City of Inglewood and the southeast quadrant is located within the County of Los Angeles. The Traffic Impact Study evaluated potential project and cumulative project impacts using the City of Inglewood methodologies and significance thresholds for this intersection.

To further address this comment, updated level of service calculations have been prepared for the intersection of La Cienega Boulevard and Century Boulevard using the County of Los Angeles methodologies and significance thresholds. Based on the updated level of service calculations using the Lead Agency's thresholds of significance, significant traffic impacts due to the proposed project will not be expected. The updated level of service calculations for this intersection are included in Appendix K-7 of the Final EIR. It should be noted that the level of service calculations also reflected the updated traffic impact analysis based on other City of Inglewood comments (refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis).

The intersection of La Brea Avenue and Slauson Avenue, as referenced by the commenter, is located within the County of Los Angeles. As summarized on Page 109 of the Traffic Impact Study (Appendix G-1 of the Draft EIR), this intersection was identified to have a significant traffic impact based on the County of Los Angeles methodologies and significance thresholds. The supplemental traffic impact analysis prepared for this intersection utilizing the County of Los Angeles methodologies and significance criteria was summarized in Appendix E of the Traffic Impact Study (see Appendix Table E-4 of Appendix G-1 of the Draft EIR).

As the Hollywood Park Traffic Impact Study was prepared in accordance to the methodologies and significance thresholds of the Lead Agency, the supplemental analysis using the local methodologies and significance thresholds was provided for informational purposes. As a result, additional project mitigation measures were not developed or required.

COMMENT 2.5

The following intersections were not analyzed in the traffic impact study. Based on existing count data, we expect the traffic generated by the project alone will significantly impact the intersections. The project shall include LOS analyses at these intersections and propose feasible mitigation measures as needed:

- Van Ness Avenue at Century Boulevard
- Normandie Avenue at Century Boulevard

RESPONSE 2.5

Please refer to Response 5.45 for a discussion regarding the traffic impact analysis study area and Article 13 of the CEQA Guidelines, which discusses the focus of review and evaluation of EIRs and Negative Declarations.

Under Section 15204 of the CEQA Guidelines, the scope of the traffic analysis in the Draft EIR was fully adequate to satisfy CEQA. However, to further address the comment, additional analysis was undertaken for the intersection of Van Ness Avenue and Century Boulevard, utilizing the City of Inglewood methodologies and significance thresholds only.

The additional traffic analysis included new weekday AM peak period, PM peak period, and Saturday midday peak period turning movement counts conducted at the intersection of Van Ness Avenue and Century Boulevard. In addition, the respective project and related projects traffic generation, distribution, and assignment from the adjacent study intersections are extended through this intersection. It should be noted that the level of service calculations also reflected the updated traffic impact analysis based on other City of Inglewood comments (refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis).

The results of the additional traffic analysis for this intersection are included in Appendix K-1 of the Final EIR. As summarized in Table IV.L-2 in the Revised Traffic Section of the Final EIR, application of the City of Inglewood threshold criteria to the “With Proposed Project” scenario indicates that the proposed Hollywood Park Redevelopment project is not expected to create a significant impact at the intersection of Van Ness Avenue and Century Boulevard. Incremental but not significant impacts are noted at this intersection as presented in the Revised Table IV.L-2. It should be noted that although this intersection was not included as part of the Draft EIR Traffic Impact Study and a significant project impact is not anticipated at this intersection, the project applicant has proposed to provide full funding (i.e., 100% of the contribution, not fair share or proportionate share) to develop and enhance the City’s Intelligent Transportation System (ITS) at this intersection. Please refer to Pages 112-113 of Appendix G-1 of the Draft EIR for the list of the additional intersections proposed to be implemented as ITS improvements.

The commenter’s statement that traffic generated by the Project alone would significantly impact the intersection of Normandie Avenue and Century Boulevard is not substantiated by the data. Intersections located in close proximity to a project will typically have greater potential to experience significant traffic impacts than intersections located further away, as project related traffic will begin to dissipate away from the site. In addition to the intersection of Van Ness Avenue and Century Boulevard analyzed above, the study intersection of Western Avenue and Century Boulevard was evaluated in the Traffic Impact Study and determined to have no significant project-related impacts. Both of these intersections are located along the Century Boulevard corridor closer to the Hollywood Park project site than the intersection of Normandie Avenue and Century Boulevard. In addition, other study intersections located along the Century Boulevard corridor near the Normandie Avenue and Century Boulevard intersections were also evaluated in the Traffic Impact Study and determined to have no significant project-related impacts. These study intersections include Vermont Avenue/Century Boulevard, Figueroa Street/Century Boulevard, I-110 Freeway Southbound Off-Ramp-Grand Avenue/Century Boulevard, and I-110 Freeway Northbound On-Ramp-Olive Street/Century Boulevard. Therefore, based on the analysis results associated with these adjacent intersections, the intersection of Normandie Avenue and Century Boulevard is not expected to result in a significant project impact.

COMMENT 2.6

We generally agree with the traffic impact study that the cumulative traffic generated by the project and other related projects will have a significant impact to the following County intersection:

- La Cienega Boulevard Southbound Ramp at Slauson Avenue

North approach: One left-turn lane, one shared through/right-turn lane, and one exclusive right-turn lane instead of one shared through/left-/right-turn lane and an exclusive right-turn lane. The project's pro-rata share is 5.3 percent or \$27,825.

RESPONSE 2.6

The cumulative mitigation measures suggested by the commenter are different from the cumulative mitigation measures proposed in the Traffic Impact Study for this study intersection. The Traffic Impact Study recommended a funding contribution to develop and enhance the traffic signal operations at this study intersection. Refer to Page IV.L-80 of the Draft EIR for the recommended cumulative mitigation measure for this intersection. It should be noted that with implementation of the cumulative mitigation measure recommended in the Draft EIR, the cumulative traffic impacts would be mitigated.

Article 13 of the *CEQA Guidelines* corresponds to the review and evaluation of EIRs and Negative Declarations. Specifically, Section 15126.4, Consideration and Discussion of Mitigation Measures Proposed to Minimize Significant Effects, subsection (a)(1)(B) states,

“When several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.”

Pursuant to the above guidelines, the recommended/preferred cumulative mitigation measures as suggested by the commenter would also fully mitigate the cumulative impacts at this intersection. Therefore, as this study intersection is located within jurisdiction of the County of Los Angeles, the project applicant has agreed to provide the project's pro-rata share contribution of [\$27,825] toward the County's recommended/ preferred improvement measures. As a result, Mitigation Measure MM L-22 will be amended to read as follows:

MM L-22. ***Intersection No. 3: La Cienega Boulevard (SB)/Slauson Avenue (County of Los Angeles).*** North approach: One left-turn lane, one shared through/right-turn lane, and one exclusive right-turn lane instead of one shared through/left-/right-turn lane and an exclusive right-turn lane. The Project Applicant shall contribute 5.3% (or \$27,825) of the total estimated cost of the identified improvements ~~to develop and enhance the traffic signal operations~~ at this location.

COMMENT 2.7

Based on the County's traffic impact analysis methodology, we expect the cumulative traffic generated by the project and other related projects will have a significant impact to the following County intersection. The following mitigation measures should be included in the revised report:

- La Cienega Boulevard Northbound Ramp at Slauson Avenue

South approach: Two left-turn lanes and one shared through/right-turn lane instead of one left-turn lane and one shared through/left-/right-turn lane. The project's pro-rata share is 5.4 percent or \$64,800.

If you have any further questions regarding traffic/access comments, please contact Mr. Robert Torres at (626) 300-4709.

RESPONSE 2.7

Using the City of Inglewood's traffic impact analysis methodology (as the Lead Agency), the La Cienega Boulevard Northbound Ramp at Slauson Avenue intersection is not cumulatively impacted by the Project. However, using the County's traffic impact analysis methodology, the Project results in a cumulative impact at the identified intersection. The project applicant has agreed to provide the Project's pro-rata share contribution of \$64,800 toward these improvement measures, as recommended by the County of Los Angeles although this cumulative impact does not exist when using the Lead Agency's methodology. As a result, the Applicant has agreed to contribute to fund the Project's pro-rata share of the costs of the following measure as a Project Design Feature (PDF):

PDF L-9: *La Cienega Boulevard Northbound Ramp at Slauson Avenue (County of Los Angeles)*. South approach: Two left-turn lanes and one shared through/right-turn lane instead of one left-turn lane and one shared through/left-/right-turn lane. The Project Applicant shall contribute 5.4% (or \$64,800) of the total estimated cost of the identified improvements.

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly.

COMMENT 2.8**Hydrology/Water Quality**

- Page IV-F.4:

Per the DEIR, Miscellaneous Transfer Drain No. 922 has on-site connections. Per the drainage study currently under review for the proposed realignment, Miscellaneous Transfer Drain No. 922 bypasses Tract No. 069906 only. Verify this information and clarify discrepancy.

RESPONSE 2.8

Page IV. F-4 of the Draft EIR is accurate regarding Miscellaneous Transfer Drain (MTD) No. 922, which states that the MTD is a 60" stormdrain which accepts on-site and off-site runoff from three different locations on the eastern side of the property including, Home Dept/Target, Watt Development and Darby Park. It drains to either Project 4402 (Line C) or Project 4401 (Line B) of L.A. County stormdrains. The current drainage report under review by the Department of County Public Works will be modified to address the on-site connections.

COMMENT 2.9

- Page IV-F.6

See Chapter 4 of Public Works' 2006 Hydrology Manual for the Policy on Levels of Flood Protection. Storm drains are not necessary designed for a 25-year storm event as indicated in the DEIR.

RESPONSE 2.9

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the fourth sentence in the first paragraph on page IV.F-6 will be modified to read as follows: The LACDPW requires all storm drain facilities not covered under the Capital Flood Protection conditions to be designed to accommodate an Urban Flood, a 25-year storm which has ~~a 100 percent chance of happening every 25 years~~ 1/25 percent chance of being equaled or exceeded in any year.

COMMENT 2.10

- Table IV-F.1 and Table IV-F.2

Preliminary flow calculations and allowable runoff rates for proposed connections to Los Angeles County Flood Control District facilities are subject to review and approval by Public Works; this should be clearly stated in the CEQA document.

RESPONSE 2.10

All infrastructure improvements and conveyance of such facilities to the LACFCD will be conducted in accordance with all applicable rules and regulations of LACDPW. Preliminary flow calculations and allowable runoff rates for proposed connections to Los Angeles County Flood Control District facilities have already been reviewed and approved by the LACDPW. As stated on page IV.F-6 of the DEIR, the LACDPW provided a confirmation of the hydraulic design capacity and allowable flow rates of discharge to each of the stormdrains located downstream. For reference, the information summary request sheets provided by the LACDPW are contained in Appendix F-2 to the Draft EIR.

COMMENT 2.11

- Page IV-F.26

The proposed realignments of Project 4401 (Line B) and Miscellaneous Transfer Drain No. 922 are both subject to compliance with the Miscellaneous Transfer Drain process in order to be eligible for transfer, operation, and maintenance by the Los Angeles County Flood Control District.

RESPONSE 2.11

Comment Noted. All infrastructure improvements and conveyance of such facilities to the LACFCD will be conducted in accordance with all applicable rules and regulations of LACDPW.

COMMENT 2.12

- Table IV.F-4 and Page IV-F.53

Discuss why and how increased imperviousness and runoff volume result in less than significant impacts with respect to threshold questions.

If you have any further questions regarding hydrology comments, please contact Ms. Liz Cordova at (626) 458-4921.

RESPONSE 2.12

Under the CEQA Guideline thresholds (d) and (e), a project would have a significant impact if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or if the project would create or contribute to runoff water that would exceed the capacity of existing planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

The predicted average annual stormwater runoff volumes identified in Table IV.F-4 show that the Project Site will experience an increase in average annual runoff under the Proposed Project. This is primarily due to the increase in impervious surface area which will increase from 47% of the total site area (existing) to 73% of the total site area (proposed). While the total annual volume of runoff is anticipated to increase, the amount of stormwater entering the stormdrain system would be subject to hydrologic source controls and treatment control BMP's to ensure stormwater runoff volumes are adequately managed, as well as mitigation measures designed to reduce impacts related to polluted runoff during project construction and operation. As noted on page IV.F-26 of the Draft EIR, the design runoff would be managed to not exceed the recommended and allowable runoff flows determined by LACDPW. The design runoff for Project 681 & 4402 is approximately 65.8 cfs, which is less than the LACDPW allowable rate of 72.1 cfs. The design runoff for Project 4401, Line A and DDI #8 is approximately 270

cfs, which would be reduced to an allowable runoff of 124.5 cfs by utilizing the Lake as a detention basin. These measures will ensure that Project 4401, Line A and DDI #8 do not exceed LACDPW's recommended allowable discharge of 286 cfs. Therefore, with respect to threshold questions (d) and (e), the Proposed Project would not create or contribute runoff water that would exceed the capacity of existing planned stormwater drainage systems.

COMMENT 2.13

Environmental Programs

- Storage Space for Recyclables

The California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires each development project to provide an adequate storage area for collection and removal of recyclable materials. The environmental document should include/discuss standards to provide adequate recyclable storage areas for collection/storage of recyclable and green waste materials for this project.

RESPONSE 2.13

The Project's impacts upon solid waste facilities are addressed in Section IV.J.4 of the Draft EIR. Also, as stated on pages IV.J-58 and II-31 of the Draft EIR, Project Design Feature (PDF) J.4-2 requires that the Proposed Project follow all applicable City of Inglewood policies related to curbside collection and recycling programs. Furthermore, as part of the Plot Plan Review process, the Hollywood Park Specific Plan requires submission of a completed Sustainability Checklist specifying those sustainability measures to be included in the development that is the subject of the Plot Plan Review/Building Permit. Under "Goal 4: Reduce, Reuse and Recycle" in the Sustainability Checklist, Goal 4-5 will require each project within the Specific Plan to provide adequate space for storing and handling recyclables. For example, single-family units will have dual bins for each unit—a recycle bin and a garbage bin. Multi-family units may have recycle bins and garbage bins for each unit or grouped recycling and garbage collection areas. Please refer to Section 5.3.2 on Page 5-5, and Page xxi of the Appendix of the Hollywood Park Specific Plan for further discussion regarding the Sustainability Checklist and its implementation.

COMMENT 2.14

- Underground Storage Tanks/Industrial Waste/Stormwater Comments

Should any operation within the subject project include the construction, installation, modification, or removal of underground storage tanks Public Works' Environmental Programs Division must be contacted for required approvals and operating permits.

If you have any further questions regarding the environmental comments above, please contact Mr. Corey Mayne at (626) 458-3524.

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921.

Very truly yours,

DEAN D. EFSTATHIOU
Acting Director of Public Works

RESPONSE 2.14

Comment noted. The Project Applicant will obtain all applicable approvals and operating permits associated with the construction, installation, modification, or removal of underground storage tanks from the Public Works' Environmental Programs Division.

COMMENT LETTER No. 3

Ruth I. Frazen
Customer Service Specialist
Facilities Planning Department
L.A. County Sanitation Districts
1955 Workman Mill Road
Whittier, CA 90601-1400
Dated 11/4/2008
Received 11/10/2008

COMMENT 3.1

Dear Mr. Curry:

Hollywood Park Redevelopment Project

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on October 8, 2008. The proposed development is located within the jurisdictional boundaries of District No. 5. We offer the following updated information and comments regarding sewerage service:

- Page II-36 under discretionary approvals: "L.A. County Sanitation District Sewer Main Realignment Permit" should be changed to read : "L.A. County Sanitation District Sewer Main Relocation Permit"

RESPONSE 3.1

This comment confirms that the Project Site is located within District No. 5. The suggested correction has been made to the Additions and Corrections Section of the Final EIR. This comment merely clarifies the terminology of the required permit and does not affect the findings or conclusions of the environmental analysis.

COMMENT 3.2

- Page IV.J-34, Wastewater Infrastructure, 1st paragraph: The Joint Water Pollution Control Plant has a design capacity of 400 mgd and currently processes an average flow of 303.3 mgd.

RESPONSE 3.2

Comment noted. The design capacity and current wastewater processing statistics cited in the Draft EIR were obtained from a prior correspondence with the County Sanitation Districts of Los Angeles County dated January 2, 2007 (see Appendix E-2, page 14). This update to the design capacity and current processing statistics will be noted within the Additions and Corrections Section of the Final EIR. It should be noted that this correction increases the design capacity of the Joint Water Pollution Control Plant and reflects a reduction in average wastewater processing flows, and therefore there would be more overall capacity in the plant to accommodate this project. As this would result in improved conditions with respect to the Joint Water Pollution Control Plant's ability to serve the project, no further changes to the analysis are required.

COMMENT 3.3

- All other information concerning District's facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin
Ruth I. Frazen
Customer Service Specialist

Facilities Planning Department

RESPONSE 3.3

This comment acknowledges that all other information concerning District's facilities and sewerage service contained in the document is current. No further response is warranted.

COMMENT LETTER No. 4

Bruce W. McClendon, FAICP
Director of Planning
County of Los Angeles Regional Planning Commission
Airport Land Use Commission
Dated 11/20/2008
Received 11/26/2008

COMMENT 4.1

The State of California, Department of Transportation, Division of Aeronautics recently brought to our attention that the City of Inglewood has completed a Draft Environmental Impact Report for the Hollywood Park Redevelopment Plan. In accordance with the Public Utilities Code (PUC), Section 21676, the Airport Land Use Commission (ALUC) has the responsibility of reviewing local jurisdiction actions for compatibility with the adopted Airport Land Use Plan (ALUP). The type of project requiring ALUC review includes individual developments within the established ALUP planning boundaries.

RESPONSE 4.1

Comment noted. The project's compatibility with the adopted Airport Land Use Plan (ALUP) is discussed in Section IV.I Land Use Planning in the Draft EIR. As stated on Page IV.I-4 of the Draft EIR, the Project Site is partially within the Planning Boundary/Airport Influence Area for the LAX airport as designated by the Los Angeles County Airport Land Use Plan. Since a portion of the Project Site lies within the ALUC's jurisdiction, the ALUC is identified as a responsible agency in Section II.D Project Description of the Draft EIR. A copy of the Notice of Completion and Draft EIR was sent to the ALUC.

COMMENT 4.2

Pursuant to the above PUC provision, the City of Inglewood must submit the proposed project for a determination of consistency. Project information and reviewing fees of \$3,000.00 should be filed with the Department of Regional Planning. The review by the ALUC may take place concurrently with the discretionary reviews by the City of Inglewood, as long as it is accomplished before a final decision is made.

If you have any questions in this regard, please call Susana Franco-Rogan or me at (213) 974-4885, Monday through Thursday between 7:30 a.m. and 5:30 p.m. We are closed on Fridays

Very Truly Yours,

DEPARTMENT OF REGIONAL PLANNING
Bruce W. McClendon, FAICP
Director of Planning

RESPONSE 4.2

The Applicant and the City of Inglewood will submit the proposed project for a determination of consistency with the Airport Land Use Plan by the Airport Land Use Commission. As this comment does not provide any further comments regarding the adequacy or completeness of the Draft EIR no further response is required.

COMMENT LETTER No. 5

Sheldon Curry
Assistant City Administrator for Development
City of Inglewood
Dated 11/26/2008

COMMENT 5.1

Dear Mr. Moreland:

Recently, the Draft Environmental Impact Report (DEIR) was circulated for the proposed 238-acre mixed-use project at Hollywood Park at an address commonly known as 1050 South Prairie Avenue. The DEIR was circulated to provide an opportunity for review and comment by the public, governmental entities, and interested parties. Additionally, the City of Inglewood (the Lead Agency) circulated the document to City staff and PBS&J, the consultant firm assisting the City with the review of the project. As you are aware, we have been forwarding comments to your environmental consultant upon receipt of the comments. This correspondence, along with other comments you will receive, will apprise you of the comments from the City of Inglewood staff for the DEIR. The reviews focused on the comprehensiveness of the document and were conducted in accordance with the California Environmental Quality Act (CEQA) requirements. Additionally, where clarity or more detail was deemed warranted, the review also focused on those areas and issues that could have a material affect on the requisite environmental categories if not adequately addressed. Staff wants to ensure that material/substantive issues are identified that could have a bearing on the City's ability to ensure that all identified impacts can be mitigated to so that the City is not adversely impacted if the project ultimately receives approval.

The following are my comments based on my review of a number of areas of the DEIR.

RESPONSE 5.1

Comment noted. All comments provided by the City of Inglewood and its peer review consultant, PBS&J, are included in the Final EIR and as noted in this Section.

COMMENT 5.2***Comments/Overview***

Throughout this document there will be repeated references to concerns that for your proposal to receive substantive concept Specific Plan approval from the City, and for the City of Inglewood to agree to your liberal land use equivalency program, approve your equally flexible shared parking methodology, all without the City having any “solid” and “viable” ability to affect future buildings, is potentially problematic. Assuming all of the identified issues and impacts are tweaked, mitigated and ultimately approved, it may be difficult for the City to support this approach given the apparent inability of the City to ensure that it will not be unduly impacted or compromised because no future, discretionary actions would be required relative to the Specific Plan as proposed. Therefore, as there are a number of references in the Draft Environmental Impact Report (DEIR) that speak to mitigation that relates to this concern, we believe it very important that we address this in the DEIR.

RESPONSE 5.2

The Hollywood Park Specific Plan sets limits on the overall amount of development and allowable land uses, provides the general standards for street dimensions, parking, building types, improvements and landscape, and sets overall height limit and density limits for Hollywood Park. The Specific Plan creates a framework for design and development that will happen over many years. In some cases, the Specific Plan creates new zoning standards to govern the build-out of the Specific Plan area to allow for different uses than would otherwise be permitted under current zoning, and to be able to respond to market conditions given the long-term buildout horizon for the Project. Although the Specific Plan provides for a certain amount of flexibility due to the long-term buildout of the Project to account for market conditions and new uses, the Specific Plan is tempered by the development standards, design guidelines and implementation mechanism in the Specific Plan (i.e. the Plot Plan Review Process).

The Specific Plan has built in mechanisms to provide the City with a “solid” and “viable” mechanism for control of the quality of the product that is built on the Project Site. As the Specific Plan area is built out, the City shall review designs and landscaping of individual developments through the Plot Plan Review Process provided in the Specific Plan. This review process will allow the City to ensure consistency with the goals, vision and requirements of the Specific Plan. The Specific Plan presents Development Standards to guide developers, builders, architects and engineers in designing buildings and environments at Hollywood Park. These Development Standards form the basis of evaluation for review and approval of development on the Project Site. The Plot Plan Review is designed to ensure that future development of parcels are consistent with the Development Standards.

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT 5.3**1. Page I-6, “Alternatives to the Proposed Project”**

The third line of the No Project Alternative (Continuing Existing Land Use); remove “discretionary requests” OR explain why the necessity for the inclusion of those two words in this section.

RESPONSE 5.3

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the first bullet on page I-6 will be modified to read as follows: No Project Alternative – Continuation of Existing Land Use: This alternative analyzes the environmental consequences of the on-going operation of the existing Hollywood Park Racetrack and Casino ~~without any new discretionary requests.~~

COMMENT 5.4**2. Page I-7, “Alternative RU 800”**

For clarity, and consistency with the information listed for RU 1,000 and RU 3,500, specify that this alternative examines a maximum of 800 units.

RESPONSE 5.4

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the first line of the second bullet on page I-7 will be modified to read as follows: Alternative RU 800/Reduced residential (800 units maximum)/retention of racing and racetrack.

COMMENT 5.5**3. Page I-7, “Alternative RU 3,500”**

For clarity, and consistency with the information listed for the other RU representations, specify that the race track/grand stand will be demolished and the Casino will be retained.

RESPONSE 5.5

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the first and second line of the fourth bullet on page I-7 will be modified to read as follows: This alternative includes the retention of the Casino and demolition of the Racetrack, and it provides an increased residential project with 3,500 dwelling units.

COMMENT 5.6**4. Pages I-7 and I-8, “Maximum Housing Unit Alternative”**

For clarity (although practically assumed), specify that the race track/grand stand will be demolished.

RESPONSE 5.6

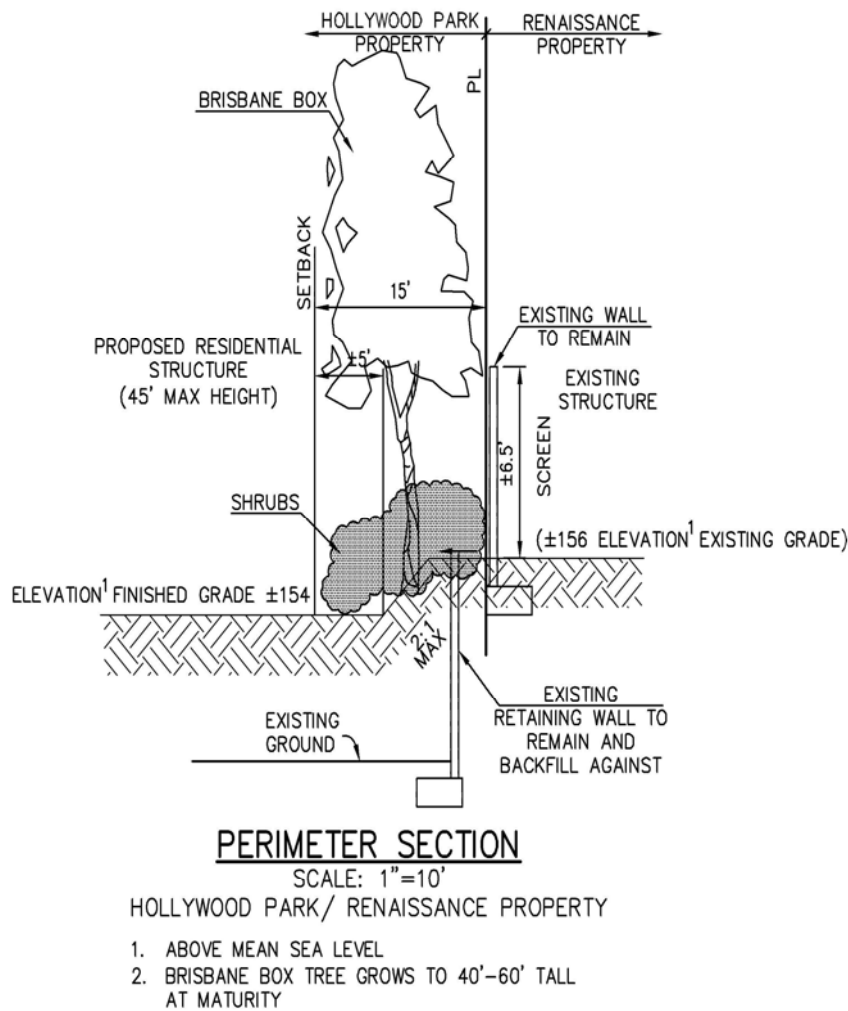
This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the first and second line of the last bullet on page I-7 will be modified to read as follows: This Alternative includes the retention of the Casino and demolition of the Racetrack, and it maximizes the construction of housing, in particular, affordable housing.

COMMENT 5.7**5. Page I-9, Table I-1, Section IV.A. “AESTHETICS, Views and Urban Design”**

Although the less than significant impact representation is likely for this category, it would be prudent to specify the components and dimensions of the landscape buffer proposed between the proposed project and adjacent residential properties. For example, providing approximate existing and finished grade representations along with the typical height (at the crown) for the proposed trees would present a clearer picture for the staff, public and policy makers to ensure the impact would be less than significant.

RESPONSE 5.7

On the northern boundary of the Project Site, the Project abuts the residential development commonly known as the Renaissance. As shown in this cross section below, there exists an elevation difference between the Hollywood Park property and the Renaissance property of two feet. Furthermore, there will be a 15’ landscape buffer between the two developments. A broad leaf, evergreen screen of columnar tree species (Brisbane Box, Lophostemon Confertus) will be planted 25’ on center. Brisbane Box trees generally grow to 40’ to 60’ tall at maturity. This landscape buffer will provide for shade and privacy, offering screening and a more comfortable environment for residents of both developments.



COMMENT 5.8

6. *Figures II-2 and II-3(Aerial Photograph and Existing Site Plan, respectively)*

“Arbor Vista” should be “Arbor Vitae.” Correct as needed where applicable.

RESPONSE 5.8

Comment noted. The Additions and Corrections Section of the Final EIR has been revised accordingly.

COMMENT 5.9

7. *Figure II-2 (Aerial Photograph)*

There are some streets (e.g. 102nd Street and Hardy Street, west of Prairie Avenue) that are barely legible. Make legible as applicable.

RESPONSE 5.9

Comment noted. The Additions and Corrections Section of the Final EIR has been revised accordingly.

COMMENT 5.10**8. Figure 11-4 (Preliminary Land Use Plan)**

Recommend that you utilize a different representation or graphic in the legend to clearly distinguish between “Residential” and “Commercial Recreation.”

RESPONSE 5.10

Comment noted. The Additions and Corrections Section of the Final EIR has been revised to update Figure II-4 on Page II-9 of the Draft EIR to make the distinctions between land uses more clear.

COMMENT 5.11**9. Page II-6, “Existing Conditions”**

(First line of second paragraph.) Stipulate if the referenced slope rises or falls slightly.

RESPONSE 5.11

The Additions and Corrections Section of the Final EIR has been revised to include additional detail on the existing slope of the Project Site. Specifically, the following sentence will be inserted on Page II-6 after the first sentence in the second paragraph: “The surface elevation ranges from approximately 152 feet to approximately 92 feet from the northeast portion of the Site to the southwest portion of the Site.”

COMMENT 5.12**10. Page II-6, “Operations and Events”**

The representation of the daily race track attendance (2001-2006; 780 to 23,000 patrons) is not clear. Clarify if the representations are high and low averages; or do the two attendance figures simply represent the high and low for any day during that five-year period. Also, for context, it is recommended that you provide average daily attendance for each year.

RESPONSE 5.12

The Additions and Corrections Section of the Final EIR has been amended with the correct high and low daily attendance figures from 2000 to 2006. Specifically, the fourth sentence in the third paragraph on Page II-6 will be revised to read as follows, “From 2000 through 2006, ~~daily attendance ranged from approximately 780 to 23,000.~~ the daily Hollywood Park Racetrack attendance records during live racing seasons for the past seven years show the highest weekday attendance at 23,609 patrons, and the highest weekend attendance at 29,151 patrons, while the lowest weekday attendance was at 782 patrons and the lowest weekend attendance was at 5,017 patrons. During the period from 1989 through 2006, the daily attendance records during live racing indicate that the highest and lowest weekday attendance at Hollywood Park was 42,612 and 312, respectively, while the highest and lowest weekend attendance during the same period was 51,151 and 5,017, respectively.”

COMMENT 5.13**11. Page II-10, “Land Use Equivalency Program”**

(First paragraph) Notwithstanding the parking methodology you are proposing, the Land Use Program Equivalency scenarios may be deemed flawed relative to the City’s existing parking standards. An example of this consideration is illustrated in the first representation for your proposed equivalency program. Per the City’s parking standards, 45,000 square feet of retail use would require approximately 128 parking spaces. The exchange you propose that would allow either 281 residential units, (requiring 656 tenant visitor spaces under the present code), 59,400 square feet of office use (198 spaces); only the 141 hotel room scenario (123 to 143 spaces) is anywhere near the parking requirement for the 45,000 square-foot retail use. Additionally, the “or a combination thereof” representation likely does not measure up per the City’s existing standards. The representations discussed to justify parking will be a serious challenge regarding the land use equivalency/conversion considerations throughout the document. Although you are requesting specific plan approval which inherently is not designed to necessarily “comply” with many of the Inglewood Municipal Code standards, the City’s codes will serve as a pertinent frame of reference. Any representations/proposals that fall significantly from the Inglewood Municipal Code requirements may be issues that you will have to comprehensively address and clearly illustrate there will not be impacts, especially in areas like parking and circulation.

The second and third equivalency scenarios on this page have the same characteristics as the first one discussed previously and foster the same concerns and comments. Additionally, the way the section is written there can be some question (s) whether each representation is retail versus only one of the other uses (e.g. 45,000 square feet of retail being converted to 281 units) or that retail can be converted/exchanged to all other uses (e.g. 45,000 square feet retail converted to 281 units, 59,400 square feet of office/commercial use and develop 141 hotel rooms). If the latter is proposed, the challenge for approval could be greater as well as the concerns about the associated impacts.

RESPONSE 5.13

Under the Equivalency Program, land uses may be exchanged based on specific equivalency factors and subject to the limits set forth in the Specific Plan and Page II-10 of the Draft EIR. These factors were developed and result in an equivalent number of motor vehicle (traffic) trips and other environmental impacts for the identified land uses. Because traffic is the major limiting factor, the traffic trips determine the quantities of land uses that can be exchanged without changing the conclusions about the Project's impacts contained in the Traffic Impact Study. However, each use would be required to comply with the parking requirements for that particular use.

In order to implement the equivalency program, a set of equivalency factors have been prepared to convert certain quantities of land uses. The equivalency factor for each use is derived based on the Project's base case of land uses and the weekday PM peak hour project trip generation. The PM peak hour trip generation is used because, in general, more traffic trips are generated in the PM peak hour than in AM peak hour or Saturday mid-day peak hour. As the chart below indicates, 620,000 SF of retail generates 1,414 total PM peak hour trips; 2,995 dwelling units generates 1,094 total PM peak hour trips; a 300-room hotel generates 219 total PM peak hour trips, and; 75,000 SF of general office generates 130 total PM peak hour trips.

LAND USE	SIZE	PM PEAK HOUR TRIPS
Retail	620,000 SF	1,414
Residential	2,995 Dwelling Units	1,094
Hotel	300 Rooms	219
General Office	75,000 SF	130

The next step in generating an equivalency factor is to answer the question: what does one PM peak hour trip equal for each land use component? In calculating this intermediate value ("Trip Equivalency Factor"), the land use quantity is divided by the total PM peak hour trip value (from above table). For example, one PM peak hour trip would be generated by approximately 438 SF of retail ($620,000 \text{ SF} \div 1,414 = 438.47$) or 0.438 for every 1,000 SF of retail. The table below shows the Trip Equivalency Factor for each land use.

LAND USE	Trip Equivalency Factor
Retail (in 1,000 SF)	0.438
Residential (in DU)	2.738
Hotel (in Rooms)	1.370
General Office (in 1,000 SF)	0.577

The final step in generating the land use equivalency factor is to equate the Trip Equivalency Factor calculated above to each land use category. In order to calculate how many equivalent trips are generated by converting 1,000 SF of retail to residential units, the Trip Equivalency Factor value for Residential is divided by the Trip Equivalency Factor value for Retail (i.e., $2.738 \div 0.438 = 6.251$). Therefore, for every 1,000 SF of retail space, 6.251 residential dwelling units would generate the same amount of PM Peak Hour Trips. As stated in Table 15-1 of the Traffic Impact Study, the table below shows how the trip equivalency factor is used to derive the trip equivalencies land uses for conversion.

	Equivalency Ratio to Convert to These Land Use Categories			
	Retail (in 1,000 SF)	Residential (in DU)	Hotel (in Rooms)	General Office (in 1,000 SF)
Retail (in 1,000 SF)	-	6.251	3.128	1.317
Residential (in DU)	0.160	-	0.500	0.211
Hotel (in Rooms)	0.320	1.999	-	0.421
General Office (in 1,000)	0.759	4.745	2.374	-

Taking the first equivalency factor on Page II-10 as an example, the equivalency factor states that 1,000 sf of retail is equal to 6.25 du, 1.32 sf office/commercial space or 3.13 hotel rooms. This simply means that the developer could exchange 1,000 sf of retail for 6.25 dwelling units without changing the impact conclusions with respect to traffic and other impacts in the Draft EIR. This does not mean that if the developer choose to exchange 1,000 sf of retail for 6.25 dwelling units, that the parking required by the Specific Plan would remain the same—as if no land uses were exchanged. Once land uses are converted under the Equivalency Program, then all of the regulations in the Specific Plan governing that particular land use would apply to the new square footages of land uses.

Although the equivalency factors are derived from the analysis in the Traffic Impact Study, the Draft EIR analyzes the potential impacts attributable to each of the six different Equivalency Scenarios under the Equivalency Program in each impact analysis in Section IV. Environmental Impacts. The Draft EIR treats the quantity of land uses derived under the Equivalency Scenario as if it were the “Project.” As such, the impacts of each of the Equivalency Scenarios to aesthetics, air quality, geology, hazardous materials, cultural resources, hydrology/water quality, noise, population, housing and employment, land use, public utilities, public services, traffic/transportation, and parking is provided in the Draft EIR.

For example, under the Maximum Housing 1 Equivalency Scenario, the equivalency factors would allow for 505 additional dwelling units in exchange for 45,000 sf less retail space, 25,000 sf less office/commercial space and 52 less hotel rooms without changing the conclusions reached in the Traffic Impact Study in the Draft EIR. However, since utilizing the Equivalency Scenario results in a new land use program, the Specific Plan would regulate the new quantities of land uses. For example, the parking requirements would apply to all 3,500 dwelling units (2,995 base program + 505 equivalency program)—not just the original 2,995 units. If all of the additional 505 units converted under the Equivalency

Program were 2 bedroom townhomes, then the Specific Plan would require an additional 1,010 parking spaces to meet the needs of the residents, and 167 additional spaces would be required to meet the needs for additional guest/visitor spaces. Likewise, if only 1,000 sf of retail were exchanged for 6.25 dwelling units, then the Specific Plan would require an additional 12 resident parking spaces and 2 guest/visitor spaces, assuming the 6.25 dwelling units are 2 bedroom units. Since the Maximum Housing 1 Equivalency Scenario has 45,000 sf less of retail space and 25,000 sf less of office/commercial space, then the Shared Parking Study required by the Specific Plan for retail and office/commercial space would take into account that there is less retail and office/commercial space.

In response to the commenter's concern regarding whether the equivalency factors convert into only one of each or all of the uses, the Final EIR will be updated to reflect that the equivalency factors are specific to one use. For example, 1,000 sf retail is equivalent to 6.25 du or 1.32 sf office commercial or 3.13 hotel rooms. However, 1,000 sf retail could not be exchanged for 6.25 du plus 1.32 sf office/commercial plus 3.13 hotel rooms. Specifically, the 3 bullet points on Page II-10 of the Draft EIR will be clarified to read as follows:

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

COMMENT 5.14

12. Page II-10, "Land Use Equivalency Program"

The three equivalency factors shown on this page also raise concerns; especially related to selected non-residential uses equivalent to residential uses. Again, notwithstanding your overall proposal, the parking methodology and trial generation data, it is going to be a challenge. For instance, from a scope, scale and parking standpoint the representation that every 1,000 square feet of retail is equivalent to 6.25 residential units is potentially a concern that this may not satisfy the actual parking needs of the project for the mixed-use areas if certain scenarios development of the project. From a City of Inglewood parking requirement standpoint, a 1,000 square-foot general retail use would require three (3) parking spaces versus the 6.25-unit residential use requiring 14 spaces. Additionally, the size of the retail use versus the six units does not appear to be reasonably comparable. Although this overview may seem simplistic, it is important because it is a window into issues and questions that are likely to arise about potential future land uses and how those uses may impact the City. In summary, although we have had discussions over time about this, you have decided to go forward with your proposal. From our standpoint, the land use equivalency proposal may be potentially problematic unless altered with some semblance that will not put the City at undue risk in the future. One possible alternative is to amend your equivalency program to be somewhat less "flexible." Possibly, after a certain threshold you would need Planning Commission

approval. For example, a 1,000 square-foot retail use may be equivalent to two residential units. For any number of units above this, you would need Planning Commission approval. Another possibility, could be establishing thresholds regulating size considerations.

RESPONSE 5.14

Please refer to the discussion of the Equivalency Program in Response 5.13.

In addition, as noted on Page II-10 of the Draft EIR, there are several limitations placed on the use of the Equivalency Program. First, in no case can the developer exchange uses to exceed 505 additional dwelling units, 51,000 additional square feet of retail, 102,000 additional square feet of office/commercial, and 200 additional hotel rooms. This means that the Project Site could not contain more than 3,500 dwelling units, or 671,000 square feet of retail, 176,400 square feet of commercial/office or 500 hotel rooms. Further, since the premise of the Equivalency Program is to exchange gaining more of one land use for less of another, then in no case could the Project Site contain 3,500 dwelling units, and 671,000 sf of retail, and 176,400 sf of commercial/office, and 500 hotel rooms. Second, as discussed on Page II-10 of the Draft EIR, under the Equivalency Program, there would be no change to the Proposed Project's lot or street configurations, depth of excavation, building pad elevations, or development standards and design guidelines under the Hollywood Park Specific Plan (i.e. height limitations, setbacks, etc.). This means that the Land Use Plan shown in Figure II-4 would not change and any additional land uses gained from the conversion would be required to be located in the applicable land use zone. For example, if 1,000 sf of retail is converted into 6.25 dwelling units, the additional dwelling units would be required to be located in the land use zones in the Specific Plan that permit residential dwelling units.

The analysis contained in the Draft EIR under each impact analysis in Section IV. Environmental Impact Analysis studies the impacts of each of the Equivalency Scenarios under the Equivalency Program. The impacts of the Equivalency Program have been disclosed.

This commenter's concern regarding imposing additional limitations on the Equivalency Program is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT 5.15

13. Page II-10, ““Land Use Equivalency Program”

The third paragraph states that “Under the Equivalency Program, there would be no change to the Proposed Project's lot or street configurations, ...” However, on Pg IV. M-15, first paragraph, you state “Furthermore, under the Equivalency Program, there would be “no substantial variation” in the Project's street configurations,.....” The same “No substantial variation” comment is also referenced on page IV. I-34 (Land Use Equivalency Program Impacts) in the second paragraph. Clarify as applicable. Provide the requisite analysis that may be needed to address this consideration if “no substantial variation” is applicable.

RESPONSE 5.15

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, on Page IV.M-15, first paragraph will be modified as follows: Furthermore, under the Equivalency Program, there would be no change ~~substantial variation~~ in the Project's street configurations, or related use of subterranean parking. Also, Page IV. I-34, in the second paragraph will be modified as follows: There would be no change ~~substantial variation~~ in the Project's street configurations or relationship to the surrounding community.

COMMENT 5.16**14. Page II-11, Table II-1 "Land Use Program Equivalency Scenarios"**

Again, the apparent reasonableness of the table needs to be addressed in a way that it is clear that there will be no future impacts associated with potential "exchanges." Using the City's zoning code for the equivalency scenario relative to "Maximum Housing 1" results in a very flexible allowance for residential uses. The additional 505 units require 1,178 tenant and visitor parking spaces. The total combined reduced number of spaces required for the reduction of retail (45,000 square feet), office/community (25,000 square feet) and hotel rooms (52) is only approximately 263 spaces. This type of disparity for conversion/exchange in favor of residential should be addressed in greater detail to clearly illustrate why such potential "exchanges" are reasonable and will not create unanticipated impacts. Additionally, if there was not some uncertainty relative to your parking methodology for shared parking for mixed use, this issue would be less concerning. However, with the liberal conversion from commercial to residential, combined with the shared parking possibilities, again, creates concerns for possible future impacts. Again, a reasonable possible alternative is to create thresholds where future Planning Commission approval is required for conversions/exchanges.

RESPONSE 5.16

As discussed in Response 5.13, taking the first equivalency factor on Page II-10 as an example, the equivalency factor states that 1,000 sf of retail is equal to 6.25 du, 1.32 sf office/commercial space or 3.13 hotel rooms. This simply means that the developer could exchange 1,000 sf of retail for 6.25 dwelling units without changing the impact conclusions in the Draft EIR. This does not mean that if the developer choose to exchange 1,000 sf of retail for 6.25 dwelling units, that the parking required by the Specific Plan would remain the same—as if no land uses were exchanged. Once land uses are converted under the Equivalency Program, then all of the regulations in the Specific Plan governing that land use would apply to the new levels of land uses. Although the equivalency factors are derived from the analysis in the Traffic Impact Study, the Draft EIR analyzes the range of potential environmental impacts attributable to each of the six different Equivalency Scenarios under the Equivalency Program in each impact analysis in Section IV. Environmental Impacts. The Draft EIR treats the quantity of land uses derived under the Equivalency Scenario as if it were the "Project." As such, the impacts of each of the Equivalency Scenarios to aesthetics, air quality, geology, hazardous materials, cultural resources, hydrology/water

quality, noise, population, housing and employment, land use, public utilities, public services, traffic/transportation, and parking is provided in the Draft EIR.

COMMENT 5.17

15. Page II-12, “Scale and Massing”

Provide the approximate typical heights of the buildings and the referenced hotel from existing grade to provide the proper context. Also, include the maximum heights proposed for the project in this section (and as listed in Figure II-7). The “general” representation on pg II-12 of 25-to-60 feet (and two-to-five stories) could be confusing to some when reviewing the “maximum” heights shown on Figure II-7 which lists 45 to 75 feet (and three-to-five stories).

RESPONSE 5.17

The existing grade for the Hollywood Park site ranges from approximately 92 feet at the southwestern corner of the property to approximately 152 feet at the northeastern corner of the property. The finished elevation of the site would range from approximately 90 feet at the southwestern corner of the property to approximately 158 feet at the northeastern part of the property.

Pursuant to Exhibit 2-29, Building Heights Standards in Section 2.7 of the Specific Plan, development adjacent to the single family homes to the north and east of the site will have building heights of no more than forty-five feet at a maximum. Most of the remaining site will have a maximum building height of seventy-five feet. A small portion of the Specific Plan area adjacent to Century Boulevard will have a maximum building height of 150 feet. This area has higher standards to allow for the future development of a hotel. Additionally, areas within the Open Space zone may have one-story buildings designed for maintenance equipment and restroom facilities, no higher than 20 feet tall.

Cupolas, steeples, flags, towers or other ornamental architectural features are permitted to be developed twenty five feet higher than the maximum building height standard. One signature tower element may have a maximum height of one-hundred sixty feet, allowing the architectural feature to be eighty-five feet taller than the maximum building height standard of seventy five feet. This tower identity signage may become an identifiable feature of the Inglewood skyline and may reinforce the significance of Hollywood Park. The comments notes that the Draft EIR states that generally, heights of buildings in the Specific Plan would range from 25 to 60 feet, although Figure II-7 shows the maximum heights permitted. The Draft EIR discusses the general heights of the buildings in the Specific Plan so as to disclose what the majority of the site will look like, although in some cases, the heights may be up to the maximum. Since the entire site will be graded prior to construction, the height limits are relative to the future elevation. With regard to the grade on the hotel site, the existing grade ranges from approximately 105 to 120 feet, while the future grade will be approximately 120 feet.

With the exception of the hotel site and the identity corner and tower, the remaining height districts, which cover more than 90% of the 238-acre site will have similar height restrictions as under current zoning.

The height requirements in the Specific Plan were designed to provide a cohesive and unified design for the entire Specific Plan area and to permit the development of a multi-story hotel. The Specific Plan contains three height zones, with the most restrictive zone adjacent to the single-family homes to the north and east of the Specific Plan area so as to preserve views. See Section 2.7 and Exhibit 2-29 of the Specific Plan.

The height limits allow for a signature identity corner and a tower architectural feature. As provided in Section 3.2.2 of the Specific Plan, the identity corner and tower will be the most prominent feature of the Specific Plan area and will urge passers-by to experience the retail and entertainment neighborhood of the development. A grand tower with identity signage may become an identifiable feature of the Inglewood skyline and may reinforce the significance of Hollywood Park. The comments notes that the Draft EIR states that generally, heights of buildings in the Specific Plan would range from 25 to 60 feet, although Figure II-7 shows the maximum heights permitted. The Draft EIR discusses the general heights of the buildings in the Specific Plan so as to disclose what the majority of the site will look like, although in some cases, the heights may be up to the maximum. Since the entire site will be graded as part prior to construction, the height limits are relative to the future elevation.

COMMENT 5.18

16. Page II-18, “Circulation and Access”

There is a representation that you received input from the City Traffic Engineer. I do not think the City had a City Traffic Engineer in 2008 (Conceptual Map has a July 1, 2008 date). Correct as applicable.

RESPONSE 5.18

The comment refers to input received from the City’s Traffic Engineer during 2006 when the parameters of site access were established. The Conceptual Circulation Map in Figure II-8 was not finalized until July 1, 2008 prior to circulation of the Draft EIR. The Conceptual Circulation Map was reviewed by the Director of Public Works.

COMMENT 5.19

17. Page II-19, Figure II-8 “Conceptual Circulation Map”

Provide a key on the map for clarity for alpha representations.

RESPONSE 5.19

Comment noted. Figure II-8 on Page II-19 will be updated in the Final EIR to remove the alpha representations on the Conceptual Circulation Map for clarity.

COMMENT 5.20**18. Page II-20, “TDM Strategy”**

Subsection (2) stipulates: “Bicycle racks at a ratio of one bicycle space for every 50,000 square feet of non-residential development plus an additional three bicycle spaces...” The subsection is confusing. Is the intent to provide one bicycle rack for every 50,000 square feet of non-residential use and the minimum number of bicycle spaces per rack was omitted? OR; is the intent to have a minimum of three bicycle spaces and to require one bicycle space per every 50,000 square feet? Clarify.

RESPONSE 5.20

The intent of the Transportation Demand Management Strategy related to bicycles is to have a minimum of three bicycle spaces and, in addition to those three spaces, to require one bicycle space per every 50,000 square feet. For example, 620,000 square feet of retail would yield 15 bicycle spaces, that is: 12 spaces (620,000 sf/ 50,000 sf) + 3 spaces (minimum requirement).

COMMENT 5.21**19. Page II-22, “Parking”**

There’s a discrepancy relative to Parking Structure/ (P1). On page II-22, P1 is listed as having up to approximately 2,119 spaces. On page IV. M-5, P1 may have up to approximately 2,199 spaces. Correct as applicable.

RESPONSE 5.21

Comment noted. The Final EIR will be updated to correct the typographical error noted in the comment. Specifically, the first sentence in the second full paragraph on Page II-22 of the Draft EIR will be amended to read as follows: “Parking Structure 1 (“P1”) may contain up to approximately 2,119,199 stalls.”

COMMENT 5.22**20. Page II-23, “Public Benefit Parcel”**

(First paragraph) Remove mention that the precise number of parking for the four-acre site will be determined at the time of Plot Plan Review. Replace it with the minimum and maximum number of spaces required based on the possible uses assessed for the site.

RESPONSE 5.22

As provided in the Hollywood Park Specific Plan, required parking for uses within the Civic Zone shall be as provided in Article 19 of the Inglewood Municipal Code, the Specific Plan, or by a shared parking study.

Under the Inglewood Municipal Code Section 12-46(2)(a), the aggregate amount of off-street parking provided in connection with an elementary school is two parking spaces plus either 1.5 parking spaces per classroom, or one parking space for each 400 square feet of total floor area in classrooms, assembly rooms or other instructional facilities, whichever is greater. Assuming that the IUSD builds an elementary school with a capacity to house 400 students on the civic site on the Project Site, of which 279 students are estimated to be generated by the Project (see Table IV.K-7 on Page IV. K-37 of the Draft EIR), and assuming that the classroom size is based on the state standard rate of 25 students per elementary classroom, the parking for the elementary school required under the IMC would be 32 parking spaces. More parking could be required under the IMC if one parking space for each four hundred square feet of total floor area in classrooms, assembly rooms or other instructional facilities would yield more than 32 parking spaces. Since the exact floor area of classrooms is unknown, because the ultimate use of the site is unknown, the site would require a minimum of 32 parking spaces.

If the civic site is developed as a public library or other public facilities not utilized as offices, IMC Section 12-46(6) provides that the parking requirement is to be determined by the Planning Commission pursuant to Section 12-48 of the IMC, which requires the Planning Commission to determine the parking requirement, and by resolution, set forth its findings and reasons for making the determination.

Page IV.M-6 of the Draft EIR will be amended to include the additional information above regarding parking for the Civic Zone parcel.

COMMENT 5.23**21. Page II-24, "PDF A-3"**

The "Preliminary Building Height Limit Map" representation on this page, and elsewhere, should remove the word "Preliminary." All representations should be stipulated as "proposed" or "maximum" building heights in the DEIR and, of course, the Specific Plan.

RESPONSE 5.23

Comment noted. The title of Figure II-7 on Page II-15 of the Draft EIR will be amended in the Final EIR to read as follows: "Preliminary-Proposed Building Heights Limit Map." Additionally, references to this map will be updated in the Final EIR to reflect its new title.

COMMENT 5.24**22. Page II-35, “Construction Worker Parking/Staging”****RESPONSE 5.24**

The comment states the heading of a section on Page II-35 but does not raise any specific challenge or objection pertaining to the environmental analysis. This comment is noted for the record.

COMMENT 5.25**23. Page III-3, “Related Projects,” Tables III-I**

The project at 11411-11441 South Crenshaw Boulevard should be shown as under construction. Also, the Renaissance project is completed. Amend as applicable.

The statement “Due to the relatively large project area it is anticipated that all construction worker vehicles and construction equipment could be accommodated on site without affecting adjacent neighborhoods” needs more context/information. Primarily, you should stipulate the likely areas for parking/staging in the early phases when structures are being removed.

RESPONSE 5.25

The Related Projects List in Table III-1 identifies a comprehensive list of past, present and probable and possible future projects in Inglewood and the surrounding jurisdictions as derived from building and planning application records from the applicable jurisdictions. This list was compiled in 2006 by the City of Inglewood Planning Department. With respect to the Renaissance project, please refer to footnote b of Table III-1 which states that “approximately 207 units of the total 395-unit Renaissance development project were constructed and occupied when the baseline traffic count data was collected. The remaining 188 units were therefore factored into the related project table for purposes of estimating the cumulative impacts.” With respect to 11411-11441 South Crenshaw Boulevard, while the Project is currently under construction, at the time the traffic counts were taken and other analysis performed, the project was simply “Proposed.” In addition, because the Homestretch at Hollywood Park Project (Related Project I-19) has not proceeded in the intervening years since the Notice of Preparation was circulated, and the Inglewood Promenade Project (Related Project I-1) has now proceeded forward, the Related Projects list in Section III of the Draft EIR has been updated to reflect the current facts.

With respect to construction working parking, an additional mitigation measure has been added to address the commenter’s concern. Specifically, mitigation measures MM M-2 will be added to Page IV. M-16 and will read as follows:

MM M-2. Prior to the construction stage of the Project, the Project Applicant will submit a Construction Staging Plan to be approved by the Planning and Building Department. As

part of the Construction Staging Plan, parking for construction works will be identified on the Project Site so as not to affect parking in adjacent neighborhoods.

COMMENT 5.26**24. Page IV.A, “Aesthetics”**

All references to “90th Street” should be changed to “Pincay Drive” (between Prairie Avenue and Crenshaw Boulevard) on this page, this section and where applicable throughout the document.

RESPONSE 5.26

Comment noted. A footnote will be added at the end of the third sentence on Page II-1 to note that 90th Street is known as Pincay Drive between Prairie Avenue and Crenshaw Boulevard.

COMMENT 5.27**25. Pages IV.A.23 and 24 “Shade and Shadow Impacts”**

The discussion speaking to shade and shadow impacts and the “less than significant” impact representation needs more discussion. If the radius for shadows generated by the hotel on the proposed on-site residential uses ranges from 77 feet to 485 feet, will the discussed 20-foot buffer proposed between the hotel parcel and adjacent residential uses, and the “indirect” solar access provided by the buffer, actually mitigate the identified shade/shadow impact adequately? More substantive and practical discussion and mitigation measures are warranted to justify the “less than significant” impact representation.

RESPONSE 5.27

One of the main objectives of CEQA is to disclose to decision makers and the public the significant environmental effects of proposed activities that are defined as “projects.” CEQA Guidelines Section 15378(a) defines a “project” as “the whole of an action which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment...” Section 15360 of the CEQA Guidelines defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project.... The area involved shall be the area in which significant effects would occur either directly or indirectly as a result of the project.” Residential uses located within a 485 foot radius of the Hotel Parcel would be potentially affected by shade and shadows created by the hotel structure during the winter solstice. During the summer solstice, shadows from the hotel structure would have the potential to affect residential zoned properties to the north that are within a 77 foot radius of the Hotel Parcel in the Mixed-Use Zone. The extent of shading during the winter and summer months in terms of area and duration would be affected by the size of the hotel building footprint and the precise location of the hotel on the Hotel Parcel within the Mixed-Use Zone, which is not known at this time. While the proposed hotel may generate a shadow

on the on-site adjacent residential units to be developed within the Specific Plan, CEQA does not require this consequence of the Project to be identified or mitigated since the impact of the hotel's shadow does not effect the existing physical environment—rather, it is part of the Project itself. As noted in the Draft EIR on Page IV.A-22, shade and shadow impacts from the proposed hotel structure would not significantly impact any existing land uses in the Project vicinity.

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT 5.28

26. Page IV. I-31, “Trade Area Demographics...”

The discussion of what constitutes PTA (Primary Trade Area) West and PTA East is incomplete and appears to omit some information that would make the discussion of the submarket more understandable.

RESPONSE 5.28

Comment noted. The Additions and Corrections section of the Final EIR has been amended to clarify the description of the boundaries of the Primary Trade Area (PTA) described on Page IV. I-31 of the Draft EIR. The Primary Trade Area (PTA) is bounded roughly by West Florence Avenue on the north, West El Segundo Boulevard on the south, the San Diego (405) freeway on the west and the Harbor (110) freeway on the east. This Primary Trade Area is further subdivided between PTA West and PTA East. Western Avenue is the dividing line between PTA West and PTA East. The area of the PTA to the west of Western Avenue is “PTA West” while the area of the PTA to the east of Western Avenue is “PTA East.”

COMMENT 5.29

27. Page IV. M-3 (Environmental Imparts)(sic)

In the second sentence of this section amend “shard” to “shared.”

RESPONSE 5.29

Comment noted. The Final EIR will be updated to correct any typographical errors as noted. The entire Section IV.M, Parking has been revised and reprinted in this Final EIR.

COMMENT 5.30

28. Page IV. M-6, “Residential Parking Requirement”

In the second paragraph on this page there is a representation that “the minimum number of guest spaces for residential units... will be determined by the shared parking analysis.” This representation may cause unanticipated impacts. Unless visitor parking in your shared parking analysis exceeds the City's moderate one space for three unit requirement, your parking proposal may likely not address the demand.

Visitor parking for residential units is very different from parking demands for various commercial uses in mixed-use zone scenarios. Again, a little too vague. Additionally, the proposed number of on-street spaces juxtaposed with the parking provided in the mixed-use zone via the shared parking methodology is too vague. Again, may need to have the flexibility to require Planning Commission review and approval per certain thresholds that could be established.

RESPONSE 5.30

For guest/visitor parking for dwelling units built in the Mixed-Use Zone (as compared to the Residential Zone), the Specific Plan proposes the use of a shared parking methodology instead of the Inglewood Municipal Code standards. The Specific Plan provides a framework for buildout of the permitted land uses, with flexibility to determine the precise uses over time. It is not possible to provide a detailed plan for the precise number residential dwelling units that be built in the Mixed-Use Zone because the final mix will depend on market conditions. Once the precise number of units is known for the residential dwelling units built in the Mixed-Use Zone at the time of the submission of the Plot Plan Review application, a shared parking analysis will be submitted to support a determination of the actual amount of guest/visitor parking required based on the number of dwelling units built in the Mixed-Use Zone and the available supply of parking and the parking demand characteristics of other uses in the Mixed-Use Zone. From an environmental impact analysis, the Draft EIR discusses and discloses the impacts of implementing the Specific Plan as the Project, and based upon the shared parking methodology, no significant impacts are expected.

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT 5.31**29. DENSITY/LAND USE EQUIVALENCY PROGRAM**

Beyond the potential impacts, concerns, reasonableness, etc., for the equivalency program, there is likely to be considerable discussion regarding the flexibility you are proposing in favor of residential units.

RESPONSE 5.31

Each impact discussion in the Section IV, Environmental Impact Analysis, of the Draft EIR discloses the potential environmental impacts associated with utilization of the Equivalency Program. This comment notes that there is a policy decision inherent in the flexibility proposed by the Equivalency Program. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT 5.32**30. Page IV. M-6 “Residential Parking Requirement”**

In the third paragraph on this page there is a representation that “Parking for residential dwelling units

may utilize on-street or tandem parking...” that needs to be addressed in greater detail and provide sufficient justification why this will not foster congestion for residents.

RESPONSE 5.32

Comment noted. The first sentence in the third paragraph on Page IV.M-6 of the Draft EIR will be deleted. Section IV.M, Parking has been revised and reprinted in this Final EIR. Also, please refer to Response 6.1 for a discussion clarifying proposed Project parking. To be clear, only a limited amount of guest/visitor parking will be permitted on-street. As noted in Response 6.1, there are approximately 1,000 public street parking spaces in the Residential Zone. Given that the Specific Plan only permits a maximum of 50% of the required guest/visitor parking spaces to be on the street (i.e., 500 spaces), the remaining 500 street parking spaces would be available as an excess parking supply in the Residential Zone. The excess supply of on-street parking would help reduce congestion on the residential streets, since not every street parking spaces has been identified to serve a particular use.

With respect to the commenter’s concern regarding tandem parking, the Specific Plan has been updated to place additional limitations on tandem parking. Specifically, tandem parking may not be used to satisfy the required resident spaces for the Single Family Housing type, but could be used to satisfy up to 25% of the Townhome Housing Type and Wrap/Podium Housing Type.

COMMENT 5.33**31. PARKING**

There needs to be representations for the distance from parking spaces/areas to the subject uses. All residents should be able to access there spaces from reasonable, preferably relatively short distances.

RESPONSE 5.33

As provided in the Hollywood Park Specific Plan, parking for residents for all Housing Types, with the exception of Housing located within the Mixed-Use Zone, shall be 400' from the parking area to the entrance of the unit or lobby. For Housing located in the Mixed-Use Zone, parking spaces shall be 600' from parking to entrance of unit or lobby. These distances are within reasonable walking distance and would not create any adverse impacts on parking.

COMMENT 5.34**32. HANDICAPPED PARKING**

There should be substantive discussion regarding handicapped parking considerations.

RESPONSE 5.34

The Inglewood Municipal Code Section 12-57 provides requirements for handicapped parking. As

provided therein, handicapped parking spaces are included in the total number of required off-street parking spaces and shall not be required as additional parking spaces. The minimum number of handicapped parking spaces shall be determined by the total number of parking spaces provided on the site, in accordance with the following table:

Total number of parking spaces provided on-site	Handicapped Parking Spaces
1-25	1 (van-accessible space only)
26-50	2
51-75	3
76-100	4
101-150	5
151-200	6
201-300	7
301-400	8
401-500	9 (with 2 van accessible spaces)

For sites requiring 2 to 8 handicapped spaces, a minimum of one space shall be a van-accessible space. For sites having five hundred one to one thousand parking spaces, there shall be one handicapped space per each fifty parking spaces, including three van-accessible parking spaces, and for sites having more than one thousand parking spaces, there shall be twenty handicapped spaces, plus one handicapped space per each one hundred parking spaces, including one van-accessible space per each eight required handicapped spaces. The Project will comply with the applicable handicapped parking requirements.

COMMENT 5.35

33. PARKING

There is brief mention of visitor parking being factored into the shared parking analysis for the mixed-use zone. However, in Tables IV. M-2 and 3, there is mention of the required 404 spaces for the 202 residential units, but no mention of visitor parking. Having visitor parking for the residents possibly being a part of shared parking in the mixed-use zone could be an issue for the residents. Specifically, if the visitor spaces are proposed on a street.

RESPONSE 5.35

The information regarding guest/visitor parking in the Mixed-Use Zone is presented on line 13 of Tables IV.M-2 and IV.M-3 labeled "Residential Guest." The comment is correct that visitor parking is proposed to be included in the shared parking calculation. For example, visitor parking demand has a different peak than the other uses in the Mixed Use area, and consequently vacant spaces associated with these other uses could be utilized by visitors. As shown on line 13, the overall peak weekday shared parking demand for the sample program tenant mix is 6 parking spaces, while the overall peak weekend demand is 18 parking spaces. Depending on the final program and mix of uses, those amounts would change. The adequacy of shared parking supply to meet Residential Guest demand in the mixed-use area shall be

shown in the Shared Parking Study and is subject to City review and approval in the Plot Plan review process to ensure consistency with the standards in the Specific Plan.

COMMENT 5.36**34. Pages IV. M-8 and M-9, “City of Inglewood Parking Requirements”**

The text should be amended to speak to the City’s residential parking standards that require parking on-site; versus the Specific Plan proposal to provide a significant number of residential spaces on the street. For frame of reference and proper context, this section needs to be amended.

RESPONSE 5.36

As provided in Section 12-43(G) of the Inglewood Municipal Code, one additional parking space for visitors shall be provided on-site per every three units. The Specific Plan, unlike the IMC, proposes to permit a limited amount of the required guest/visitor parking in the Mixed-Use Zone to be on-street. A footnote will be added to Tables IV.M-2 and IV.M-3 to note that the guest/visitor parking factored into the shared parking study can be located within a parking structure, parking lot or on-street, and the section has been updated to reflect that on-street parking may be utilized for required guest/visitor parking. In addition, within the Residential Zone, on-street parking may also be used to satisfy a portion of required guest/visitor parking. However, at no point shall the total number of on-street parking spaces utilized for guest/visitor spaces exceed 50% of the total number of the available on-street spaces.

COMMENT 5.37**35. Page IV. M-10, (Valet Service)**

The “valet service” bullet creates an impression that valet service may occur and has been factored into your parking demand analysis. This may be minor, but this representation may give the wrong impression since valet parking is not actually a substantive part of the proposal. Therefore, you should specify how this was assessed and factored into your parking consideration.

RESPONSE 5.37

Valet service has not been factored in to the shared parking demand analysis, nor is it anticipated to be utilized as a means to provide code required parking. Valet parking is only anticipated to be utilized within the Mixed-Use Zone of the Hollywood Park Specific Plan area as an additional service for visitors to the project or to respond to unique, extraordinary or unanticipated project conditions. Valet parking may not be used as a means to supply required parking spaces, though it may be utilized to enhance the efficiency or convenience of required parking. For example, valet parking could be used at some of the restaurants in the Mixed-Use Zone as is customary. Additionally, valet service could also be utilized to alleviate possible shortfalls in parking during peak periods, such as busy weekends during the holiday season. The Shared Parking analysis does not factor in valet parking, and thus the benefits of the

potential use of valet parking is not reflected in the parking sufficiency assessment. Valet parking has the potential to increase the total number of parking spaces by maximizing utilization of the parking areas. Thus, the shared parking analysis presents a more conservative assessment of the impacts of the Project on parking. The location and operational characteristics of valet parking shall be determined as part of the Plot Plan review process, or a Minor Administrative Permit if a Plot Plan for the uses associated with the valet parking has already been approved.

COMMENT 5.38**36. Page IV. M-11, “Non-Captive Adjustment”**

Ensure that the “non-captive adjustment” is not too flexible. There is a reference in the section stipulating that you “recognized that any development without adequate parking may not generate business to its potential...” You need to mention that inadequate parking leads to impactful congestion, poor circulation, etc.

RESPONSE 5.38

As discussed on Page IV. M-11, non-captive adjustments help to account for those long-term parkers who are already accounted for within one user group, but also generate activity for a second land use. An example of this would be an employee of retail eating at a Quick Serve Restaurant on their lunch break. Another example would be a resident arriving to the commercial portion of the site by means other than a single-occupant vehicle for any trip. These residents may be walking to a restaurant for dinner, or to watch a movie. The resident group would also include teens who may work within the commercial development. When the exact program of uses is final, the non-captive adjustments would be calculated based upon the use characteristics of each proposed element of the program.

The Additions and Corrections section of the Final EIR has been amended as suggested by the commenter. Specifically, the final sentence of the second full paragraph on Page IV. M-11 will be revised to read as follows: “Recognizing that any development without adequate parking may not generate business to its potential and could lead to impactful congestion and poor circulation, the non-captive reduction was lessened to assure adequate parking.”

COMMENT 5.39**37. Pages IV. M-12 and 13, “Tables IV. M-2 and 3”**

For context and clarity, provide appropriate data in both tables to speak to the 40% and 32% reductions that are referenced.

RESPONSE 5.39

The parking ratios that project the peak parking demand for Hollywood Park were derived from ULI.

First, the unadjusted parking demand is established. The unadjusted parking demand uses ULI ratios that are based on occupancy counts from stand-alone land uses throughout the U.S. The ULI ratios also draw distinctions between employees (i.e. long term parkers) and patrons (i.e. short term parkers). Most land uses also generate different parking demands on weekends and weekdays so ULI has identified different parking demand ratios for each. The shared parking methodology uses adjustment factors such as modal split (i.e. adjustment that accounts for modes of transportation that a user group would likely use other than single-occupant vehicles such as rail, bus, carpooling, walking etc.) and non-captive adjustments (i.e. an adjustment that accounts for a parking reduction for users of the site already parked and accounted for by one land use utilizing another land use on-site.) The 40% and 32% reductions referenced in the Comment capture the adjustments made to the unadjusted parking demand for the Project, as reflected in the sample program. Based on the parking demand projections for employees developed by Walker Parking Consultants, roughly 1,000 employees will be on the site during the peak period for weekdays, and about 750 on weekends. The entire development will contain roughly 3,000 residential units which will be tied to the commercial development through pedestrian friendly corridors. The reduction taken for non-captive adjustment for the sample program analyzed in the Draft EIR are shown in the tables below:

Hollywood Park Weekday Land Use/User Group	Actual Reduction		Hollywood Park Weekend Land Use/User Group	Actual Reduction
Community Shopping Ctr	31		Community Shopping Ctr	34
Employee	4		Employee	5
Fine/Casual Dining	13		Fine/Casual Dining	10
Employee	3		Employee	3
QSR	208		QSR	196
Employee	4		Employee	4
Cineplex	19		Cineplex	27
Employee	0		Employee	0
Meeting/Banquet	29		Meeting/Banquet	22
Residential Guest	0		Residential Guest	0
Office 25K to 100K sf	0		Office 25K to 100K sf	0
Employee	9		Employee	0
Grocery	27		Grocery	31
Employee	2		Employee	1
Casino	0		Casino	0
Employee	0		Employee	0
Market Square	0		Market Square	0
Employee	0		Employee	0
Subtotal Customer/Guest Spaces	327		Subtotal Customer/Guest Spaces	320
Subtotal Employee Spaces	22		Subtotal Employee Spaces	14
Total Parking Spaces	349		Total Parking Spaces	334

The unadjusted weekday shared parking demand presented in the Draft EIR is 5,832 spaces. In addition, it should be noted that the Shared Parking Study has been updated in the Final EIR. At the time the Shared Parking Study was conducted, the precise mixed-use program for the Project Site was still under development, so a sample program was utilized in the analysis. Subsequent to the Shared Parking Study (dated September 2007), the proposed mixed-use program was refined and certain land uses were removed from the sample program. Based on the updated analysis, the unadjusted weekday shared parking demand is 6,969 spaces. Employing the shared parking methodology, the shared parking demand yields a requirement for 4,100 spaces, which is a reduction of 41%. The unadjusted shared parking weekend demand is 7,310 spaces. Employing the shared parking methodology, the shared parking demand yields a requirement for 4,857 spaces, which is a 34% reduction. It should be noted that the final mixed-use program may change as the mix of uses in the retail/entertainment center is further refined.

COMMENT 5.40

38. Page IV. M-14, “Critical Needs/Management Concerns”

The overview for shared parking for mixed use references that “The overall shared parking could be reduced by roughly 100 spaces while only causing a projected shortfall in December and late December, and for only 2:00 p.m., 6:00 p.m., and 7:00 p.m. This shortfall could possibly be alleviated through the use of stacking vehicles utilizing valet parking. There is also the possibility that over time visitors to the site will begin to adjust to the site and utilize the available transit without affecting the vitality of the development.” The aforementioned sentences give pause to the methodology and associated assumptions. Although clearly speaking to a small, finite window, your analysis on one hand speaks to handling a short-fall with a proposal for businesses not yet contemplated and without staff/City knowing where the valet parking would actually be accommodated. Additionally, the closing sentence is more hopeful than actually providing a concrete proposal to mitigate the possible scenario discussed. Unfortunately, this type of analysis/overview appears often enough to warrant additional consideration in regards to your specific plan proposal to obtain conceptual project approval sans any required future discretionary reviews and approval by the Planning Commission.

RESPONSE 5.40

The purpose of shared parking is to avoid the adverse impacts of devoting too much area to underutilized parking, while maximizing land for other beneficial uses and avoiding parking shortfalls. The reference in the comment noting that a reduction of 100 spaces which would only cause a shortfall in December and late December for only 2:00 p.m., 6:00 p.m., and 7:00 p.m., was intended to highlight that using the shared parking demand analysis, parking provided could be reduced and there would only be a potential impact for the peak parking season (i.e. during the late December peak retail season). This suggests there is a sufficient buffer of parking for most conditions. The example noted by the commenter does not mean to suggest that the parking to be built by the Project per the Shared Parking analysis would actually be reduced by 100 spaces, but rather, what could happen if 100 less spaces were provided. As noted however, if additional parking is needed at peak times, valet parking would alleviate this potential impact.

In approving an application submitted for Plot Plan review, the Director of Planning and Building shall make a specific finding as to whether adequate parking is provided on the site, as required by the Specific Plan. This mechanism allows the Planning and Building Director to know how the entire parcel submitted for Plot Plan Review is parked, and based on the information presented, the Director must make a finding of adequate parking if the Plot Plan is to be approved. At that time, the Director could determine when or if valet parking would be required, as well as the location for that parking, if facts or parking studies suggest this measure is warranted.

COMMENT 5.41

39. Pg IV. M-14, “Critical Needs/Management Concerns”

In the fourth paragraph there is a representation that an analysis of driveways in the mixed-use zone would be provided as part of the Plot Plan Review Process to ensure adequate vehicle queuing to accommodate the anticipated demand. Again, this could be an issue in the future. Especially, when considered in the context of the two sentences that followed the aforementioned. The sentences are as followed: “Additionally, vehicle queuing within the City’s right-of-way is not anticipated to occur during peak hours due to the design of the Project’s Circulation Plan. Therefore, impacts due to vehicle queuing would be less than significant.” In the absence of any definitive plans it is, again, difficult to adequately assess to ensure that the City will not encounter future issues that will be difficult to mitigate.

RESPONSE 5.41

As discussed in Response 6.5 and Page IV. L-73 of the Draft EIR, the Project includes specific, required physical street improvements as part of the Project’s circulation design, that will become part of the City’s right-of-way. The Traffic Study proposes on-site and off-site project design features to provide additional capacity to facilitate traffic flow along Century Blvd. and Prairie Ave. adjacent to the project site. The recommended design features/physical street improvements include street widening and/or roadway restriping for additional turn lanes, traffic signal equipment modifications, installation of a right-turn overlapping signal phase, and installation of two new traffic signals.

Given that the Project will physically improve Century Blvd. and Prairie Ave. by adding right turn lanes along the Project’s frontage as per the Circulation Plan, the right turn lanes will be available at all entrances in Hollywood Park to lessen the potential for queuing that would interfere with the flow of traffic. This conclusion is reflected in the sentence referenced by the commenter.

In addition, the future development areas will contain as-yet to be designed driveways and accessways that will not be part of the City’s right-of-way. As provided in Section 5.3.4 of the Specific Plan, in approving an application submitted for Plot Plan Review, the Director of the Planning and Building Department shall make a specific finding to determine that adequate traffic queuing has been provided for the site, as required by the Specific Plan. Thus, if the driveways are not designed with adequate queuing, the Plot Plan cannot be approved.

COMMENT 5.42**40. Page IV. M-15**

In the first line of the second paragraph, change “measure” to “measures.”

RESPONSE 5.42

Comment noted. The Final EIR will be updated to correct the typographical error noted by the commenter. Specifically, the first sentence in the second paragraph on Page IV. M-15 of the Draft EIR will be amended to read as follows: “All Project Design Features and/or recommended mitigation measures to minimize parking impacts under the Proposed Project would be implemented under the Equivalency Program.”

COMMENT 5.43**41. Page IV. M-15, “Land Use Equivalency Program Impacts”**

This paragraph includes the following statement: “For any additional retail, office/commercial and hotel area, the Project Applicant would submit a shared parking study at the time of Plot Plan Review to generate the parking demand for the Project.” Later in the same paragraph the following is stated: “As with the Proposed Project, compliance with the Hollywood Park Specific Plan and Shared Parking Study will ensure that there is sufficient parking to meet the demand.” Clearly, both statements hopefully assume that the Shared Parking methodology will be approved. However, there is concern that if circumstances change significantly, it is reasonable to postulate that the future use of the approved buildings, may need parking that a “new” shared parking analysis years later may indicate is deficient. Again, this is a potential problem given there would be no opportunity for future discretionary review as the project is proposed. Also, it could lead to the City being “required” to approve inadequate parking for previously approved buildings/uses/etc.; OR not approving future uses because the parking is deficient which may lead to concerns that the City could “violate” the approved Specific Plan. Proper context is clearly illustrated by Section 5.31 (Purpose of Plot Plan Review) that stipulates that “The purpose of the Plot Plan Review is to assure that future development within the Hollywood Park Specific Plan is consistent with the intent, policies and requirements of the Hollywood Park Specific Plan... The Plot Plan Review shall consider only the specific vehicular and pedestrian circulation, emergency accessibility, layout, building... consistent with the Specific Plan requirements.” As stated previously, if unforeseen circumstances arise the City could be left with some challenging decisions that could impact the project or the City.

RESPONSE 5.43

If in the future additional retail, office or hotel space is added or there is a change of use, a new Shared Parking Study would be provided to the Planning and Building Director for review and approval as part of the Plot Plan Review Process. In approving an application submitted for Plot Plan review, the Director

of Planning and Building shall make a specific finding as to whether adequate parking is provided on the site, as required by the Specific Plan. If a use changes, parking must be provided in accordance with the regulations in the Specific Plan as applied to the new use. This mechanism allows the Planning and Building Director to know how the entire parcel submitted for Plot Plan Review is parked and based on the information presented, the Director must make a finding that there is adequate parking if the Plot Plan is to be approved. The Director would never be in a position to be required to allow inadequate parking.

COMMENT 5.44**42. IV. M-16 “Mitigation Measures”**

For this to be considered a viable mitigation measure it needs to include a statement that if at the time of Plot Plan Review it is deemed that adequate parking cannot be provided, the proposed use/building cannot be approved until such parking can be provided on-site.

RESPONSE 5.44

Under the requirements of the Specific Plan, in order to approve an application for Plot Plan review, the Director of Planning and Building must make a specific finding as to whether adequate parking is provided on the site, as required by the Specific Plan. This mechanism allows the Planning and Building Director to know how the entire parcel submitted for Plot Plan Review is parked and based on the information presented, the Director must make a finding that there is adequate parking if the Plot Plan is to be approved. This mitigation measures reinforces the requirement that a shared parking study and map showing the location of the parking spaces is a required item for submittal for Plot Plan Review.

COMMENT 5.45**43. Assessing Circulation and Signalization**

Ensure the study of all intersections from the 405 freeway, 105 freeway, Florence Avenue and the eastern edge of the City from Manchester Boulevard to Century Boulevard; all potentially leading to the subject site.

RESPONSE 5.45

The traffic analysis study area is comprised of those locations which have the greatest potential to experience significant traffic impacts due to the Proposed Project. Under standard traffic engineering practice, the study area generally includes those intersections that are:

- Immediately adjacent or in close proximity to the project site;
- In the vicinity of the project site that are documented to have current adverse operational issues; and

- Forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

In reviewing the traffic study area shown on Page IV.L-6 of the Draft EIR, the intersections selected for analysis are consistent with the criteria noted above. In consultation with the City of Inglewood Department of Public Works staff, a total of 66 study intersections encompassing five public jurisdictions were identified for analysis to evaluate the potential impacts generated by the Proposed Project. The study area included key intersections immediately adjacent to the site, intersections in the project vicinity that may have future operational issues and a relatively higher percentage of project-related turning movements (e.g., Prairie Avenue, Century Boulevard), as well as intersections located at important freeway ramp intersections (e.g., key on/off-ramp intersections at the I-105, I-405, and I-110 Freeways). Therefore, the traffic study area used in the Draft EIR was designed to identify and represent the potential significant traffic impacts related to the project.

As summarized on Page IV.L-52 of the Draft EIR, the following six study intersections were identified to be significantly impacted by the Proposed Project:

- Int. 18: La Brea Avenue/Centinela Avenue
- Int. 19: La Brea Avenue/Florence Avenue
- Int. 22: La Brea Avenue/Century Boulevard
- Int. 25: Prairie Avenue/Florence Avenue
- Int. 45: Crenshaw Boulevard/Manchester Boulevard
- Int. 47: Crenshaw Boulevard/Century Boulevard

The Draft EIR also identified project mitigation measures which would mitigate the project impacts to less than significant levels. Based on the geographic location of the significant impacts, the relative severity of the impact, and the lack of identified impacts at adjacent study intersections that were further out from the impacted intersections, it was determined that the inclusion of additional study intersections in the Draft EIR traffic study was unlikely to yield any additional intersections that may be potentially significantly impacted by the Proposed Project.

In response to this comment, additional analysis was undertaken at key intersections within the area specified by the commenter. Specifically, the following additional intersections were identified for analysis of potential significant traffic impacts related to the project:

- Inglewood Avenue and Florence Avenue
- Inglewood Avenue and Manchester Boulevard

- Inglewood Avenue and Hillcrest Boulevard
- Grevillea Avenue and Arbor Vitae Street
- Van Ness Avenue and Manchester Avenue
- Van Ness Avenue and Arbor Vitae Street-92nd Street
- Van Ness Avenue and Century Boulevard

With the exception of the Van Ness Avenue and Manchester Avenue intersection (located in the City of Los Angeles), all of the above intersections are located within the City of Inglewood. The additional traffic analysis included new weekday AM peak period, PM peak period, and Saturday midday peak period turning movement counts conducted at these intersections. In addition, the respective project and related projects traffic generation, distribution, and assignment from the adjacent study intersections are extended through these intersections. It should be noted that the additional level of service calculations also incorporated comments provided by the City of Inglewood regarding the updated Proposed Project and related projects traffic generation forecasts.

The results of the supplemental traffic analysis for these seven additional intersections are included in Appendix K-1 of the Final EIR. As summarized in the Revised Table IV.L-2 in the Revised Traffic Section of the Final EIR, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the proposed Hollywood Park Redevelopment project is not expected to create a significant impact at any of the seven additional intersections. Incremental but not significant impacts are noted at the intersections as presented in the Revised Table IV.L-2. Therefore, no additional traffic mitigation measures are required or recommended.

Also, the v/c ratios at the seven additional intersections are incrementally increased by the addition of traffic generated by the related projects. As shown in the Revised Table IV.L-2, application of the City's threshold criteria to the "Future Cumulative Conditions" scenario indicates that the cumulative developments in the project vicinity are not expected to create cumulative impacts at these intersections. Incremental but not significant cumulative impacts are noted as presented in the Revised Traffic Study. (see Section III, Additions and Corrections. The Revised Traffic Study is included at the end of that Section of the Final EIR).

COMMENT 5.46

44. GENERAL

The absence of plans makes it difficult to fully "assess" your proposal relative to the actual maximum uses/sizes the site can accommodate. This is really evident relative to parking, building location and open spaces scenarios.

RESPONSE 5.46

The Hollywood Park Specific Plan is designed to provide the land use framework for the redevelopment of the 238-acre Hollywood Park site with a mix of parks, retail, housing, entertainment, gaming, hotel and civic uses. The Specific Plan tailors development standards and design guidelines in an effort to create a cohesive, master-planned community. The Specific Plan allows for some flexibility to allow the plan to respond to market preferences in the long-term buildout of neighborhoods. But such flexibility is tempered by the development standards imposed, limitations on the quantity and types of land uses permitted, and the Plot Plan Review process, which requires the Planning and Building Director to make certain findings before development can take place on a particular parcel, including a finding that the final plans are consistent with the Specific Plan requirements. The open spaces in the Specific Plan have detailed design requirements that ensure that the ultimate development is consistent with the approved concepts.

Given the long-term buildout of the Project, it would not be possible to provide a detailed plan for what every building on the site would look like at this time. From an environmental impact analysis, the Draft EIR discusses and discloses the impacts of implementing the Specific Plan as the Project, and based on the framework presented in the Specific Plan, analyzes the maximum possible environmental impacts of implementing the Project on the existing community. Because the Specific Plan sets development standards and design guidelines, governing issues such as setback requirements, building materials to be used, and plant pallet, the decision-makers are presented with information to determine whether this framework would yield the type of project desirable for the City.

COMMENT 5.47**45. RECOMMENDATION**

Any vague, confusing, unanticipated, etc., issues that may arise (per City Administration) must be taken to the Planning Commission for consideration and resolution. This is one way some concerns can be “mitigated” that will not potentially compromise the City in its attempt to mitigate and correct unanticipated issues in the future.

If you have any questions regarding any of the comments contact you can contact me at (310) 412-5301.

Sincerely,

Sheldon Curry
Assistant City Administrator for Development
City of Inglewood

cc: Tim Wanamaker, City Administrator

RESPONSE 5.47

This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis. Instead the comment raises policy issues to be considered by the decision makers.

COMMENT LETTER No. 6

Wanda Williams
Acting Planning and Building Director
City of Inglewood
One West Manchester Boulevard
Inglewood, CA 90301
Dated 11/24/08
Received 11/24/2008

COMMENT 6.1

The following comments pertain to the review of the October 2008 Draft Environmental Impact report and Draft Specific Plan for the Hollywood Park Redevelopment Project:

DIER Comments

COMMENT: Section IV.M (Parking) indicates "...parking for residential dwelling units may utilize on-street or tandem parking, and guest/visitor parking may utilize on-street parking, although no street parking will be provided on major arterial streets. Residential parking for each unit within the Mixed-Use zone would be cordoned off from commercial parking areas to provide controlled access for residents for security purposes." How will parking on the street be physically cordoned off? If the development concept is to provide an open integrated style of development why would cordoned off street parking be discussed? Plans do not specify what streets would be cordoned off. If this is going to occur, did the traffic and land use sections consider the impact on residents, guests, air quality and traffic? If not, then the report should be revised to include a full discussion regarding these impacts.

RESPONSE 6.1

Parking spaces on the street will not be physically cordoned off and no streets would be physically cordoned off. The statement "Residential parking for each unit within the Mixed-Use zone would be cordoned off from commercial parking areas to provide access for residents for security purposes" refers to required residential parking for units located within the Mixed-Use Zone that have dedicated parking spaces within a parking structure. For example, assume that a mixed-use building with retail space on the first floor and dwelling units located on the 2nd and 3rd floors is constructed in the Mixed-Use Zone. To

the extent the parking spaces required to serve the retail and residential uses of that mixed-use building are constructed in the same parking structure, the parking spaces required for the residents of the mixed-use building would be physically separated from the retail parking spaces in the building, so that patrons of the retail uses could not access the residents' parking spaces. There are no impacts associated with the separation of the parking, and indeed it ensures the residential units always have their parking available.

In the Residential Zone of the Specific Plan, an estimated 1,000 parking spaces will be provided on the street. As in other urban environments that have a supply of on-street parking, this pool of street parking within the Specific Plan will provide 1) some parking for guests or visitors who are visiting residents living in the Specific Plan area, and 2) a surplus supply of parking.

Overall, the parking standards for the Project vary with the particular use, meaning that standards governing the amount of parking to be built depends on whether the land use is residential, retail, civic, casino, etc. Additionally, all parking required to support anticipated on-site development would be provided within the Project Site. This means that the Project does not rely upon the existing supply of parking surrounding the Project Site to meet the Project's parking demand; rather, the Project creates a supply of parking on its Site to meet the demand generated by the new uses on the Site.

Parking for the commercial and retail land uses will be provided with a combination of surface parking lots, structured parking lots and on-street parking spaces within the designated mixed-use land use plan areas (the "Mixed-Use Zone"). Parking in the Mixed-Use Zone is proposed to be provided on a shared basis, based upon the mix of uses and estimated parking demands. If residential uses are ultimately included in the Mixed-Use Zone, required parking for the residents would not share parking spaces with the commercial uses. However, guest/visitor parking would be part of the shared parking supply. Residential parking (including guest parking) located within the residential land use areas would not share parking spaces with commercial uses. Parking will be calculated by a formula based upon the number of bedrooms and types of units as specified in the Specific Plan. The precise number of resident and guest spaces for the residential units will be determined at the time of Plot Plan Review once the final product type and bedroom counts are known. Below, is a discussion of how parking will work in the Specific Plan area to further clarify the parking requirements for the Project. The Additions and Corrections Section of the Final EIR will be amended with these clarifications.

Required Resident Parking for Residential Units in Mixed-Use Zone

To the extent the development contains residential dwelling units in the Mixed-Use Zone (residential over retail), the required resident parking will be provided pursuant to the ratios in the Hollywood Park Specific Plan (Section 2.11.1.2) which is based on bedroom count. The required parking spaces will be located in a parking garage which is shared by the commercial uses on the site. To ensure the residents have dedicated spaces, a specific portion of the parking garage would be cordoned off with a security fence from general commercial parking to provide controlled access for residents. All required residential parking spaces will be provided in parking garages, and on-street parking will not count toward the required resident spaces. Per the Specific Plan, all required resident parking (i.e. not guest/visitor

parking) shall not be shared with retail or another type of use and shall be located within 600' of the entrance of a unit or building.

Required Visitor/Guest Parking for Residential Units in Mixed-Use Zone

To the extent the development contains residential dwelling units in the Mixed-Use Zone (residential over retail), visitor or guest spaces will be provided pursuant to the Shared Parking Study. Unlike the required residential spaces, visitor/guest parking spaces will be shared with the retail and commercial patrons. Since these spaces are shared with the spaces for commercial and retail patrons, they can be located anywhere within the Mixed-Use Zone, including on-street.

Required Residential Parking in Residential Zones

For dwelling units built in the residential zones, the required resident parking will be provided according to the ratios in the Hollywood Park Specific Plan (Section 2.11.1.1) which are based on bedroom counts. For the single-family housing type, each unit shall have two resident spaces, both within a garage. For studio and one-bedroom units within a Townhome or Wrap/Podium housing type, each unit shall have 1.5 resident spaces, one within a garage. This means that half of the studio and one-bedroom units will have one dedicated parking space, and the other half will have two dedicated parking spaces. For units with two or more bedrooms within a Townhome or Wrap/Podium housing type, each unit shall have two dedicated parking spaces, one within a garage. The required resident spaces utilize a combination of traditional garages (which are attached to the unit), surface lots and garages associated with condominium buildings. All required resident spaces shall be contained on-site. It is estimated that the required residential parking will comprise up to approximately 6,000 spaces.

Required Visitor/Guest Parking in Residential Zones

For dwelling units built in the residential zones, the visitor or guest spaces will be provided pursuant to the ratios in the Hollywood Park Specific Plan (Section 2.11.1.1). As provided therein, single-family homes on 3,500 sf lots shall have 1 guest/visitor parking space per unit. All other units within the Residential Zone shall have 1 guest/visitor space for 6 units provided off-street in a garage or in a parking lot or an on-site parking area, and another 1 guest/visitor space for 6 units must be provided either off-street, or by utilizing public street parking, or a combination of off-street and public street parking, for a total of 1 guest/visitor space per 3 units. If public street parking is utilized to satisfy a portion of the guest/visitor parking, at no point shall the total number of public street parking spaces so utilized exceed 50% of the total number of then available public street spaces. For example, if 30 dwelling units were developed in the Residential Zone and none of them were on a 3,500 sf lot, the Project would provide 10 guest/visitor parking spaces to accommodate the 30 dwelling units constructed. The guest/visitor spaces utilize a combination of on-site and on-street parking. These spaces can be located in parking garages for condominium buildings, in surface lots or on the street. There are approximately 1,000 public street parking spaces in the Residential Zone. If public street parking is utilized to satisfy a portion of the guest/visitor parking, given that the Specific Plan only permits a maximum of 50% of the required

guest/visitor parking spaces to be on the street (i.e. 500 spaces), the remaining 500 street parking spaces would be available as an excess parking supply in the Residential Zone. In total, it is estimated that the required on- and off-site guest/visitor parking for the residential zone will comprise up to approximately 1,000 spaces.

Required Patron Parking in the Mixed-Use Zone

Based on an updated shared parking analysis conducted for a sample mix of likely uses in the proposed Mixed-Use Zone (included in Appendix L to this Final EIR), the project would have a peak parking demand of approximately 4,857 parking spaces. As shown in the Conceptual Circulation Plan layout illustrated in Figure II-8 on Page II-19 of the Draft EIR, five (5) parking structures were analyzed for the Project. For the purposes of analyzing the maximum impacts related to noise and air quality in the EIR, it was assumed that all five parking structures would be built to their maximum capacity. Although this assumption yielded a maximum total of 7,778 spaces in the five parking structures, it is anticipated that the maximum parking required to meet the needs of the Proposed Project is significantly less. At the time of Hollywood Park Specific Plan Plot Plan Review for the Mixed-Use Zone, specific design and location of the parking will be presented for review and approval. The precise number of parking spaces required will be determined at the time of Plot Plan review through a shared parking study.

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

COMMENT 6.2

COMMENT: Section IV.M (Parking) indicates that “...This includes up to approximately 6,000 required resident parking spaces (typically in garages), 700 on-site parking spaces, and 1,000 on-street parking spaces.”

What does “typically in garages” mean? Will some of the spaces be unenclosed or in carports? How do the 6,000 required resident spaces differ from the 700 on-site parking spaces? Are the 700 spaces unenclosed? Would the 1,000 on-street parking spaces be co-mingled with commercial parking spaces to address overflow commercial visitors? How would commercial visitors be prohibited or deterred from using nearby residential street parking? Are the on-street guest parking spaces intended to serve residential and commercial uses?

RESPONSE 6.2

Required residential parking will be provided in one of the following ways: (1) traditional garage attached to the unit, (2) unenclosed surface lots, or (3) enclosed parking garage structures (i.e. in podium,

wrap or condominium buildings). The phrase “typically in garages” means that in general, required residential parking spaces would be in enclosed garages, but sometimes they may be in unenclosed surface lots.

The reference to 6,000 required resident spaces was in regard to the pool of parking for required, non-guest/visitor, residential parking. The 700 on-site spaces refers to the capacity to locate up to 700 spaces on-site in the residential areas, on top of the 6,000 spaces anticipated to be needed for resident parking. The 1,000 parking spaces refers to the pool of available on-street parking. In total, the residential zone could include up to approximately 7,700 parking spaces. This does not include parking that would be provided in the Mixed-Use Zone.

The on-street parking spaces in the Residential Zone are not meant to serve commercial users visiting the Mixed-Use Zone. On-street parking spaces located in the Residential Zone are intended for residential users, while on-street parking spaces located in the Mixed-Use Zone are intended for commercial users. While there is no physical barrier between the Residential Zone and the Mixed-Use Zone that would prohibit commercial users parking in the residential areas, the site plan and its characteristics would discourage such behavior. For example, parking garages are located in proximity to the major entrances into the Mixed-Use Zone (for the commercial users). Furthermore, a commercial user looking for parking would likely not travel far into the residential areas in search for on-street parking due to the required walking distance from the farther residential streets to the Mixed-Use Zone. Should some commercial users seek to park on the street in the adjacent residential areas closest to the Mixed Use Zone, there exists an excess number of on-street spaces to handle this situation. If, in the future, commercial parking in the residential zones becomes a problem, parking restrictions could be implemented, such as requiring visitor parking permits on streets in the residential zones.

COMMENT 6.3

COMMENT: I believe that the project may still lack sufficient on street parking because the document concludes that the project would be subject to a shared parking analysis. Section IV.M states “The land uses and quantities contained in the tables below are, therefore, not the precise program. However, the methodology used to derive the parking demand for this “sample program” would be similar to the methodology used for the shared parking demand analysis that will be submitted as part of the Plot Plan package.” This does not comply with what CEQA § 15378 requires. The project must be specific and the formulation of mitigation measures may not properly be deferred until after Project approval when a Plot Plan package is submitted; rather, “[m]itigation measures must be fully enforceable through permit conditions, agreements, or legally binding instruments.” 14 CCR § 15126.4 (a).

RESPONSE 6.3

The maximum parameters of the Project are specific and will not change. However, the precise tenant mix, and the characteristics of the various uses, will not be known until the Project builds out. The Specific Plan seeks to implement a shared parking methodology. Shared parking has been validated by

the Urban Land Institute Shared Parking manual and proven to be effective in projects across the country. The sample program was used as an illustrative example of how the calculation works. As part of the Plot Plan Review, the City would be able to review the shared parking analysis for the mixed-use buildings and determine if adequate parking is being provided. If not, in accordance with the Specific Plan, the Plot Plan would not be approved.

COMMENT 6.4

COMMENT: The alternative discussion of 3500 residential units states “...Alternative RU would generate more parking demand related to the additional residential units to be constructed on-site, but would generate slightly less demand in the Mixed-Use Zone because 50,000 sf less of office/commercial spaces would be developed.” The document needs to analyze project and alternative impacts in a manner or to a degree required by CEQA. According to CEQA, the focus of the alternatives analysis is on alternatives 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” (CEQA, 14 CCR 1516.6(c)). A range of alternatives that could feasibly accomplish most of the proposed project’s objectives may not be included. Would the construction of 3500 units feasibly accomplish most of the basic objectives of the project and avoid or substantially lessen one or more of the significant effects? What significant effects would be lessened or avoided? And if this is a feasible alternative why would parking be discussed in such a generalized fashion? If it can be reasonably concluded at this preliminary stage that an alternative is going to generate more parking demand, the consultant is compelled per CEQA to identify how many more parking spaces would be required. The same would apply to any other alternative that would generate more parking, more traffic, more air quality impacts, etc. This is what CEQA demands.

RESPONSE 6.4

Alternative RU 3,500 was selected as a possible scenario for future development to allow for increased residential development and more efficient use of the Project Site to further the objectives of the Merged Redevelopment Plan. Regional land use planning and policy goals favor the development of housing in areas that are jobs-rich. Because the Project Site is located in a jobs-rich area, Alternative RU 3,500 was analyzed to provide the decision makers with an alternative that would provide more housing than the Proposed Project so as to provide the information about the environmental impacts that would be necessary for meaningful public participation and informed decision making.

While the comment is correct in noting that the CEQA Guidelines section 15126.6(f) states that “the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project,” it is also important to note that “[t]he range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” (Section 15126.6(f)) Among the factors to be taken into account when addressing the feasibility of alternatives is “general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context)...” As discussed in the Draft EIR on page IV. H-21, the jobs-housing ratio for the entire South Bay region is

projected to increase, and the Final 2007 RHNA indicates that the SBCCOG region needs to provide 13,733 housing units during the January 1, 2006 to June 30, 2014 planning period. The creation of housing by the Proposed Project is consistent with the goals of the broader region to locate housing in close proximity to jobs (although technically inconsistent with the specific growth amounts allocated to Inglewood). Further, creating more housing is consistent with local Inglewood community housing goals and policies in the Housing Element of the General Plan by increasing the availability of homeownership opportunities, and increasing the supply of new housing units in a City with an aging housing stock.

Given these Inglewood General Plan policies and regional land use policies, Alternative RU 3,500 presents additional information to be considered by the decision makers when evaluating the merits of the Proposed Project so as to make a reasoned choice. Additionally, while the comment seems to imply that the level of detail needs to be similar to the discussion of the Proposed Project, the EIR need only discuss the alternatives in a manner to foster meaningful public participation and informed decision making. The alternatives discussion provides this level of detail, including additional quantitative and technical studies of noise, air quality, and traffic.

Precise parking figures for Alternative RU 3,500 would depend upon final bedroom counts. Nonetheless, because there are more residential units than in the Project, the total residential parking required would be greater. The actual size of the retail/commercial use would allow the Mixed-Use parking to be determined at the time of Plot Plan Review. In all cases, required parking must be provided or the Plot Plan cannot be approved.

With respect to the other Alternatives, qualitative and quantitative information was provided giving detail on the environmental impacts associated with parking, traffic, air quality, and noise. In fact, the technical appendices for air quality, noise and traffic addresses each of the Alternatives quantitatively.

COMMENT 6.5

COMMENT: The traffic study mitigation program may be insufficiently detailed to assure that impacts can be mitigated to a level of insignificance. The payment of a fairshare contribution to develop and enhance the City of Inglewood Intelligent Transportation System (ITS) or ATSAC at specific intersections is an “operational” measure and not a “physical” measure directed at improving physical roadway segment and intersection impacts. Although the fair-share payment is a requirement, the developer must go further and propose specific physical roadway or traffic improvements. Payment of the ITS fee in the absence of specific roadway improvements is not acceptable in terms of proposing long-term mitigation. There are specific California cases to support this. The traffic analysis fails to comply with CEQA §15378. The DEIR also fails to comply with CEQA Guidelines § 15126.4 requirements that “an EIR shall describe feasible measures which could minimize significant adverse effects... “ Additionally, the DEIR fails to comply with Guidelines Section 15126A(a)(1)(B), which stipulates that “Formulation of mitigation measures shall not be deferred until some future time.” The document must go further to evaluate alternative measures or schemes to avoid traffic roadway impacts. There are various traffic alternatives that could potentially reduce traffic impacts. However, I want to emphasize that

deferment of mitigation for five years, ten years, fifteen years is not meeting the mandates of CEQA. A project proponent must propose measures--alternative measures to address traffic impacts in the present tense--to avoid or lessen those conditions following project approvals. Operational measures or payment into ITS is deferment of mitigation measures and not a long-term strategy to quell deterioration of traffic roadway sections. One feasible alternative that could have been evaluated is the impact of creating on/off lanes to the 405 at Arbor Vitae or the creation of a partial rail connector from the 105 Freeway to the project. Are these feasible? The project consultant needs to evaluate these in relation to project goals and objectives. Even if these measures cause a delay in project implementation--if the delays are reasonable and allow the project to still be developed, CEQA requires that they be considered. Because there are intersections that cannot be sufficiently mitigated to a level of insignificance through operational measures, CEQA encourages the evaluation of physical measures including alternatives to lessen impacts. This project will potentially affect the entire roadway system in the City of Inglewood and in surrounding environs and therefore physical roadway improvements should not be considered as optional. These need to be included. The traffic study is not CEQA compliant.

RESPONSE 6.5

Although CEQA does not mandate the use of “physical” mitigation measures, it should be noted that the Project proposes a variety of physical traffic improvements. The project design features on pages Page IV. L-73 include physical street improvements as part of the Project’s circulation design which help alleviate traffic impacts as part of the Project. The Traffic Study proposes on-site and off-site project design features to provide additional capacity to facility traffic flow along Century Blvd. and Prairie Ave. adjacent to the project site. The recommended design features/physical street improvements include street widening and/or roadway restriping for additional turn lanes, traffic signal equipment modifications, installation of a right-turn overlapping signal phase, and installation of two new traffic signals. The following access points and intersections are proposed to be physically improved:

1. Prairie Ave. and Arbor Vitae St.,
2. Prairie Ave. and Hardy St.
3. Prairie Ave. and 97th St.
4. Prairie Ave. and Century Blvd.
5. Century Blvd. and Doty Ave.
6. Century Blvd. and Proposed Signalized Driveway, east of Doty Ave.
7. Century Blvd. and Yukon Ave.
8. Pincay Dr. and Carlton Ave.

In order to minimize the impact of traffic congestion and mitigate traffic impacts, the Project is proposing to implement Intelligent Transportation Systems (ITS) elements within specific highly-traversed corridors within the City, and to integrate these ITS elements with regional traffic management centers (i.e. Los Angeles County). ITS refers to a traffic signal control system for synchronizing the timing of any number of traffic signals in an area, with the aim of reducing stops and overall vehicle delay or maximizing throughput. Traffic signal control varies from systems that use historical data to fix the timing of signals, to timing plans for a network of signals according to real time traffic conditions. The Project proposes full funding and implementation of the ITS at certain intersections (please note—not “fair share”) to mitigate the Project’s traffic impacts. Thus, the mitigation is not simply payment of a “fee,” but the implementation of specified improvements. In addition, the Proposed Project also considered physical roadway improvements at these locations. The physical measures were found to be infeasible because they would require right-of-way acquisition, which would likely require condemnation proceedings, would displace current residents and businesses and would take a significant amount of time to accomplish, if the improvements could even be accomplished. On the other hand, the implementation of the ITS system does not pose the same downsides, can be easily implemented without instituting condemnation proceedings, and mitigates the Project’s impacts. It should also be noted that to make the ITS system most effective, the Proposed Project funds 19 intersections even though it only has a potential significant impact at six intersections. Funding ITS at the 19 intersections provides corridor improvements and improves traffic flow.

Cumulative development of the Project and the Related Projects are expected to create significant cumulative impacts at 27 study intersections during the weekday AM peak hour, PM peak hour, and/or Saturday mid-day peak hour (14 of which are located with the City of Inglewood). The Project’s cumulative impacts are being mitigated by fair share contributions at these intersections, or full funding of ITS for those intersections that are part of the 19 total intersections (and are also cumulatively impacted) being improved to provide corridor improvements.

California case law support the proposition that a fair share contribution is sufficient mitigation. For example, *Friends of Lagoon Valley v. City of Vacaville*, 154 Cal.App.4th 807 (Cal. Ct. App. 2007) involved a challenge to the EIR prepared for a mixed-use development consisting of 700,000 square feet of office space and up to 50,000 square feet of commercial uses; a 338 acre residential community, including 874 single family homes, 100 attached townhomes, and 54 affordable units in a mixed-use town center; open space preservation; and public uses such as a new fire station and roads. *Lagoon Valley*, 154 Cal.App.4th at 814. The Friends of Lagoon Valley claimed that mitigation measures proposed to address cumulative impacts to traffic were inadequate. *Id.* at 817. The EIR determined that the project would not individually result in significant traffic impacts but was expected to have cumulative impacts. *Id.* at 818. The EIR developed mitigation measures to address these impacts, but some of the impacts involved infrastructure within the jurisdiction of Caltrans. With regard to the payment of impact fees, the court found that the fees constituted a reasonable mitigation program and were adequate under CEQA because the fee would be paid toward specific improvements. *Id.* at 818.

Although the comment refers to mitigation being deferred, the mitigation measures provided are phased to correspond to the traffic impacts associated with each phase of development. The Hollywood Park Mixed-Use Project is a multi-phase, multi-year development project. Therefore, mitigation measures are phased over the life of the project and specifically correspond to each phase of development, and the traffic expected from that phase.

The commenter also suggests that the Draft EIR should have analyzed the creation of on /off ramps to the 405 at Arbor Vitae or the creation of a partial rail connector from the 105 Freeway to the Project. It should be noted that with the proposed mitigation measures discussed above, all project related and cumulative impacts are mitigated, so there is no need to analyze additional mitigation measures. Moreover, the two improvements suggested by the commenter would require large capital outlays, long-term design work and approvals from third party agencies that are well beyond the scope of the proposed Project.

COMMENT 6.6

COMMENT: The discussion of population growth is based on unsupportable data. Section IV H states “Although the City average household size per the 2008 RTP for 2015 is 3.32, the use of 3.0 persons per household is a reasonable and conservative household projection for planning purposes because it exceeds the average household size for nearby similarly developed housing tractsand likewise is similar to household figures used in the Playa Vista project.”

This project is not in the City of Los Angeles. The 2005 US Census Data, California Department of Census and Southern California Association of Governments demographic projections indicate that the average Inglewood household size is somewhere around 3.3. to 3.5. The use of a 3.0 average that is similar to Playa Vista should be removed from this document or explained more fully. Playa Vista is not located in Inglewood and there are not significant similarities in terms of surrounding land features including the Pacific Ocean. The use of a 3.3 versus a 3.0 household average factor significantly skews the population, employment, and related socioeconomic data. In the matter of CEQA, the California courts have consistently held that a consultant should err on the side of caution. Therefore a more conservative approach should be employed or detailed explanation and justification of a 3.0 average household size must be provided.

RESPONSE 6.6

The calculation of residents generated represents a reasonable and supported estimate for the project because the residential product types contemplated for the Proposed Project are anticipated to generate a smaller average household size, and are different from the larger single-family units and other housing products elsewhere in Inglewood. As shown in Table IV. H-1, the average household size for housing tracts with similar product types, in Inglewood, (i.e., Census Tracts 600703 and 600704) ranged from 2.04 to 2.49 persons per household. These Census Tracts are in the City of Inglewood and adjacent to the

project site, and also have surrounding land features like Playa Vista (i.e. urban setting, at a distance from the Pacific Ocean).

Of the types of units developed in Inglewood, the housing types in Census Tracts 600703 and 600704 are the most similar to the proposed housing types for this development, recognizing that the products proposed by this Project do not currently exist in Inglewood. Furthermore, as a base for comparison, Playa Vista was used because it is comprised of very similar product types to the Project (e.g., townhomes, condominiums, and attached product in an amenity-rich environment).

Typically, the average household size is determined based on forecasted conditions for the vicinity within which the project is located. Using a City-wide average would not produce a representative population forecast because of the substantive differences of the housing characteristics of the Proposed Project as compared to the City-wide average. Although the average household size per the 2008 RTP in the City of Inglewood is 3.32, this is a general average across the entire City which includes larger, traditional single family homes (approximately 40%). The use of 3.0 persons per household is consistent with the average household size of the project’s Census Tract. It is forecast in 2015 (the closest year to project build-out) that the average household size in Census Tract 600702 is 2.99 persons per household.

In addition, the use of 3.0 persons per household is consistent with the average household size for SCAG’s South Bay Cities Council of Governments (SBCCOG) subregion, of which Inglewood is a member city. As shown in the table below, the average household size in the SBCCOG subregion is 2.95, 2.97, 2.98, and 2.98 for the years 2005, 2010, 2015 and 2020, respectively. Since the Project would aid to serve the regional goals of creating more housing in the jobs-rich region, the population and housing growth projections for the region serve as another point of reference for assessing the assumptions presented in the Draft EIR. As shown, the use of 3.0 persons per household in the Draft EIR is not only consistent with the similar Census Tracts within the City and other neighboring jurisdictions with similar types of development, but it is also consistent with the growth projections for the South Bay region.

SCAG's 2008 RTP Population & Housing Projections for the South Bay Cities Council of Governments Region 2005-2020

Subregion	2005			2010			2015			2020		
	Pop.	DU	Ave. Hsld.	Pop.	DU	Ave. Hsld.	Pop.	DU	Ave. Hsld.	Pop.	DU	Ave. Hsld.
SOUTH BAY CITIES ASSOCIATION	891,217	302,069	2.95	913,323	307,091	2.97	934,399	313,990	2.98	952,277	319,699	2.98

COMMENT 6.7

COMMENT: The DEIR discussion of public parks needs to segregate active park land from passive park land. Does the lake include canoeing, fishing, swimming or other active recreational activities? If the lake

is primarily for scenic viewing, how can the DEIR purport that this provides an additional 2.4 acres per 1,000 people. Also did the park analysis consider employee use of the park areas? Once this occurs, would this still result in 2.4 acres per 1,000 people? The recreation discussion needs to clearly identify the amount of active park areas and the amount of inactive or passive park areas.

RESPONSE 6.7

CEQA thresholds of significance do not distinguish between active and passive park spaces. Indeed, best practices in urban planning now favor the development of parks and open space areas programmed for diverse activities, because different activities appeal to different populations and age ranges, and the goal is to access people from all different populations. Not only do you satisfy a wider range of public needs if there is a wide-range of park spaces, by drawing people of different ages and types to shared parks, it increases their use, the times they are occupied, and as a result, makes the spaces safer, and potential adverse impacts fewer.

For example, parks dedicated to active recreational uses (e.g. a park containing a soccer field) may only be usable by certain residents during day light hours, while a passive park may provide space for an evening artistic performance or contemplative spaces that would appeal to other segments of the resident population; both uses and park types are beneficial and would appeal to various population types. Both types of space fulfill recreational needs of future residents and the broader community.

The City recently adopted Ordinance 09-01 which establishes park land dedication, in-lieu fees and park development fees to serve the purpose of implementing the provisions of the Quimby Act contained in Section 66477 of the California Government Code. When adopting the Ordinance, the City found that the public health, safety, and welfare of the City would benefit from a balanced system of parks and recreational areas in which sufficient flexibility is allowed for a developer to receive credit for private park and recreation space, and private open space that provides an acceptable mixture of different type of recreational uses of land including such potential uses as the following: (1) active recreational use areas such as a children's play apparatus area, paved game concrete area, turf playfield, picnic area, community garden, dog park, running or walking trails, swimming pool, or recreation center building; (2) passive recreational use areas such as a landscaped park, public open space, or open space available only to the residents of the development, (3) special facilities open to the public such as lakes or golf courses, (4) special facilities only open to the residents of the development such as swimming pools and tennis courts, and (5) plazas and fountains in commercial areas open to the public.

Although the comment asked to segregate active park land from passive park land, both types of park spaces form a coherent master planned park system. Section 12-105.10(B) of the Ordinance recognizes the importance of both active and passive uses, and grants 100% credit for both provided that 40% of the total required land to which the developer may receive a credit must be for active recreational uses, unless the Planning Commission makes specific findings. Within the Specific Plan, Champion Park is designed for active and passive uses, including sedentary game tables, formal and terrace gardens, open lawn play areas, concerts and picnic spaces. Lake Park is designed for active and passive uses, including tot lot,

sand volley ball court, exercise par course, walking path, contemplation gardens and game areas. Arroyo Park is designed for active uses, including water play area for children, pedestrian trails, Bocce ball play area, putting green and exercise par course, to name a few activities. Bluff Park is designed for active and passive uses, including small and large dog parks, half-court basketball, soccer field, playground area, and community garden. Additionally, it has the community's HOA Club which contains the junior Olympic swimming pool and tennis courts. As required by the Ordinance, at least 40% of the land dedicated for park and recreational use in the Specific Plan contains active uses.

With respect to the lake in Lake Park, the lake does not include canoeing, fishing, or swimming. However, the newly enacted park dedication ordinance acknowledges the benefit of providing "special facilities" open to the public, such as lakes or golf courses. To that end, Section 12-105.10(B)(3) of the Ordinance provides that a developer may receive 100% credit for park land dedicated to special facilities such as lakes or golf courses, provided that the special facility does not exceed 25% of the total park land that must be devoted to the project, and the special facilities shall be restricted to its initial purpose and be permanently devoted or dedicated to use by the general public. The lake in Lake Park does not exceed 25% of the total park land that must be dedicated under the Ordinance. As such, the lake, is eligible for a 100% credit and thus is accurately factored into the calculation for the amount of parkland per 1,000 residents the Project provides.

The standard in the City's General Plan is based upon residents, not employees. While the EIR does not specifically discuss employees use of the park areas, the total system of parks created in the development would be available to the employees of Hollywood Park, as well as the community of Inglewood. Pursuant to the General Plan, the Open Space and Parks Element's primary goal is to provide recreational and park facilities for all residents in Inglewood. As such, the EIR analyzed the impacts to parkland based on resident population.

The commenter notes a park per resident ratio of 2.4 acres per 1,000 residents. This ratio assumed a maximization of housing using the Equivalency Program. At the base case of 2,995 units, the park ratio would be 2.8 acres per 1,000 residents. In addition, the City's new ordinance sets a standard of 3 acres per 1,000 residents, but at the same time, recognizes that certain types of plazas, fountains, and other commercial public spaces, can also serve residents in a mixed-use community. Consequently, the Project will also meet the 3 acre per 1,000 residents standard in the new ordinance pursuant to the Quimby Act.

COMMENT 6.8

COMMENT: Why does the DEIR use LA Unified School District Generation rates instead of Inglewood Unified School District Generation Rates to calculate student growth? Also are these numbers based on the population of 3.0 persons per household?

RESPONSE 6.8

Student Yield Rates (SYR) are the basis for determining impacts on schools from new development and

are defined as the number of students generated from each residential unit. The SYR is an independent ratio from the population per household factor. Government Code Section 65995.6 (a) requires that a school facilities needs analysis project the number of unhoused elementary, middle, and high school students generated by new residential units. The projection shall be based on the historical student generation rates of new residential units constructed during the previous 5 years that are of a similar type of units to those anticipated to be constructed. If no new development or if no new development of a specific product type took place within the district boundaries, it is permissible to go outside of the boundaries to look for comparable rates. Given the lack of comparable housing developed in Inglewood, the Draft EIR relied on Student Yield Rates from the Developer Fee Justification Study completed by Los Angeles Unified School District in February 2008. The study provides very current data and was based on a large sample of 23,395 units constructed in the last five years. These rates are the most appropriate for estimating impacts from the Hollywood Park project because they are provided in similar three dwelling unit product categories planned for in the Project: single family detached, single family attached (condominiums, townhomes) and multi family (apartments). Additionally, the Los Angeles Unified School District's jurisdiction includes urban areas similar to IUSD. The rates were transmitted to and reviewed by the Inglewood USD.

As stated above, the SYR, which is used to determine impacts on schools of additional students from new residential development, is based on the number of students historically generated by similar residential product types as proposed by a new development. In contrast, the estimated population generation rate of 3.0 persons per household is used to estimate the total number of residents to be added by a development, not just students. This factor is used to estimate the impacts on consistency with regional population and housing growth forecasts (Section IV. H. Population, Housing & Employment of the Draft EIR) and public services, including police, fire, parks and libraries (Section IV. K. Public Services of the Draft EIR).

COMMENT 6.9

COMMENT: CEQA Section 15126.6 does not require that an environmentally superior project be one that generates the "fewest adverse impacts." An environmentally superior project could result in fewer impacts than a proposed project but still create more impacts than a no project or other alternative scenarios. The alternatives should include feasible scenarios. Therefore, why wasn't a 2,200 or 2,500 residential housing unit scenario evaluated? The project alternatives were 800 dwelling units, 1,000 dwelling units and 3,500 dwelling units. Perhaps a more reasonable range of alternatives such as 1,500 dwelling units, 2,200 dwelling units and 2,500 dwelling units should have been evaluated to allow the developer to more reasonably approximate the original 2995 units. The range of housing units is too great between 1,000 and 3,500 to allow reasonable conclusions to be drawn.

Specific Plan Comments: None.

Ww: Hllywd Prk Cmmnts

RESPONSE 6.9

CEQA Guidelines Section 15126.6(a) provides that, “[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. 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. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” Typically, the “environmentally superior” alternative is considered the alternative with the fewest impacts as compared to the Proposed Project.

Based on this, a number of alternatives were considered and analyzed in the Draft EIR, including alternatives with various amounts of housing, so as to provide decision-makers a range of alternatives with respect to the density and intensity of development on the Project Site. From a planning and policy perspective, the development of more housing on the project site would be more beneficial because the project site is located in a jobs-rich area of Southern California. Locating housing closer to jobs helps reduce the VMT in the region, thereby promoting sustainable development and limiting use of constraint resources and regulating urban sprawl. To this end, alternatives with 800 units, 1,000 units, 3,500 units on-site were analyzed, in addition to an alternative that would allow for the maximization of housing, and in particular, affordable housing.

In analyzing the Alternatives, the Draft EIR provides some of the information that will likely be considered by the City in evaluating the advantages and disadvantages of the Proposed Project and the Alternatives. Pursuant to CEQA Guidelines Section 15166.6(f)(1), “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, satisfaction of Project objectives and whether the proponent can reasonably acquire, control or otherwise have access to an alternate site.” From an environmental impact perspective, the Project has significant and unavoidable impacts to Air Quality, Noise, Population/Housing, Solid Waste and Cumulative Traffic. Alternative RU 1,000, as analyzed, does not avoid any of the above listed impact categories and results in a significant and unavoidable impact to Population, Housing and Employment (Operational Employment Generation). No additional information would be gained by analyzing the development of a range of housing between 1,000 units to 2,995 units (e.g., 1,500 dwelling units, 2,200 dwelling units or 2,500 dwelling units) because those ranges would not avoid or eliminate impacts as compared to the Project. As such, additional alternatives would not give decision makers additional choices for development that would help reduce the environmental impacts of a project. Additionally, the Project furthers the City’s goal to encourage home ownership and increase the City’s housing stock. Furthermore, the Proposed Project with its mix of housing and commercial development is able to fund for the project’s design features, amenities, necessary public services (i.e., additional police and fire

services, and park land dedication and improvements) and infrastructure (i.e, public utilities, roadways improvements, traffic signal improvements). Given the level of proposed design features (see Page II-24 – Page II-34) and project amenities in the Proposed Project, developing an alternative with fewer housing units would likely require additional sources of revenue to fund the development, and it is unclear whether additional sources of revenue are available or financially feasible.

COMMENT LETTER No. 7

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(310) 412-5333
Dated 11/24/08
Received 11/24/2008

COMMENT 7.1

The areas pertinent to Public Works have been reviewed and comments are offered in regards to the following areas. Some of these comments were already provided, but were not responded to.

Documents reviewed-

Hollywood Park Redevelopment Project Draft Environmental Impact Report 10.9.08 Hollywood Park Redevelopment Project Draft Environmental Impact Report, Technical Appendices 10.9.08 (sic)

RESPONSE 7.1

This comment identifies the Department of Public Works and notes the documents that were reviewed as part of their review. All of the specific comments within this letter are addressed below.

COMMENT 7.2

1. Public Utilities

- a. Water: while the Water Supply Assessment (WSA) identifies the City's adjudicated ground water pumping rights in the West Coast Basin, the analysis notes that in FY 2007, the City only pumped 3,551.28 AF of its available 5,238.83 AF (4,449.89 + 788.94 carry over) of its rights, leaving 1,687.55 AF of unpumped water rights. While this has occurred, it is only pertinent to FY 2007. This is not indicative of the City's pumping

operation/history, nor does it offer the ability to dedicate this water amount for the project. Based on the current drought situation, the Metropolitan Water District (MWD) has already announced that water allocations (reduction) are to be expected in the imported water supply. The City will be utilizing its ground water pumping rights to offset the MWD allocation to the maximum extent practical in order to meet its current and future water demands. Additionally, until full project build out (demand) is realized, the water distribution system will require additional maintenance to insure proper water system operations and that water quality standards/regulations are being held in strict compliance.

RESPONSE 7.2

As discussed on Page IV. J-3 in the “Regulatory Setting” section of Public Utilities, Water analysis of the Draft EIR, Senate Bill 221 (CA Gov’t Code Section 66473) requires, in part, that the water supplier verify in writing that a sufficient and reliable water supply be available prior to completion of development projects consisting of 500 housing units. There is no requirement that there be a specific water source “dedicated” to a project. Rather, prior to approving a proposed subdivision, a city or county must make a finding that there is enough water to serve the project during average, dry and multiple dry water years without affecting existing and projected water customers. The City meets its demand for water through local groundwater supplies and water imported from the West Basin Municipal Water District (which in turn secures its imported water from sources including the Metropolitan Water District). As discussed in the Draft EIR, there is sufficient water to supply the Project even in drought conditions.

A portion of Inglewood’s water supply comes from adjudicated groundwater rights that were part of a 1961 judgment resulting from litigation between California Water Service Company, et. al. and City of Compton. A Watermaster (the Water Replenishment District) administers and enforces the provisions of this judgment. Please see Page IV. J-2 for further discussion of the West Coast Basin Judgment.

As noted by the comment, and as provided on Page IV. J-27 of the DEIR, in FY 2007, “the City only pumped 3,551.28 AF of its available 5,238.83 AF (4,449.89 + 788.94 carry over) of its rights, leaving 1,687.55 AF of unpumped water rights.” Per a letter dated July 23, 2008 to the City of Inglewood regarding the replenishment, protection and preservation of groundwater supplies and quality in the West Coast Basin, the Watermaster noted that, “The West Basin is an adjudicated basin and therefore all pumpers in the Basin (which include the City of Inglewood and Hollywood Park) have the authority under the West Basin Judgment to pump their adjudicated rights.” (See Page IV. J-13 of the Draft EIR). The City, therefore, has the adjudicated authority to pump more water than it did in FY 2007, and, unpumped water is a source of water that is available to the City to meet demand. As required by Senate Bill 221, the Draft EIR provided the information noted in the comment to identify additional reliable sources of water. Further, as discussed on Page IV. J-27 of the Draft EIR, “This additional supply can be pumped from the City’s existing or already planned for wells due to the long-term reliability of groundwater supplies managed by the Water Replenishment District (WRD) of Southern California.”

Please see Page IV. J-27 for further details regarding WRD's management strategy for the West Basin groundwater supply.

The comment also notes that due to the current drought situation, the City will be utilizing its ground water pumping rights to the maximum extent possible to offset the reductions in MWD imported water supply. The Draft EIR acknowledges that the unpumped adjudicated water rights are an additional source of water supply to the City to meet demand, but it also discloses potential additional sources of water to meet the additional demand created by the Project. Page IV. J-27 identifies and discusses utilization of additional leased or purchased groundwater rights, a combination of the additional pumping and acquisition of additional water rights, and conservation, as additional sources of water available to the City.

With regard to the concern that until full buildout the water distribution system will require additional maintenance to insure proper water system operations and that water quality standards/regulations are maintained, the Project shall provide the City with revenue or funds necessary to pay costs to maintain the water system. In addition, the project infrastructure shall be phased such that construction of the water distribution system shall be coordinated with the associated development in a manner to minimize the maintenance issues identified by the commenter.

COMMENT 7.3

- b. Wastewater: sewage flows for the proposed project are to be collected via the proposed project infrastructure, where ownership is proposed to be transferred to the City. These sewage flows will then be conveyed to the Joint Water Pollution Control Plant (JWPCP) facilities in the City of Carson, owned and operated by the Los Angeles County Sanitation District (LACSD). Until full project build out (demand) is realized, the sewer collection system will require additional maintenance/monitoring to insure proper functioning and operation, and that the discharge standards/regulations are being held in strict compliance.

RESPONSE 7.3

The comment correctly notes as discussed on Page IV. J-35 of the Draft EIR, that the Project proposes construction of a new on-site sewer gravity system that would be connected to the local sewerage conveyance infrastructure that is located in right-of-way easements adjacent to the Project Site. These sewerage flows would then be conveyed to the Joint Water Pollution Control Plant (JWPCP) facilities in the City of Carson.

With regard to the maintenance/monitoring of the sewer collection system to insure proper functioning and operation and to ensure that the discharge standards/regulations are met, the Project shall provide the City with revenue or funds necessary to pay costs to maintain the sewer collection system. In addition, the Project infrastructure shall be phased such that construction of the sewer collection system shall be

coordinated with the associated development in a manner to minimize the maintenance issues identified by the commenter.

COMMENT 7.4

- c. Solid Waste: solid waste collection is provided to the City via contracted services from Waste Management. There will be significant demolition debris (pre-construction) and construction debris generated from this project. On-site material recycling is proposed that includes for materials such as concrete and asphalt. It does not address the air quality impacts (SCAQMD), nor does it address the method of how to address/mitigate or the impacts from disposal/recycle/transport associated with this.

RESPONSE 7.4

The comment correctly notes that the Project will generate demolition debris from construction activities, but as is disclosed on Page IV. J-55 of the Draft EIR, “Construction of the Proposed Project is anticipated to generate approximately 80,595 tons of solid waste, representing approximately 0.04 percent of the total available landfill capacity [at Puente Hills and El Sobrante Landfills].”

Additionally, as is suggested by the comment, the Project would implement an on-site recycling program that would include crushing and recycling asphalt and concrete materials on-site to the maximum extent feasible. See Page IV. J-55 and Project Design Feature J.4-3 for further discussion regarding the on-site recycling of demolition debris.

The comment incorrectly states that the Draft EIR does not address the air quality impacts of on-site recycling. As recognized on Page IV. J-58 of the Draft EIR, the Project Design Features related to Solid Waste have been incorporated into the Project Description and were used in the formulating the environmental analysis of the Project. As noted above, the Project includes a Project Design Feature related to on-site recycling of demolition debris (PDF J.4-3). Because on-site recycling of demolition debris is part of the “Project,” its impacts were taken into account in the discussion of Air Quality impacts analyzed in Section IV. B. Air Quality of the DEIR.

The Additions and Corrections Section of the Final EIR will be amended to note that on-site recycling is included in the first phase of construction. Specifically, under the heading “Construction Phase Impacts” on Page IV. B-23 of the Draft EIR, the second sentence of the second paragraph will be modified to read as follows: “The first phase would include: (1) demolition of existing structures and on-site recycling of demolition debris, (2) grading and excavation, (3) construction works traveling to and from project sites, (4) delivery and hauling of construction supplies and debris to and from project sites, (5) fuel combustion by on-site construction equipment, (6) the application of architectural coatings and other building materials that release VOC, and (7) asphalt paving.”

COMMENT 7.5

- d. Storm Drain: the proposed project is located within the Dominguez Watershed, in which all generated/collected project storm water flows are located within this watershed, and hence all flows convey to this channel. The Los Angeles Department of Public Works, Flood Control Division (LACDPW) operates and maintains this channel. All flows would have to be compliant with the National Pollutant Discharge Elimination System (NPDES) and the Municipal Separate Stormwater Sewer System (MS4). The project proposes to collect all storm water flows via a local storm drain system, and then construct a connection to LACDPW facilities to ultimately convey all project storm water flows to Dominguez Channel. The local storm drain system is proposed to be transferred to the City for ownership and maintenance.

RESPONSE 7.5

As provided on Page IV. F-27 and as noted in the comment, the construction activities associated with the Project would be required to obtain and comply with the requirements of an NPDES statewide General Construction Activity Permit. Please see Page IV. F-27 for further discussion of compliance requirements associated with the NPDES permit.

The comment summarizes the environmental setting of the Project and the existing and proposed connections to the storm drain system, but does not raise any issues with respect to the environmental impacts of the Project to the storm drain system.

COMMENT 7.6**2. Traffic/Transportation - *These comments pertain to the Technical Appendices portion of the DEIR.***

- a. Page 9: A new signalized intersection will be created 500 feet west of Yukon along Century Boulevard. How will this intersection impact the progression of vehicles along Century Boulevard which is a heavily traveled roadway? A minimum of one driveway and up to three more driveways will also be provided along Century Boulevard. These driveways will be limited to right turn in and right turn out. Will deceleration lanes be provided at each driveway?

RESPONSE 7.6

The new signalized intersection on Century Boulevard, as referenced by the commenter, will be located approximately 800 feet west of the Yukon Avenue intersection and approximately 600 feet east of the Doty Avenue intersection. The proposed traffic signal will accommodate and serve all vehicular and pedestrian movements at the intersection. As shown in Table 10-1 on Page 90 of the Traffic Impact Study (Appendix G-1) and Table IV.L-2 on Page IV.L-39 of the DEIR, this intersection is expected to

operate at a good level of service (Level A (Weekday AM) and Level B (Weekday PM and Saturday)) in the future with project conditions during the weekday AM peak hour, weekday PM peak hour, and Saturday Midday peak hour analysis conditions. In addition, the proposed traffic signal is not anticipated to disrupt signal progression and vehicular flow along the Century Boulevard corridor based on the proposed location in relation to the Doty Avenue and Yukon Avenue signals because signal synchronization will be provided along Century Boulevard. Further, the proposed project has also proposed to provide funding to continue development and enhancement of the City's Intelligent Transportation System (ITS) at various locations within the City, including signalized locations along Century Boulevard between the 405 Freeway and Van Ness Boulevard, for traffic signal synchronization. This synchronization will also aid signal progression and vehicular flow along the Century Boulevard corridor.

The other proposed project driveways, as noted in the comment, will be limited to right-turn in and right-turn out only operations. It should be noted that as part of the proposed Project Design Features, the project proposes to increase vehicular capacity on Century Boulevard by widening the north side of Century Boulevard along the entire Hollywood Park project frontage to accommodate an additional travel lane. This additional travel lane will function as a deceleration lane (for project inbound traffic) as well as an acceleration lane (for project outbound traffic) at all of the project driveways along Century Boulevard. Please see Page IV. L-73 of the Draft EIR for a complete description of the Project Design Features regarding widening the north side of Century Boulevard along the Project's frontage.

COMMENT 7.7

b. Page 25, Table 5-1:

- i. Were traffic counts taken when the race track was in session? The track is closed on Mondays and Tuesdays, and has a season of April to Mid-July and again November-December. However, some counts were taken on Tuesdays in September and October when we believe the race track was not in session. Therefore, no trip credits should be taken because of track removal if these counts are used as base conditions.

RESPONSE 7.7

Existing traffic counts at the study intersections were conducted during typical weekday and weekend conditions in September and October (i.e., 52 of the 66 study intersections). Weekday and weekend traffic counts associated with the remaining 14 study intersections were conducted in late June and early July. Although the Hollywood Park Racetrack does not have scheduled live horse racing events during the September and October time periods as noted by the commenter, it is important to note that the Hollywood Park Racetrack remains open year round for off-track betting and satellite wagering for horse racing events held at other racetrack facilities. Since off-track betting and satellite wagering will continue

as part of the Project's operations, traffic counts reflecting this component were needed for the traffic analysis.

Based on information provided by the racetrack operator, on days without live horse racing at the Hollywood Park, the racetrack typically attracts approximately 2,000 weekday patrons and approximately 3,500 weekend patrons for off-track betting and satellite wagering. As a result, it is reasonable to assume that the traffic count data for the Project conducted during September and October time periods reflects similar off-track betting and satellite wagering attendance levels at the Hollywood Park Racetrack. Refer to Appendix B-1 of the Traffic Impact Study (Appendix G-1 of the Draft EIR) for the traffic count data and racetrack attendance summary associated without live horse racing during typical September weekday and weekend conditions.

However, in light of the comment provided regarding racetrack attendance levels and the follow up coordination with the City of Inglewood, an updated traffic impact analysis has been prepared utilizing the 85th percentile racetrack attendance as recommended by the City's traffic consultant for trip generation credits to be applied to the Proposed Project (refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis). Based on a review of the racetrack attendance records from 2000 to 2006 (as summarized in Appendix B-2 of the Draft EIR Traffic Impact Study), the 85th percentile attendance represents approximately 8,700 weekday and 12,200 weekend attendees.

In addition, to address the comment's concern regarding taking trip credits for live horse racing on traffic counts that were taken on Tuesdays in September and October when live racing was not in session, a supplemental analysis has been prepared in which traffic volumes at the 52 off-site study intersections were adjusted in the future baseline analysis condition to reflect live horse racing at the Hollywood Park Racetrack. As noted above, existing traffic counts for 14 study intersections (i.e., those intersections located immediately adjacent to the Hollywood Park project site) were conducted in late June and early July and thus coincide with live horse racing at the Racetrack; therefore no adjustments were necessary at these 14 intersections.

Based on racetrack attendance records, the traffic counts at the 14 intersections were conducted on live horse racing days where the approximate attendance was 3,400 weekday patrons and 12,800 weekend patrons. For a consistent comparison, traffic volumes in the supplemental analysis at the 52 off-site study intersections were adjusted accordingly to also reflect live horse racing with approximately 3,400 weekday and 12,800 weekend attendance. It should be noted that this supplemental analysis also reflected the updated traffic impact analysis based on other City of Inglewood comments (refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis).

The trip credit is not meant to be a deduction to reflect the baseline conditions on the days the counts were taken. Rather, the credit for existing racing use reflects the fact that racing traffic fluctuates considerably with time, seasons, and other factors. The credit taken represents a portion of the traffic that could be generated by the racetrack at full-capacity when racing is in session. Racing attendance varies greatly, so the credit was based on a review of long-term attendance records and an estimate of the trips associated

solely with track attendance. As part of the supplemental analysis, the credit for existing racing was revised to reflect a reduction in the attendance level assumed in the credit (See Response [20.3]).

The results of the supplemental analysis, including the revised attendance credit, are included in Appendix K of the Final EIR. As summarized therein, the intersections impacted under the supplemental analysis are the same study intersections already identified in the Draft EIR Traffic Impact Study as significant impacts. In addition, the proposed project design features and mitigation measures and cumulative mitigation measures as identified in the Draft EIR Traffic Impact Study will also mitigate the project and cumulative project impacts to levels of insignificance under the supplemental analysis.

Since the results of the supplemental analysis do not result in any new significant transportation impacts, the conclusions disclosed in the Draft EIR Traffic Impact Study remain valid.

COMMENT 7.8

- ii. Some of the counts (13 counts) were taken on June 28. Were schools in session during the time these counts were taken? If not, then the traffic analysis based on these counts does not reflect typical on-street traffic conditions, and should be deemed inadequate.

RESPONSE 7.8

Existing weekday traffic counts at 14 of the study intersections (located immediately adjacent to the Hollywood Park project site) were conducted on Thursday, June 29, 2006. Although local schools were not in session on this day, the intent of conducting traffic counts for those study intersections surrounding the project site was to capture traffic conditions during live horse racing at Hollywood Park.

To address the concern raised in the comment, supplemental weekday AM and PM peak period traffic counts at these 14 study intersections have recently been conducted when local schools were in session. A supplemental traffic analysis for these 14 study intersections was then prepared but with the recent traffic count data. It should be noted that the supplemental analysis prepared for these 14 study intersections also reflected the updated traffic impact analysis based on the city of Inglewood comments (refer to Response 20.3 for a discussion of the updated traffic impact analysis). The results of the supplemental traffic analysis for these 14 study intersections are included in Appendix K of the Final EIR. As summarized therein, no additional project-related impacts (besides those already identified in the Draft EIR Traffic Impact Study) result in the supplemental analysis. In addition, no additional cumulative impacts (besides those already identified in the Draft EIR Traffic Impact Study) result.

Since the results of the traffic analysis utilizing the supplemental traffic count data do not result in any new significant transportation impacts, the conclusions reported in the Draft EIR Traffic Impact Study remain valid.

COMMENT 7.9

- iii. Was the track in session during the time (peak count time of 11 am - 2 pm) when Saturday counts were taken and were used for Saturday analysis? These were taken in July 1, 2006, September, October and January.

RESPONSE 7.9

Existing Saturday traffic counts were conducted at 14 of the study intersections located adjacent to Hollywood Park on July 1, 2006, coinciding with live horse racing at the Racetrack (with approximately 12,800 patrons). Saturday traffic counts at other study intersections were conducted mostly in September when no live horse racing events were scheduled at the Racetrack. Although live racing events on Saturdays did not occur during the peak count time of 11 am – 2 pm, the track was open for off-track betting and satellite wagering. Counts were taken at different times to try to determine the trips associated with each use. Refer to Response 7.7 for a discussion of the Hollywood Park Racetrack being open year round for off-track betting and satellite wagering for horse racing events held at other racetrack facilities and for general racetrack attendance levels during these time periods. As further described in Response 7.7, a supplemental analysis prepared with the future baseline conditions of the study intersections adjusted accordingly to reflect the same attendance level as those 14 study intersections where counts were conducted during the 12,800 attendance live horse racing show there would be no new impacts.

COMMENT 7.10

- c. Page 35: All trip generation estimates were developed using the regression equations. The housing component was not based on the number of units (2995) that will be built but on 600 units using the average rate. No technical backup for this method was supplied.

RESPONSE 7.10

Refer to Response 9.84 for a discussion on how the ITE trip generation fitted curve equations were utilized to develop trip generation rates for the Project's proposed residential use. Refer to Table 6-1 on Page 36 of the Traffic Impact Study (Appendix G-1 of the Draft EIR) for the ITE fitted curve equations for the proposed residential use and the resultant project trip generation rates. The trip generation rate was lower than what have been derived using the ITE average rate.

COMMENT 7.11

- d. Page 39:
 - iv. Existing uses to be removed. An estimated 10,000 patrons on weekdays and 15,000 patrons on weekends were assumed for the trip generation of the

Hollywood Park Track component. Appendix B-3 was unavailable for review to check the methodology.

RESPONSE 7.11

All technical appendices of the traffic impact study were submitted as references to the DEIR and are part of the administrative record. Refer to Appendix B-2 of the Traffic Impact Study (Appendix G-1 of the DEIR) for the Hollywood Park Racetrack weekday and weekend daily attendance records. Refer to Appendix B-3 to the Traffic Impact Study for the methodology utilized to develop trip generation for the existing uses.

Based on other comments provided regarding racetrack attendance levels and the follow up coordination with the City of Inglewood, an updated traffic impact analysis has been prepared utilizing the 85th percentile racetrack attendance as recommended by the City's traffic consultant for trip generation credits to be applied to the Proposed Project (refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis). Based on a review of the racetrack attendance records from 2000 to 2006 (as summarized in Appendix B-2 of the Draft EIR Traffic Impact Study), the 85th percentile attendance represents approximately 8,700 weekday and 12,200 weekend attendees. The results of the updated traffic impact analysis prepared for the 85th percentile racetrack attendance are summarized in a Technical Memorandum, (prepared by LLG Engineers, dated February 14, 2009) and are included in Appendix K of the Final EIR.

As summarized in Table 6 of the Technical Memorandum, no additional project-related impacts (besides those already identified in the Draft EIR Traffic Impact Study) would result in the updated traffic impact analysis. In addition, no additional cumulative impacts (besides those already identified in the Draft EIR Traffic Impact Study) would result. As the results of the updated traffic impact analysis utilizing the 85th percentile racetrack attendance do not result in any new significant transportation impacts, the conclusions reported in the Draft EIR Traffic Impact Study remain valid.

COMMENT 7.12

- v. Driveway counts were taken during events and during nonevents to get the trip generation forecast for the Hollywood Track. Are these counts represented in the report?

RESPONSE 7.12

Refer to Appendix A of the Traffic Impact Study for the driveway traffic count data worksheets conducted with live horse racing at the Racetrack. Refer to Appendix B-1 of the Traffic Impact Study for the driveway traffic count data worksheets conducted without live horse racing at the Racetrack. Appendix B-3 of the Traffic Impact Study provides a table summarizing all the driveway traffic counts conducted during the various analysis time periods.

COMMENT 7.13

e. Table 6-2:

- vi. Weekday Trip Generation: Only a few of the studied counts were taken during the time when the track was operational. These counts do not reflect traffic conditions with track patrons and other track related traffic. Therefore, no trip credit should be allowed when analyzing these intersection operations. Backup for calculating pass-by trips and internal capture percentages should be provided. Pass-by trips reduction should not be applied at any project driveways and adjacent intersections.

RESPONSE 7.13

Refer to Response 7.7 for a discussion of the Hollywood Park Racetrack being open year round for off-track betting and satellite wagering for horse racing events held at other racetrack facilities and for a discussion of when the counts were taken and the trip credit. Response 7.7 also discusses the supplemental analysis prepared with the future baseline conditions of the study intersections adjusted accordingly to reflect the same attendance level as those 14 study intersections where counts were conducted during live horse racing.

As noted on Page 39 of the Traffic Impact Study (Appendix G-1 to the DEIR) and Pages IV. L-17 – IV. L-18 of the DEIR, the pass-by and internal capture percentages for the proposed project were developed based on methodology and equations contained in Trip Generation Handbook, An ITE Recommended Practice, published by ITE, June 2004. Internal capture adjustments refer to a reduction of external trips for mixed-use developments such as the proposed project. Because of the nature of multi-use, or mixed-use, project development land use components (e.g., interaction between the office, retail and residential uses), trip making characteristics are interrelated and some trips are made among the various land uses on-site. These internal trips are not generated on the external street system and can be made either by walking or by vehicles entirely on internal roadways without using streets external to the site. Pass-by trips are made as intermediate stops on the way from an origin to a primary destination without a route diversion. Typically, trip generation rates are derived from counts taken at the driveways of the various land uses. For many land uses, not all of the trips generated at the driveways represent new trips added to the roadways, due to pass-by trips. Pass-by trips are attracted from traffic passing the site on an adjacent street or roadway that offers direct access to the site. For example, a vehicle already traveling on Century Boulevard or Prairie Avenue may make an intermediate stop at shop in the retail area of the Project while on the way to its intended destination. This trip may not necessarily be generated by the land use in the Project, and therefore not a new trip that should be added to the number of trips estimated to be generated by the development of new land uses on the Project Site. This pass-by factor should be taken into account when devising a trip generation estimate for a development project.

Given this, based on the mixed-use nature of the land use plan for the Project, internal capture trip reduction adjustments were applied to each of the project land use components to account for the trip interactions between the various project land uses. For example, employees in the commercial/office component of the Project may choose to walk to lunch at one of the restaurants in the retail center of the Project. Or, a dinner patron at one of the restaurants in the retail center may walk to the cinema for a movie after dinner. These internal trips or not generated on the streets external to the site. Due to the land use plan and the mix of uses, an internal capture reduction is reasonable. The internal capture rates for the Project were estimated based on the methodology outlined in Chapter 7 – Multi-Use Development of the Trip Generation Hand Book, An ITE Recommended Practice, published by ITE, June 2004.

With respect to pass-by traffic, the adjacent roadways to the Project Site include Prairie Avenue and Century Boulevard. The pass-by traffic forecast is based on the methodology and equations contained in Chapter 5 – Pass-by, Primary and Diverted Linked Trips of the Trip Generation Handbook, An ITE Recommended Practice, published by ITE, June 2004. Based on the ITE guidelines, a 23% pass-by reduction adjustment was applied to the proposed retail component of the project during the weekday analysis conditions and a 26% pass-by reduction adjustment was applied to the proposed retail component of the project during the Saturday analysis conditions. No pass-by reductions are applied to any of the other components of the project.

Supporting information for calculating pass-by and internal capture percentages is included in the FEIR (see Appendix K-7 of the FEIR).

COMMENT 7.14

- vii. The ITE Trip Generation Manual provides a rate for Horse Race Track (ITE Land Use Code 452) based on Attendance. Using the ITE rates, the weekday AM peak hour trips would be 100 vehicles, PM peak hour trips would be 1,300 vehicles and Daily trips would be 10,900 vehicles. These numbers are significantly different than the credits applied for the race track in Tables 6-1 and 6-2.

RESPONSE 7.14

Site specific traffic counts based on actual live horse racing events held at the Racetrack were conducted at all of the Hollywood Park driveways during the weekday AM peak period (7:00 am – 9:00 am), weekday PM peak period (4:00 pm – 6:00 pm), and Saturday Midday peak period (11:00 am – 2:00 pm). Instead of using actual, site-specific data, the comment seems to suggest that the trip generation rates provided in the ITE Trip Generation publication for a Horse Race Track should be used. The data included in the ITE publication for this land use reflects only one observation and does not include weekend trip generation surveys or rates. Since the ITE rate was based only on one racetrack, it was logical to utilize actual, project site-specific information, because it would be more reflective of actual

operating conditions specific to the Hollywood Park site. Therefore, trip generation credits associated with the existing uses to be removed were appropriately developed on this basis.

In addition, the traffic count data conducted at all of the Hollywood Park driveways included traffic associated with the Racetrack as well as traffic associated with the Casino/Off-Track Betting component (as it would be difficult to separate traffic associated with the two components given the design of the project driveways). As a result, the trip generation credits taken in the Traffic Impact Study, and as noted by the commenter, included traffic associated with both the Racetrack attendance as well as the Casino/Off-Track Betting component of the project. However, the trip generation forecasts calculated by the commenter utilizing ITE trip generation rates for Horse Race Track only apply to the racetrack component.

COMMENT 7.15

- f. Table 6-2 and 6-3: If the Casino is fully operational and will only be relocated why is it shown in the trip generation table since no new trips will be generated? Was the Casino in operation during count times?

RESPONSE 7.15

As discussed in the DEIR in Section II. Project Description, Page II-8, the proposed Hollywood Park Redevelopment Project consists of the demolition of most of the improvements and structures on the Project Site. However, the Casino will be renovated at its existing location on the Project Site—not relocated as stated by the commenter.

Since the Casino is an existing use, and will remain as one of the land uses on the redeveloped Project Site, the weekday and weekend project trip generation forecasts, as shown in Tables 6-2 and 6-3 of the Traffic Impact Study (Appendix G-1 of the DEIR), appropriately incorporated traffic of the Casino/Off-Track Betting component first as a new use and then subtracted it as part of the overall existing uses to be removed. Using this methodology, no net new trips were generated from the Casino/Off-Track Betting component.

Refer to Response to 7.14 for a discussion of traffic data at all of the Hollywood Park driveways, which includes traffic associated with the Racetrack as well as traffic associated with the Casino/Off-Track Betting component. It should be noted that the Casino/Off-Track Betting component has been and will continue to be open to the public every day of the year.

COMMENT 7.16

- g. Related Projects: Trip Distribution: How was the related projects distributed through the network? Was a local model used? Or, was it done by hand?

RESPONSE 7.16

Traffic associated with the related projects was assigned to the roadway system based on traffic distribution patterns which accounted for the related projects' land uses, existing traffic movements, and characteristics of the surrounding roadway system and nearby regional population and employment centers. A travel demand forecasting model was not utilized for to analyze traffic impacts from Related Projects to the Project.

COMMENT 7.17

- h. Related Projects: An internal capture of trips should be applied to all trips generated by large retail projects that are considered related projects. It should be done in the same manner as was used for Project trips.

RESPONSE 7.17

As discussed in the Traffic Impact Study (Appendix G-1 to the DEIR) and Pages IV. L-17 – IV. L-18 of the DEIR, the internal capture percentages were developed based on methodology and equations contained in *Trip Generation Handbook, An ITE Recommended Practice*, published by ITE, June 2004. Contrary to the comment, Page 86 of the *Trip Generation Handbook* states that “internal capture rates are not applicable and should not be used to forecast trips for shopping centers if using statistics and data for Land Use 820.” The Related Projects trip generation forecasts for all shopping center and retail land uses analyzed in the Traffic Impact Study were developed using the appropriate ITE Land Use Code 820. Therefore, internal capture adjustments were not considered appropriate for shopping center and retail land uses.

Typically, internal capture characteristics and reductions are applicable for mixed-use development projects consisting of retail, office, and/or residential land uses. The proposed Hollywood Park Redevelopment Project includes all three of these land uses. Therefore, internal capture reductions utilizing the procedures from the Trip Generation Handbook for the Project would be appropriate.

Based on a review of the list of Related Projects analyzed in the Traffic Impact Study, with few exceptions, most of the Related Projects consisted of one distinct land use, and therefore internal capture adjustments would not be appropriate. In addition, by not taking internal capture reductions for those few mixed-use development projects that are included in the Related Projects list, the overall traffic analysis was deemed to be more conservative in the evaluation of future traffic impacts since internal capture adjustments would have reduced the estimated traffic to be generated from these uses.

COMMENT 7.18

- i. General Comments: A project of this size (based on net trip generation) is expected to require a CMP analysis following Metropolitan Transportation Authority's CMP analysis guidelines. Although the report indicates in the introduction that it was based on CMP

guidelines as well, it was not explained why a future Year 2030 traffic analysis of key traffic locations was not performed as required by CMP guideline. This study only provides an analysis of Opening Year 2014 conditions, and therefore, it would be considered inadequate.

RESPONSE 7.18

The commenter incorrectly states the requirements of the Congestion Management Program (CMP) for Los Angeles County guideline regarding required future traffic analysis. The CMP does not specify the requirement for a Year 2030 traffic analysis. Specifically, Section B.5.2 - Selection of Horizon Year and Background Traffic Growth in Appendix B (*Guidelines for CMP Transportation Impact Analysis*) of the 2004 Congestion Management Program for Los Angeles County, states:

“Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.”

The Proposed Project is anticipated to be built-out and completed in Year 2014. Therefore, the Hollywood Park Redevelopment Project Traffic Impact Study (Appendix G-1 to the DEIR) adequately and appropriately analyzed Year 2014 traffic conditions pursuant to CMP requirements. In addition, the traffic mitigation is proposed to be phased in over the buildout of the Project.

COMMENT 7.19

- j. In addition to off-site traffic analysis and impact determination, the report should also include the following:
 - viii. An analysis of the on-site circulation system, verification of the proposed street classifications, geometric configurations and levels of service of key traffic locations.
 - ix. An analysis addressing the potential use of the interior circulation system by cut-through motorists seeking alternatives to avoid congestion along Century Boulevard.
 - x. An analysis of the access routes to the project’s commercial areas and the impacts of multiple driveways on a major arterial to access the proposed lots.
 - xi. An analysis of construction related traffic such as construction equipment, construction workers’ vehicles, haul trucks, material delivery trucks and a before-and after study to determine deterioration of existing roadways and mitigation measures.

RESPONSE 7.19

With regard to point viii., this analysis was included in the Draft EIR beginning on Page IV. L-47. Ten key internal study intersections were identified for analysis in the supplemental traffic assessment. The same project trip generation, traffic distribution and assignment methodologies utilized in the Traffic Impact Study were employed (i.e., the project traffic distribution patterns at each of the analysis locations along Century Boulevard, Prairie Avenue, and Pincay Drive were extended to the internal roadway system). All the internal study intersections are expected to operate at excellent levels of service (LOS A and LOS B) during the analysis time periods in the future with project conditions. As a result, it is determined that the proposed internal roadways and intersection geometric configurations will provide adequate intersection capacities to accommodate the future peak hour intersection traffic volume forecasts.

The design of the Project as a “smart-growth” mixed-use, infill development also aids to improve the internal circulation within the Project Site by concentrating neighborhoods and by bringing daily activities within walking distance of each other in an effort to reduce reliance on the private automobile, thereby reducing VMT. The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. The Project Site would contain a network of streets and paseos that connect the parks and plazas with retail, entertainment, residential, office and civic uses.

In addition to the intersection analyses, an internal roadway segment analysis was also conducted with average daily traffic (ADT) forecasts for each of the internal roadway street segments summarized. Also, the supplemental traffic assessment provides a display of the proposed internal roadway classification by street type (i.e., minor arterials, collectors, local streets). Based on a review of the future ADT forecasts in conjunction with the proposed street capacities, it is determined that the proposed internal roadways will provide adequate street capacities to accommodate the future daily traffic volume forecasts. See Figure IV.L-18 in the Draft EIR.

With regard to point ix., please refer to Appendix K of the FEIR for the supplemental traffic assessment which included a discussion of the internal roadways. The proposed roadways within the project site have been designed to accommodate project-related traffic. The internal roadways are not intended—nor would it be appropriate—to accommodate regional traffic (i.e., to by-pass arterial roadways intended to accommodate regional traffic such as Prairie Avenue and Century Boulevard). The goal of the Hollywood Park Specific Plan is to create a safe, walkable, pedestrian oriented village, with extraordinary open space, parkway, and recreational amenities. Indeed the connection between Pincay and Century is designed to be circuitous and slow to discourage cut-through traffic. In addition, the internal streets do not provide linkages to north/south through streets (as shown in Figure IV.L-17) due to the development north of the Project Site, which is gate guarded. On the eastern boundary of the Project Site, the internal streets would not connect to the adjacent neighborhoods due to the 45’ bluff and Bluff Park that create a

barrier. Therefore, it is unlikely that traffic would cut-through Hollywood Park. The traffic study indicates that project generated traffic will be fully accommodated with this configuration.

Alternative internal circulation plans were considered for the Proposed Project, including providing cut-through streets across the Project Site as depicted in Figures IV.L-16 and IV.L-17 in the Draft EIR. An internal circulation plan which included cut-through streets across the Project Site was determined to be unsuitable for the Project Site for several reasons. First, creating cut-through streets across the Project Site detracts from the walkability of the development and could lead to safety concerns resulting from pedestrians walking in the retail/entertainment area of the Project Site and vehicles cutting across the Project Site to quickly access areas adjacent to the Project Site. Also, the cut-through streets would not connect to the broader arterial street system, as shown in Figure IV.L-17 in the Draft EIR. As a result, cut-through traffic could be released onto existing residential neighborhood streets upon exiting the Project Site. This could result in unanticipated secondary traffic impacts to neighboring residential streets.

The Section E roadways within the site as described in the draft Specific Plan are designed to a typical Collector street standard (i.e., 40 feet of roadway width). This roadway section allows for one travel lane in each direction, and one parking lane in each direction. Section G1 and G2 roadways will provide the roadway width adequate to accommodate one lane of traffic in each direction, but will have no street parking. See Figure IV.L-17 in the Draft EIR.

The Circulation Element of the City's General Plan, does not specify dimensions for Collector streets, but indicates that a Collector street has a typical ADT capacity of between 3,000 and 10,000 vehicles. Based on an assessment of the expected usage of the internal roadways, some segments (e.g., the Sections G1 and G2 south of Pincay) include one lane each way and can accommodate the projected maximum ADT of 5,100 trips. Segments of the proposed extension of Arbor Vitae into the project site (shown as segment E in the Specific Plan) can accommodate the maximum projected ADT of 1,800 trips. Most of the remaining segments are forecast to accommodate less than 2,000 ADT. Therefore, the forecast segment ADT's are well within the capacity ranges described in the Circulation Element of the General Plan.

With regard to point x., as discussed in Section 3.0, Site Access and Circulation, of the Traffic Impact Study (Appendix G-1 to the DEIR) and as summarized on Page IV. L-42 of the DEIR, primary vehicular access to the Project will be provided via five existing signalized access points plus two proposed signalized access points. In addition, secondary driveways (limited to right-turn ingress and egress turning movement only operations) will also be provided to facilitate project traffic access. The multiple driveways proposed on Century Boulevard, for example, are designed to distribute project-related traffic for easier access into and out of the various parking areas. In addition, the Project proposes to increase vehicular capacity on Century Boulevard by widening the north side of Century Boulevard along the entire Hollywood Park project frontage to accommodate an additional travel lane. (Please refer to the Project Design Features on Pages IV.L-73 through IV.L-75). This additional travel lane will function as a deceleration lane (for Project inbound traffic) as well as an acceleration lane (for Project outbound traffic) at all of the Project driveways along Century Boulevard. Based on the future traffic volume forecasts as

well as the number and location of the primary and secondary access points in relation to the commercial parking areas, traffic flow and operations along the Century Boulevard and Prairie Avenue corridors are not anticipated to be significantly impacted. See Figure IV.L-16 in the Draft EIR.

With regard to point xi., Pages IV.L-58 through IV.L-61 of the DEIR include an analysis of construction traffic impacts. Table IV. L-5 on Page IV.L-60 of the DEIR provides a summary of project trip generation during peak construction activities. Based on the peak construction project trip generation forecasts, traffic impacts resulting from construction activities are forecast to be less than significant based on the City's significance criteria.

As documented in the Circulation Element of the Inglewood General Plan, Century Boulevard, Prairie Avenue, Manchester Boulevard, and Crenshaw Boulevard are designated truck routes in the Project's vicinity. The purpose of designated truck routes is to restrict heavy vehicles to streets constructed to accommodate such weights. In addition, based on the General Plan traffic volume flow projections (for year 2005), Century Boulevard was estimated to carry approximately 52,000 ADTs while Prairie Avenue was estimated to carry approximately 44,000 ADTs in the Project's vicinity. By comparison, the number of truck trips anticipated during construction grading/material export or final grading/structure construction time periods as presented in the Draft EIR represents only a small percentage of the ADTs on Century Boulevard and on Prairie Avenue which are designated truck routes in the City of Inglewood. Please see Response 18.10 for additional information regarding construction traffic trip generation.

COMMENT 7.20

- k. Based upon review of the traffic study and above comments, it appears that the Traffic Study prepared for Hollywood Park Redevelopment Project contains too many unresolved issues, many inaccuracies and is quite inadequate to support study findings that might render any project report and EIR prepared using the report invalid. Unless these issues (deemed fatal flaws) are resolved and the study is revised and updated with additional analysis and support information inclusive of all technical calculations, assumptions and methodology provided in a format and manner acceptable to all involved public agencies, it is only opinion that it would be very difficult for this project to move forward and avoid any potential legal challenges that might cause unnecessary delays, revisions, and potential risk of reduction and abandonment of some or all of the project components.

RESPONSE 7.20

The analysis and conclusion regarding the impacts to traffic and transportation from the Project, are supported in the DEIR by substantial evidence. Further, it should be noted that some of the statements raised by the commenter with respect to traffic impacts were not correct, misstated applicable guidelines and requirements, or misunderstood the analysis, data and information presented in the DEIR. Refer to the individual responses for further discussions. Additionally, supplemental analyses have been prepared

using the approaches as suggested by the commenter. The supplemental analyses will be included in the FEIR. Based on results of the supplemental analyses conducted, no additional project-related impacts and cumulative impacts (besides those already identified in the DEIR Traffic Impact Study) would result. As the results of the supplemental traffic analyses do not result in any new significant transportation impacts, and the conclusions reported in the DEIR Traffic Impact Study remain valid.

COMMENT 7.21

1. Additionally, while it was identified that there are potential development impacts, the impacts associated due to the off-site traffic improvement impacts/mitigations were not included or identified as part of the project impacts.

RESPONSE 7.21

As summarized in Section 10.4 (Project Mitigation and Project Design Features/Frontage Improvements), beginning on Page 97 of the Traffic Impact Study (Appendix G-1 to the DEIR), the Project Applicant proposes as its primary mitigation strategy the full funding (i.e., not fair share or proportionate share) to develop and enhance the City's Intelligent Transportation System (ITS) at 19 intersections. Any traffic signal equipment installation and/or upgrades in association with the proposed ITS improvements will be accommodated within the existing public right-of-way (ROW), or within the future public ROW along the proposed Hollywood Park project frontages. Therefore, secondary transportation impacts associated with the proposed ITS improvements are not anticipated.

For the six off-site study intersections identified to be significantly impacted by the project, the traffic analysis also includes review of alternate physical mitigation measures. As part of this review, potential secondary transportation impacts which may make these measures infeasible, such as restriction or elimination of curbside parking spaces, reduction or removal of raised median islands, substandard travel lane widths, and/or roadway alignment issues, etc., have been identified. Refer to Pages 97-101 of the Traffic Impact Study for a detail review of the proposed and alternate physical mitigation measures at the significantly impacted intersections. Similarly, for those locations where potential cumulative secondary impacts may occur (i.e., restriction or elimination of curbside parking spaces, roadway widening, right-of-way acquisition, etc.), the Traffic Impact Study identifies them as part of the analysis of cumulative traffic impacts. Refer to Section 12.1, beginning on Page 111 of the Traffic Impact Study, for a detail review of the proposed cumulative mitigation measures.

COMMENT LETTER No. 8

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One West Manchester Boulevard

Inglewood, CA 90301

Dated 11/24/08

Received 11/24/2008

COMMENT 8.1

1. Page IV.G-7. The conclusion that “Vehicular traffic is the primary source of noise in the project vicinity” may in fact be true but qualitatively dismissed peak hour and night-time noise and is based on assumed increases on Average Daily Travel and ambient noise measured only during the day. The noise generated by traffic during peak hours can be determined based on real traffic counts conducted by the traffic study. In addition aircraft noise at night appreciatively differs.

a. Page IV.G-7. Figure IV.G-2 Ambient Daytime Base Ambient Noise Level: measured only between 8:30 AM and 11 AM?

b. Page IV.G-13. Table IV.G-6. Assumed peak hour traffic at 10% of ADT.

RESPONSE 8.1

Mobile noise impacts are determined based on an incremental 24-hour noise level change. This is because the relevant land use/noise compatibility tables present guidelines in terms of 24-hour noise levels. The incremental change in noise level would be the same regardless of whether the CNEL or peak hour noise levels are used in the mobile noise analysis. Because of this, a peak hour table was not included in the Draft EIR. However, the Final EIR has been updated to clarify that the results presented in Tables IV.G-12 and IV.G-13 represent incremental changes over a 24-hour period.

In response to the concerns raised in the comment, peak hour and nighttime ambient noise level were analyzed, and the existing stationary noise impact conclusions contained in the Draft EIR were verified. Additional sound measurements were taken on December 16, 2008 to determine evening peak-hour and nighttime noise levels on roadways adjacent to the Project Site. These measurements indicated that evening peak hour (4:45 to 5:30 p.m.) noise levels along Prairie Avenue and Century Boulevard were 70.7 and 71.2 dBA Leq, respectively. Nighttime (10:00 to 10:45 p.m.) noise levels along Prairie Avenue and Century Boulevard were 57.5 and 58.8 dBA Leq, respectively. Ambient noise measurements capture the pervasive noise associated with a given environment, being usually a composite of sounds from sources both near and distant. For example, noise measurements of the ambient environment taken on a street corner would capture sounds from vehicles driving past, airplanes flying overhead, people walking and talking on the street, etc.

The traffic consultant confirmed that peak hour traffic is approximately ten percent of the ADT.

COMMENT 8.2

2. Page IV.G-16: Aircraft Noise Mitigation Plan (ANMP): see Page IVG-14 CEQA Guidelines (e).

The City adopted the findings of the Aircraft Noise Contour and Land Use Compatibility Plan (ANCLUC) in 1984. In addition to rezoning and General Plan amendments that reflect the designation of incompatible airport uses to non-residential zones, the City recognized noise contours affect on existing land uses, in particular residential zones. While the City receives funds to retrofit homes in the 65 CNEL contours of 1992, all new construction in the 60 CNEL contour are to comply with Title 24 Building Code prescriptions pursuant to the City Noise Ordinance (adopted 1996) and state regulations at Title 21.

a. Operational Phase MM G-7 STC 40 for line of sight project site impacts. Airport noise: see Measure I-1 in Section IV.I Land Use. Compliance with local law must be upheld in respect to Title 21 and Title 24. Line of sight of project site impacts is not an acceptable mitigation measure as the threshold does not apply.

RESPONSE 8.2

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Please refer to Response 9.79 to review the amendments made to Mitigation Measure G-7 on Page IV.G-26 of the Draft EIR.

COMMENT 8.3

b. Section IV.I Land Use Planning and Page IV.I-6 (sic). Regional Plan: ALUC and Local Plan in association with LAWA: ANCLUC and ANMP.

RESPONSE 8.3

The comment references the Airport Land Use Commission's Airport Influence Area for LAX. As shown on Figure I-1 on Page IV.I-5 of the Draft EIR, a portion of the Project Site lies within the ALUC's jurisdictional boundary. Please refer to Response 4.1 and Response 4.2 for further discussion regarding land use approvals required from the ALUC.

COMMENT 8.4

c. Page IV.I-27. All new construction is subject to Title 24. ANCLUC = 60 CNEL = interior 45 CNEL. All proposed residences subject to Title 24.

RESPONSE 8.4

As noted on Table IV.I-2 on Page IV.I-27 of the Draft EIR, the Project is consistent with the Los Angeles County Airport Land Use Plan Policy N-2 which requires sound insulation to ensure a maximum interior 45 db CNEL in new residential, educational, and health-related uses in areas subject to 65 db CNEL or greater. The Project is consistent with Policy N-2 in that new residential or educational uses on the Project Site, including relevant portions of the Project Site that fall within the 65 db CNEL would be designed and developed to achieve an interior 45 db CNEL.

Please refer to Response 8.2 for a discussion of the changes made to Mitigation Measure G-7 on Page IV.G-26 of the Draft EIR regarding compliance with sound standards under Title 21 and Title 24.

COMMENT 8.5

3. Page IV.I-28: FAR Part 77 restricts height as measured from runway grade in relation to landing glide slope defined by imaginary horizontal surfaces at §77.25. Verify that 200 feet above runway grade = 100 to 150 feet at project site?

a. At § 77.23 subsection (5) the surface of a takeoff and landing area of an airport or any imaginary surface established under §77.25, §77.28, or §77.29. However, no part of the take-off or landing area itself will be considered an obstruction.

b. In addition at Subpart B of Part 77 at § 77.13 Construction or alteration requiring notice, this project would be subject to Notice.

Sincerely,

Michael F. Calzada

Director

RESPONSE 8.5

The Project is in compliance with all applicable requirements pursuant to Title 14--*Aeronautics and Space, Chapter I--Federal Aviation Administration, Department Of Transportation (Continued), Part 77--Objects Affecting Navigable Airspace.*² The notification requirements are triggered by structures or objects that exceeding 200 feet from the ground level at the project site (not above the elevation of the airport or runway). The specific references to subparts 77.25, 77.28, 77.29 apply to structures/obstacles on an airport site. These requirements do not apply to projects that are located outside of an airport boundary. Furthermore, with regard to measuring the height of buildings, Section 77.13 is specific to state that the applicable reference point of measurement is at the project site, not the airport or runway elevation. Specifically Section 77.13 states: “(1) Any construction or alteration of more than 200 feet in height above the ground level at *its site*.”[emphasis added].

Additionally, as noted by the commenter, Subpart B of Part 77 requires persons proposing certain kinds of construction or alternation to give adequate notice to the Federal Aviation Administration (FAA). (Section 77.11). Under Section 77.13, any construction or alteration of more than 200 feet in height above the ground level at its site would require notice to be given. As shown on Figure II-7 on Page II-15 of the Draft EIR, the highest height zone in the land use plan for the Project is 150 feet. This small area

² http://www.faa.gov/airports_airtraffic/airports/regional_guidance/central/construction/part77/.

of the Specific Plan area has higher height standards to allow for the development of a hotel along Century Boulevard. In addition, Section 2.7 “Building Height Standards” on Page 2-25 of the Hollywood Park Specific Plan allows for one signature architectural feature near the corner of Century Boulevard and Prairie Avenue that may have a maximum height of 160 feet, allowing the architectural feature to be 85 feet taller than the maximum building height standard of 75 feet. Given that no structures on the Project Site would be higher than 200 feet, notice is not anticipated to be required under Subpart B of Part 77. Nevertheless, the following Project Design Feature will be provided to ensure proper notice is provided to the FAA prior to construction.

PDF I-3 The Applicant shall provide notice to the Federal Aviation Administration in accordance with the applicable requirements of Title 14, Part 77, Subpart B.

COMMENT LETTER No. 9

PBS&J

12301 Wilshire Boulevard, Suite 430

Los Angeles, CA 90025

Dated 11/24/08

COMMENT 9.1

PBS&J is pleased to provide the following comments on the Draft Environmental Impact Report (DEIR) for the Hollywood Park Redevelopment Project (project) prepared by Christopher A. Joseph & Associates dated October 9, 2008. The comments are organized by environmental resource area.

RESPONSE 9.1

This comment identifies the commenter and states that the comments contained in this letter on in response to the Draft EIR dated October 9, 2008. All of the specific comments contained within this letter are identified below in responses to comments 9.2 through 9.123.

COMMENT 9.2

Aesthetics

Sufficient substantial evidence has not been included for impact conclusions. In Views and Urban Design, the DEIR states that the site will be redeveloped as a high-quality modern mixed-use development that would be consistent with the surrounding uses within the community. However, the document does not describe the specific details of the project regarding number of buildings, heights, style, facade, desired tenants, and other factors that would document the similarity in urban design between the development and the surrounding community. Also, the document does not specify what constitutes the urban design

for the surrounding community, so there is no basis of comparison for project impacts. This lack of descriptive evidence needs to be addressed and added to the Final EIR.

RESPONSE 9.2

Details of the project regarding number of buildings, heights, style, façade treatments, and other factors that would describe the project in an urban design context are provided in Section I, Project Description and are described in further detail in the proposed Hollywood Park Specific Plan.

Specifically, the Hollywood Park Specific Plan contains comprehensive set of Development Standards and Design Guidelines which provide the design framework for landscape, streets and buildings that define the overall urban design for the Project. Because the Project Site will be built out over time, specific buildings have not been designed, therefore, details on building height, style, façade or tenants cannot be given at this time. However, the Development Standards section of the Hollywood Park Specific Plan provides specific regulations on building height restrictions, setback requirements, and development zones defined by density. Furthermore, the Design Guidelines section of the Hollywood Park Specific Plan provides the design framework for the Project and regulates elements, such as park design, landscape program for public streets and setback areas, building form and relief, roof considerations, façade treatments, lighting, walls and fences and style of architecture (see Chapter 3 of the Hollywood Park Specific Plan).

The designs of the buildings would vary, as noted. Exposed elevations of buildings would incorporate features such as articulated corners, building offsets, balconies, bay windows, projections, canopies, awnings, and other decorative elements, with particular attention to articulation along public streets to generate pedestrian scaling and visual interest along the streetscape. As provided in the Specific Plan, the architectural design of the buildings should avoid blank walls, especially along adjacent streets or walkways, monolithic buildings of singular form, height, wall plan and materials should be avoided, and projections, overhangs, recesses, banding and architectural details should be used to provide shadow, articulation and scale to building elevations. The finishes, colors and materials in the development would be varied but cohesive, emphasizing the use of natural materials such as plaster, stone, brick, patina'd metal, wrought iron, tile, and wood; smaller-scale details would be emphasized where their visual and tactile qualities can be most appreciated, typically on the lower levels of buildings and adjacent to public pedestrian ways.

Substantial evidence to document the project's compatibility with the surrounding community is provided in the form of photographs of the Project Site and surrounding land uses in the immediate project vicinity. Additionally, the photographs also show the existing urban design of the surrounding community. The Draft EIR draws its conclusions regarding aesthetics based upon a comparison between the design details contained in the Hollywood Park Specific Plan and the photographic evidence documenting the urban design of the existing community.

COMMENT 9.3

For Impacts to Light and Glare, the DEIR presents sufficient information on the types of lighting impacts presented by the project, but does not sufficiently analyze the specific impacts those light sources will have on the project area. According to CEQA Guidelines, whenever a new project creates a substantial amount of new light or glare which would adversely affect day or nighttime views, the impact must be analyzed. A comparison must be made between existing conditions and proposed conditions. Additionally, the DEIR mentions that the proposed buildings would incorporate materials to minimize light and glare transmission, but gives no examples of what those materials might be and no mitigation measures are included to ensure that non-reflective surfaces would be used to the maximum extent feasible. The impacts may be net beneficial, but the section is lacking substantial evidence to support this conclusion. This should be reevaluated.

RESPONSE 9.3

Pages IV.A-18 and IV.A-19 of the Draft EIR include a thorough discussion of the existing nighttime lighting and glare in the project area. As discussed, nighttime lighting along the Century Blvd. and Prairie Ave. corridors is generated by street lighting, illuminated signage, security lighting, architectural lighting, vehicle headlights from commercial and residential uses. The existing Hollywood Park Racetrack and Casino generate a moderate to high degree of nighttime lighting from similar sources. Additionally, the Main Racetrack is illuminated with approximately 29 light poles that stand between 60 to 70 feet height above grade, and each pole is equipped with 30 1,000-watt metal halide fixtures. With respect to the Project, lighting will be used to highlight architectural elements on buildings and landscape, illuminate tenant and Project signage, promote way-finding, and enhance security and safety. Lighting structures will be designed at a compatible scale with the surrounding buildings. As discussed on Page IV.A-21, all parking structures would be required to incorporate shielding elements and orient entry and exit driveways to avoid light and glare trespass onto adjacent areas within the Project Site that are designated for residential land uses. See Project Design Feature PDF A-5 on Page IV.A-26 and Section 3.4.4.6 on Page 3-105 of the Hollywood Park Specific Plan. Further, the majority of lighting would be directed towards the interior of the Project Site and directed away from the neighboring land uses to minimize impacts of light and glare in the surrounding project area. Light “spillage” from the Project onto existing neighboring land uses will also be minimized by the perimeter landscape setback zone. Section 3.3.2 beginning on Page 3-78 of the Hollywood Park Specific Plan provides the design guidelines for the landscape buffer in the landscape setback zone that functions as a transition space between the private and public realms. As compared to the existing moderate to high degree of nighttime lighting on the Project Site generated by the 29 lights poles standing between 60 and 70 feet, and security and parking lot lighting, the Project through its land use design and mitigation measures would result in reduction in light spill-over impacts on the surrounding neighborhoods. Project lighting will be designed to illuminate main pedestrian and vehicle thoroughfares to promote way-finding and safety. Building lighting would be designed to avoid direct visibility of the light source, and signage on the Project Site will be regulated by the signage development standards and design guidelines in the Hollywood Park Specific Plan. Section 3.6.2.2 on Page 3-130 of the Specific Plan provides that for wall and projecting

signs, exposed neon shall not be visible from Century Boulevard and Prairie Avenue, and internal illuminated box signs and banners used as permanent signs are prohibited.

Moreover, Section 5.5 on Page 5-7 of the Specific Plan provides that a separate permit shall be required for each sign or set of signs to be installed or altered. Applications for approval of an Administrative Sign Permit, administered by the Planning and Building Administrator, requires submittal of a sign plan that includes such information lettering style, colors, materials, and method of illumination. Through this permit process, the Planning and Building Department is able to ensure that the signage program provided in the Specific Plan achieves a unified and cohesive overall appearance, while minimizing the impacts from new lighting sources on the existing neighboring community.

With respect to examples of building materials to be used that would minimize light and glare transmission, please refer to Response 9.2, which discusses the design guidelines in the Specific Plan. Furthermore, page IV.A-27 of the Draft EIR includes Mitigation Measure A-3 which states: “The Proposed Project’s facades and windows shall be constructed of non-reflective materials such that glare impacts on surrounding residential properties and roadways are minimized.”

COMMENT 9.4

Automobile headlights and parking lots are discussed in the ‘Impacts to Light and Glare’ section as a source of ambient nighttime lighting on the Project Site and surrounding vicinity. The DEIR states these impacts are anticipated to be substantially less intrusive than the lighting impacts generated by the existing uses on the project site. The DEIR lacks substantial evidence to support this conclusion, and the DEIR does not discuss specific impacts from automobile headlights at ingress/egress points on sensitive adjacent as well as the residential on-site uses. These additional impacts need to be reevaluated and addressed in the Final EIR. Appropriate mitigation measures are not included.

RESPONSE 9.4

Page IV.A-21 of the Draft EIR includes a thorough evaluation of the Proposed Project’s potential impacts associated with nighttime lighting.

In addition, please refer to Response 9.3 for a further discussion of the impact of new sources of nighttime lighting from the Project as compared to the existing uses on the Project Site.

With respect to impacts to on-site uses from automobile headlights, the Draft EIR states: “All parking structures would be required to incorporate shielding elements and orient entry and exit driveways to avoid light and glare trespass onto adjacent areas within the Project Site that are designated for residential land uses.” The Draft EIR also includes Mitigation Measures A-1 through A-3 and Project Design Features A-1 through A-5 on pages IV.A-26 and IV.A-27 that would ensure potential impacts associated with nighttime lighting would be less than significant.

With respect to impacts from automobile headlights at ingress/egress points on sensitive adjacent uses, the Project site is surrounded by major commercial thoroughfares, and predominately commercial uses. There are currently night uses, such as night racing, which create spillover light and automobile traffic-related light impacts. Review of the photographs of the surrounding uses, does not yield evidence of any sensitive uses that might be impacted by automobile headlights from site generated traffic. The residential uses in the vicinity are set back from the commercial thoroughfares and residential streets, so light from Project traffic will not be directed toward these uses. Automobile lights from Project traffic should not be any more noticeable than nighttime automobile lights from current uses at the racetrack. In addition, with the elimination of the lights related to nighttime events at the racetrack, overall light impacts to residences would be reduced.

COMMENT 9.5

Air Quality

Pages IV.B-24-25:

The statement, *Compliance with Rule 403 would reduce regional PM₁₀ emissions associated with construction activities by approximately 61 percent* is incorrect. According to the URBEMIS 2007 output files, a 61 percent reduction is provided in only one of the phases of construction. The actual reduction calculated ranges from phase to phase. This statement is also provided later in the document and should be revised.

RESPONSE 9.5

The Project grading will all be completed as part of the first phase of construction. The Final EIR has been modified to correct this statement to correctly state that “Compliance with Rule 403 *during the grading and earthwork phase* would reduce regional PM₁₀ emissions associated with construction activities by approximately 61 percent.” See Section II, Additions and Corrections.

COMMENT 9.6

Table I.B-7 is labeled as Regional Construction Emissions - Unmitigated. However, footnote “a” states that it assumes proper implementation of the SCAQMD Rule 403 - Fugitive Dust. This table should only represent unmitigated emissions. The SCAQMD Rule 403 emission reduction should be included in the mitigated emissions table for clarification since it would be considered as a mitigation measure.

RESPONSE 9.6

As noted on Page IV.B-23, it is a mandatory requirement for all projects in the South Coast Air Basin to comply with Rule 403 for fugitive dust. Because compliance with Rule 403 is mandatory, the air quality analysis for regional construction emissions assumes proper implementation of Rule 403 and therefore, application of Rule 403 is assumed included in the unmitigated and mitigated regional construction

emissions tables (Tables IV.B-7 and IV.B-13. As discussed on Page IV.B-37, implementation of Mitigation Measures B-1 through B-9 would ensure that fugitive dust emissions would be reduced by 61 percent. Rule 403 was also included as a Mitigation Measure to ensure that compliance with Rule 403 would be properly implemented and monitored.

COMMENT 9.7

Pages IV.B-25:

At the top of the page, the statement, *As such, construction activity would result in a less than significant toxic air contaminant impact* should be revised. The statement should say that construction activity would result in a less-than-significant impact regarding asbestos-containing materials (ACM). The proposed project would result in a significant impact regarding TACs as presented in the HRA analysis prepared for the project. This is not addressed properly in the DEIR and is a fatal flaw.

RESPONSE 9.7

The commenter is correct in noting the typographical error in the statement regarding toxic air contaminants. The Final EIR will be updated to correct this typographical error. Specifically, the first full sentence on Page IV.B-25 will read: “As such, construction activity would result in a less than significant ~~toxic air contaminant~~ ACM impact.” Furthermore, on Page IV B-24, the sub-heading “Toxic Air Contaminant Impacts” should be replaced with “Asbestos Containing Materials Impacts.” This correction will also be noted in the Additions and Corrections Section of the Final EIR.

The commenter is, however, incorrect in suggesting that the impacts from TAC are not properly addressed in the DEIR and is a fatal flaw. On Page IV.B-26, the DEIR discloses that construction related diesel emissions would result in a significant impact. The project’s significant and unavoidable impact with respect to TAC is clearly disclosed in the Executive Summary on Page I-11, and on Page IV.B-26 of the Draft EIR.

COMMENT 9.8

Pages IV.B-31:

Under the Consistency with Air Quality Management Plan, consistency criterion No.1 indicates that CO is the preferred pollutant for assessing local area air quality impacts. However, a discussion should be provided that the proposed project would result in significant air quality emissions from other criteria pollutants such as NOX, ROG, PM₁₀, and PM_{2.5}. The project is located in the South Coast Air Basin that is a nonattainment area for both ozone and particulate matter. These criteria pollutants are also considered for consistency determination. This is a substantial omission in the DEIR that renders it inadequate.

RESPONSE 9.8

As suggested by the comment, the consistency discussion of Criterion No. 1 under the Air Quality Management Plan (Page IV. B-31 of the Draft EIR) has been updated in the Additions and Corrections Section of the Final EIR. The Project would result in significant VOC, NOX, CO, PM_{2.5}, and PM₁₀ impacts during operations. The Basin is a non-attainment area under the CCAA for O₃ and the Project would exceed the regional daily emissions threshold for ozone precursors, VOC and NOX. The Basin is also a non-attainment area under the CCAA for PM_{2.5} and PM₁₀ and the Project would exceed the regional daily emissions thresholds for PM_{2.5} and PM₁₀. The Project would potentially increase the frequency of O₃, PM_{2.5}, and PM₁₀ air quality violations.

However, notwithstanding the updated analysis, the overall significance determination for impacts related to consistency with the Air Quality Management Plan remains unchanged—that is, significant and unavoidable. As stated on Page IV.B-32 of the Draft EIR, "...the Proposed Project would result in a significant unavoidable impact with respect to AQMP consistency." Page IV. B-38 of the Draft EIR again discloses that, "With respect to threshold question (a), the Proposed Project and the Equivalency Program would not be consistent with the 2007 AQMP." This information is also repeated in Section V. A. Summary of Unavoidable Impacts. This determination was made because the Project is inconsistent with Criterion No. 2 of the AQMP. Since there is no change to the significance conclusion, the Draft EIR conclusions remain valid and the Draft EIR has disclosed the impacts.

Section V. A. Summary of Unavoidable Impacts will be updated to delete the reference to a "technical" inconsistency. Specifically, the second point under the second bullet will be amended to read, "~~Technical~~ Inconsistency with the Air Quality Management Plan."

COMMENT 9.9

Pages IV.B-37:

The first paragraph indicates that fugitive dust emissions would be reduced by 61 percent, exhaust would be reduced by 5 percent, and VOC emissions would be reduced by 40 percent with implementation of mitigation measures. However, this is not entirely correct. Table IV.B-13 shows a reduction in emissions as compared to unmitigated emissions, but is not consistent with the percentages provided in the paragraph above. Furthermore, as previously stated, URBEMIS 2007 outputs for the project indicate that the reduction associated with mitigation measures vary depending on the construction phase. Reductions may not be substantial enough to reduce the impacts to less than significant for all phases. This analysis needs to be revised.

RESPONSE 9.9

The commenter is referring to Table IV.B-7 on Page IV.B-25 and Table IV.B-13 on Page IV.B-37. Table IV.B-25 notes the unmitigated regional construction emissions by construction year (2009 – 2014). Table IV.B-13 notes the mitigated regional construction emission by construction year (2009 – 2014). As noted

by commenter, the description in percentage reduction from implementation of mitigation measures do not correlate if you apply a straight percentage reduction to the Maximum Regional Total, as shown on the tables. However, the reductions taken for mitigation are nonetheless correct because the reductions are only for specific sources of emissions (i.e., 40% for architectural coating, 5% for heavy duty engine maintenance or 61% fugitive dust emissions). While the percentage reductions cannot be compared on a Maximum Regional Total level, they are the reductions captured by a mitigation measure aimed at reducing emissions from a specific source.

Furthermore, the commenter is correct in noting that reductions from mitigation measures may not be substantial enough to reduce impacts to less than significant for all phases. For this reason, the DEIR properly discloses that air quality impacts related to construction activity would be significant and unavoidable, even after mitigation. This analysis does not need to be revised.

COMMENT 9.10

Pages IV.B-38:

The DEIR and technical study indicate that the HRA identified a mitigated carcinogenic risk of 28 persons in one million, which is greater than the ten persons in one million significance threshold. The modeling accounted for the use of aqueous diesel fuels in only some of the modeling results. Considering the calculated carcinogenic risk, additional mitigation measures should be included to further reduce the significant and unavoidable impact. Additional mitigation measures such as the use of catalytic converters and newer equipment should be further discussed. If this type of mitigation is feasible, it should be included.

RESPONSE 9.10

Additional mitigation measures based on SCAQMD guidance have been included in the DEIR to reduce diesel-related construction emissions. However, short-term emissions would still result in a significant risk. The following mitigation measures were added to the DEIR:

MM B-17. All diesel powered construction equipment in use shall require control equipment that meets at a minimum Tier III emissions requirements. In the event Tier III equipment is not available, diesel powered construction equipment in use shall require emissions control equipment with a minimum of Tier II diesel standards.

MM B-18. Contractors shall utilize alternative fueled off-road equipment where possible.

MM B-19. Contractors shall provide temporary traffic controls, such as a flag person, during all phases of construct to maintain smooth traffic flows.

MM B-20. Contractors shall schedule construction activities that effect traffic flow on arterial system to off-peak hour to the extent practicable.

COMMENT 9.11***Cultural Resources***

Implementation of the proposed project requires the demolition of the Hollywood Park race track complex. The complex dates from 1938 and was reconstructed in 1950 following a major fire which all but destroyed the original main building and grandstand. Both the original racetrack complex with its site layout, track, landscape and related buildings and the reconstructed main building are more than 50 years of age and are potentially eligible for listing in the National Register of Historic Places and/or the California Register of Historic Resources. The City of Inglewood does not have a municipal historic preservation ordinance. In 2005, Historic Resources Group prepared a confidential memorandum for the project's developer providing a preliminary assessment of the sites potential historic significance. That memorandum notes the majority of the buildings on the site date from the 1960's and that a number of prominent buildings date from the 1980's. The memorandum does note, however, that the spatial relationships between the track, main building, parking lot and main entrances remain and that the main building (reconstructed in 1950) could have potential historic significance, as it retains its signature shape and many of its original features. It also notes that the racing track itself, including its park-like interior, though renovated several times, retains (in its position and orientation) much of its original feel and association. The issue of integrity figures large in the discussion of potential eligibility. The 2005 HRH (sic) Memorandum notes that, "despite this compromised integrity, a case might be made for designation of the track and Main Building as historic resources under CEQA." In 2007, Page and Turnbull (sic) completed a Historic Resources Technical Report, which covers much the same ground as the 2005 memorandum, though it is significantly more detailed. The DEIR relies heavily on the Page and Turnbull (sic) Report and rarely strays from its language or conclusions.

RESPONSE 9.11

The comment is correct in noting that the integrity of the Property is critical to the evaluation of the potential for the property to qualify as a historic resource. Section 3 of the National Register Bulletin #15 entitled "How to Apply the National Register Criteria for Evaluation" provides that, "For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by: (1) Being associated with an important historic context and (2) Retaining historic integrity of those features necessary to convey its significance." Hence, as required by the National Register guidelines, the discussion of integrity is featured as a significant part of the analysis of the property as a historic resource.

The comment also refers to the preliminary conclusions 2005 Historic Resources Group (HRG) Memorandum as compared the subsequent Historic Resources Technical Report dated July 24, 2007 prepared by Page & Turnbull, Inc. and included as Appendix E-1 to the Draft EIR. It is important to note that the seven-page 2005 HRG Memorandum referenced in the comment is not confidential, and was referenced and reviewed as part of the analysis completed by Page & Turnbull. Further, the HRG Memorandum was commissioned by the Applicant prior to its acquisition of Hollywood Park Racetrack in 2005 to provide a general overview of potential historic issues associated with the property, and

therefore does not provide an extensive analysis of the racetrack as a historic resource under CEQA as was done in the Page & Turnbull Historic Resources Technical Report. While the HRG Memorandum notes that "... a case might be made for designation of the track and Main Building as historic resources under CEQA," the HRG Memorandum also notes that this preliminary conclusion needed to be confirmed through further research and analysis because "sufficient architectural integrity may not remain to merit a historic designation." As suggested in the general overview provided in the HRG Memorandum, a more extensive review of the site as a potential historic resource was conducted by Page & Turnbull in 2007. While the HRG Memorandum notes that the property "could" contain sufficient integrity to qualify as a historic resource, Page & Turnbull's more comprehensive analysis concluded that the property does not maintain sufficient integrity.

As part of the analysis of the property as a potential historic resource under CEQA, pursuant to the National Register Guidelines, Page & Turnbull analyzed whether there is enough of the physical historic fabric remaining that manifests the historic events, persons, or architecture/design of the property. As stated on Page IV. E-25 of the DEIR Page & Turnbull found that, "Overall, the property's historic integrity has been eroded to the point that the property does not convey its historical significance." All that remains are a few individual buildings and features that "are strong in association with the Park's history, including "the Turf Club Entrance (Gate B), the spatial relationships between the Main Building and racetrack, and the overall character of the property as a racetrack." The spatial relationship between the grandstand and the oval-shaped racetrack, and the overall character of the property as racetrack could be true of any racetrack and does not guarantee eligibility for listing on the National Register of Historic Places. The HRG Memorandum comes to a similar conclusion about the remaining historic fabric, and notes that, "While track itself and the main building (including grandstand) continue to evoke some sense of history, both have sustained significant alterations over the years. Spatial relationships have also been compromised by the addition of new buildings and landscaping in the past 25 years."

A discussion of the erosion of the property's historic integrity due to the numerous changes to the property, is found on Page IV. E-24 of the DEIR, which provides that, "the property's integrity of design, materials, and workmanship has been substantially compromised due to numerous alterations and new construction that occurred after the period of significance. These alterations have included, but are not limited to, the installation of the exterior escalators and staircase in the Clubhouse (1954), the addition of the perforated screen wall (1961), the addition of the fifth floor on the Main Building (1975), and the new construction of new horse barns and tack rooms (1980)." As further stated on Page IV. E-24 of the Draft EIR, "The various alterations have largely affected much of the original Late Moderne detailing. The building's affected Late Moderne elements have included the horizontal emphasis, primarily achieved by the continuous window bands of the curved Clubhouse tower (since altered by the addition of an ungainly fifth story); the cantilevered, curved Clubhouse fourth floor canopy (similarly affected by the fifth story addition); the grid of square windows framed by prominent bezels on the grandstand's west elevation (since covered); the wide beveled fourth floor window located south of the Clubhouse tower; and the projecting curved canopy with oval cutout at the top of the Clubhouse entry staircase (negatively impacted by the addition of a sloping escalator canopy)."

COMMENT 9.12

The National Register regularly publishes technical bulletins to provide information and direction on how to evaluate various kinds of historic properties. The following comments are made with reference to the NR Bulletin entitled “How to Apply the National Register Criteria for Evaluation.”

RESPONSE 9.12

The comment makes provides a citation reference to the resources consulted for making comments regarding evaluating historic properties.

COMMENT 9.13

In evaluating a property for eligibility the National Register suggests that as a first step, a property be classified as a (1) District; (2) site; (3) building, (4) structure, or (5) object. This step is entirely missing from the EIR section as well as from the two evaluative reports although Hollywood Park contains all of these features. An evaluation of the classification of the Hollywood Park site should be included in the EIR and a finding made. In general, properties with large acreage or a number of resources are usually considered districts. A district is said to possess a significant concentration, linkage, or continuity of sites, buildings, structures and/or objects which are united historically or aesthetically by plan or physical development. The Hollywood Park property contains all of these features. The Bulletin goes on to state that, “A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties.” A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points and can contain buildings, structures, sites, objects or open spaces that do not contribute to the significance of the district. In general, were Hollywood Park addressed as a District for purposes of evaluation of its significance the presence of newer buildings would not of itself render the property ineligible and other conclusions regarding eligibility might have been drawn and supported.. (sic)

RESPONSE 9.13

The comment suggests that the first responsibility of an evaluation of a potentially historic property is to classify the property as a site, district, building, structure or object. The Draft EIR analyzes the entire Project Site as a single property site upon which a number of buildings, structures and objects stand. Nonetheless, the property complex could potentially qualify as a district because its resources are interrelated and functionally aligned. However, the classification of the property as a district does not change the evaluation of the project site as presented in the Draft EIR. Any property (classified as a building, structure, site, object or district) must possess both historic significance and integrity as defined by the National Register of Historic Places. While the Draft EIR and the Historic Resources Technical Report (Appendix E-1 of the Draft EIR) acknowledges that the property has significance, the property has

lost its historic integrity as evidenced by the numerous alterations and additions to the Project Site. Please refer to Pages 33-44 of the Historic Resources Technical Report in Appendix E-1 of the Draft EIR for a discussion of the loss of integrity of the Project Site. In summary, regardless of whether the property is classified as a (1) district, (2) site, (3) building, (4) structure, or (5) object, and evaluated for eligibility on the National Register, the property must retain “historic integrity of those features necessary to convey its significance,” as provided in Section 2 of the National Register Bulletin #15.

To further enhance the evaluation in the Draft EIR of the Project Site as a potential historic resource, and to address the concerns raised in the Comment 9.13, Page & Turnbull conducted an additional analysis of the Project Site as a potential historic district. Regardless of its classification, the property would still possess the significance outlined in the Historic Resources Technical Report—that is, the Property is significant under Criterion A (Event) and Criterion C (Design/Construction). However, as a whole, the project site would not qualify as a historic district, due to the numerous alterations and non-contributing additions to the site (See Table 1 of the Historic Resources Technical Report (Appendix E-1 of the Draft EIR), Pages 39-42). The number of potential non-contributing resources would far exceed the number of contributing resources in this potential historic district. The Project Site possesses a total of fifty-one resources; only two of these resources (Turf Club Entrance and Practice Track) would qualify as potential contributors to a historic district. The other forty-nine resources were either: 1) built after the period of significance and are, therefore, considered non-historic; 2) lack historic integrity, due to major alterations; or 3) lack significance, as related to the outlined significance criteria. While it is clear that Hollywood Park still functions as a racetrack, its historical features from the height of its period of historic significance have been severely altered to the point that as a whole, the property does not convey its significance as a historic racetrack.

Although many of the potential contributors to a historic district were built after period of significance, the mere presence of newer buildings would not by itself render the property ineligible for listing in the National Register; however, the property as a whole has experienced numerous alterations after the period of significance (defined as 1938 to 1950), including but not limited to, the demolition and replacement of the majority of the barns on the project site, addition of new concession stands and ancillary buildings, addition of several major buildings (Pavilion of the Stars, Clinic, and Garden Paddock), and major alterations to the Main Building and Grandstands that removed the Late Moderne architectural detailing. Please refer to Response 9.11, Page IV.E-24 of the Draft EIR, and Pages 27, and 39-42 of the Historic Resources Technical Report (Appendix E-1 of the Draft EIR) for further details regarding the significant physical alternations that have taken place on the Property Site after the period of significance.

For additional information regarding the Property Site as a potential historic district, please refer to the Hollywood Park Preliminary District Evaluation and DEIR Response Preliminary District Evaluation contained in the Additions and Corrections to the Draft EIR.

COMMENT 9.14

Once the property is classified, the historic context has to be established. The DEIR and the reports on

which its based do a fairly good job of providing context, but once the document moves into evaluating the project based on the various criteria, the historic context gets lost. The focus is on the integrity of a particular building rather than on the integrity of the Park as a district in its historic context. The DEIR needs to evaluate Hollywood Park in its context. If the context is “20th Century Horse Racing in California” then the property would be evaluated under Criteria A as to its association with important events in that history. Criteria B would apply to the property’s association with persons significant in the development of horse racing in California and Criteria C would apply to those buildings, structures and/or objects whose architectural form or style reflect important design qualities integral to the development of the sport in California.

RESPONSE 9.14

As discussed in Section IV.E of the Draft EIR, Page & Turnbull evaluated whether the property was potentially eligible for listing on the National Register (and the California Register) under Criterion A (Event), Criterion B (Person) and Criterion C (Design/Construction), and found that it could be eligible under Criterion A and C. As noted on Page 34 of the Historic Resources Technical Report (Appendix E-1) and Page IV.E-22 of the Draft EIR, the historic context under which the property was evaluated under Criterion A is the “history of thoroughbred horsebreeding and racing in Southern California.” As further noted on Page IV. E-22 of the DEIR, “Hollywood Park was the fourth thoroughbred racetrack to be built in California, and is significant on a local level as one of three thoroughbred racetracks located in Southern California.”

Page & Turnbull established historic contexts by examining the history of Inglewood, horse racing, California racetracks, architect Stiles O. Clements, architect Arthur Froehlich, and the Late Moderne Style. To assist in the evaluation of the historic context, a list of the Property’s character-defining features was provided. Please refer to Page IV.E-21 of the Draft EIR and Pages 30-32 of the Historic Resources Technical Report (Appendix E-1 of the Draft EIR) for a list of the Property’s character-defining features.

The property was not found to be eligible under Criterion B (Person) because as stated on Page IV.E-23 of the Draft EIR, “Although many entertainment industry executives and celebrities were associated with Hollywood Park over the years, federal and state criteria require that the property be the location that best illustrates the important lifetime achievements of the individual. For Hollywood’s luminaries, the subject property does not meet this criterion. For similar reasons, the majority of jockeys, breeders, and trainers associated with Hollywood Park were also affiliated with the region’s two other thoroughbred racetracks such that the subject property cannot make a unique claim to their important achievements.” Please see Response 9.15 for a further discussion regarding why the property is not eligible for listing under significance Criterion B of the National Register.

Under Criterion C (Design/Construction), Page & Turnbull found that the property is eligible for listing in the National Register as “a property that represents the work of a master, Arthur Froehlich. Hollywood

Park was the first of many horse-racing facilities that Arthur Froehlich, FAIA designed during a long career in which he became known as the world's premier racetrack architect.”

It should be noted that although the property was found to be eligible for listing in the National Register under Criterion A and C, as discussed in Response 9.11, the National Register also requires that the property retain “historic integrity of those features necessary to convey its significance.” Despite its eligibility under Criterion A and C, the property fails to meet the requirements of integrity. Please see Response 9.17 for a complete discussion of the various elements of integrity pursuant to the National Register.

COMMENT 9.15

The DEIR states that in spite of Hollywood Park's association with leading figures in the entertainment business who owned, built, financed, raced, watched and otherwise participated in the events that took place in Hollywood Park, that association is not significant as a consideration of historic eligibility. The EIR misquotes and misrepresents the criteria of association and therefore draws the wrong conclusions. The Bulletin states: “A community or State may contain several properties eligible for associations with the same important person if each represents a different aspect of the person's productive life. People like Jack Warner and Louis Mayer may be best known for heading up movie studios but horseracing was an enormous part of their lives (along with other similarly prominent people) and they an important part in the development both of Hollywood Park (the name is not an accident) and the development of the sport. The EIR contains this information but fails to draw the correct conclusion because it misstates and misinterprets the requirement. This must be analyzed and may result in a different significance conclusion from that contained in the DEIR.

RESPONSE 9.15

The Draft EIR and the Historic Resources Technical Report acknowledge that important persons, otherwise associated with the movie industry, were associated with Hollywood Park, including Jack Warner and Louis Mayer. However, mere association of these persons with Hollywood Park does not qualify the property for listing in the National Register under significance Criterion B (Persons). According to National Register Bulletin #32 entitled “Guidelines for Evaluating and Documenting Properties Associated with Significant Persons”:

- “Eligible properties generally are those associated with the productive life of the individual in the field in which (s)he achieved significance.” (Page 15)
- For example, “If an individual is considered significant in the area of education, the nominated property should be associated with his or her educational accomplishments.” (Page 18)
- Furthermore, when comparing multiple resources associated with the same individual, “...a property that is associated with only a minor facet of the person's life may not be significant in comparison with other properties.” (Page 20)

Jack Warner, Louis Mayer, and others are significant as studio executives, and therefore a property that reflects their film industry accomplishments would be more appropriate to qualify them as a “significant person” within the context of the California and National Registers. The National Register states, “The persons associated with the property must be individually significant within a historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.”

In the case of Hollywood Park, association with prominent Hollywood persons is more of a pattern or trend, and was included in the discussion of Criterion A (Events) and within the historic context for the property (See Historic Resources Technical Report, Pages 18-25). In addition, at Hollywood Park, little physical evidence remains of the park’s association with these prominent Hollywood celebrities: the Turf Club that they visited has been remodeled; the stables that housed Mayer’s horses have been removed; and, although the track their horses ran on does still exist, it is not a sufficient or strong enough of an association to cite significance under National Register Criterion B (Persons). Given all of this, the conclusions contained in the Draft EIR regarding the analysis of the Project Site under National Register Criterion B (Persons) remains valid and unchanged.

COMMENT 9.16

Much is made of the fact that the original main building was destroyed by fire and reconstructed (the first floor was not destroyed, so the reconstructed main building was built on and within its footprint. The Bulletin states, “After the passage of fifty years a reconstruction may attain its own significance for what it reveals about the period in which it was built.” The DEIR does not address this issue.

RESPONSE 9.16

Page IV.E-24 of the Draft EIR addresses the significance of the reconstruction of Hollywood Park’s Main Building after the 1949 fire. Specifically, the DEIR states that, “ In 1950, Arthur Froehlich undertook a reconstruction of Hollywood Park’s Main Building. This reconstruction is significant as a representation of Arthur Froehlich’s first work on a racetrack.” The Draft EIR also acknowledges the significance of the reconstruction of the Main Building by Arthur Froehlich by selecting 1950 (the year in which the reconstruction was completed) as the end point of the period of significance, since, as suggested by the comment, the reconstruction may attain its own significance. Since 1950 was selected as the end point for the period of significance, the reconstruction after the fire is considered part of the building’s historic significance and the analysis precedes on this basis.

Nonetheless, the Draft EIR concludes that the property has been significantly altered since 1950, and as such the historic integrity of the buildings, even those reconstructed by Froehlich, has been eroded since the property’s “integrity of design, materials and workmanship has been substantially compromised due to numerous alterations and new construction that occurred after the period of significance.” See Page IV.E-24 of the DEIR for further discussion.

COMMENT 9.17

Period of significance - the period of significance is limited to 1938 - 1950 however the discussion of the site's history makes it very clear that the period of significance is considerably longer, stretching well into the 1980's. The fact that the site has more contemporary significance (less than 50 years) does not detract from its historic context, however limiting the period of significance allows for the dismissal of numerous important events that enhance the potential historic significance of the site.

RESPONSE 9.17

Under the National Register Bulletin #16A entitled "How to Complete the National Register Registration Form," the "period of significance" is defined as "the length of time when a property was associated with important events, activities, or persons or attained the characteristics which qualify it for the National Register Listing." Bulletin #16A also notes that:

- "Continued use or activity does not necessarily justify continuing the period of significance. The period of significance is based upon the time when the property made the contributions or achieved the character on which significance is based." (Page 42)
- "Fifty years ago is used as the closing date for periods of significance where activities begun historically continued to have importance and no more specific date can be defined to end the historic period." (Page 42)
- "The property must retain integrity for all periods of significance entered." (Page 42)

The period of significance presented in the Draft EIR and the Historic Resources Technical Report was determined in accordance with the guidelines presented in National Register Bulletin #16A.

While the Hollywood Park property still operates as a racetrack as it did in 1938, as noted in Bulletin #16A, its continued use as a racetrack does not necessarily justify continuing the period of significance to the present day. The year 1950 was found to be the end of the period of significance because it coincides with the year of completion of Arthur Froehlich's rebuilding of the Main Building, and it marks the moment when the property "attained the characteristics which qualify it for the National Register Listing." In this case, those characteristics are related to the Late Modern style of architecture embodied in the 1950's rebuilding of the track.

Additionally, by 1950, the important events and activities which would allow it to qualify for listing in the National Register had taken place. For example, by 1950, John Longden, one of the earliest jockeys closely associated with Hollywood Park to become widely regarded for his racing skill and track record of victories, won the Triple Crown with the horse Count Fleet (1943), and then won the Hollywood Park riding title in 1945, and Hollywood Park had been the location of MGM mogul Louis B. Mayer's stable of champion thoroughbreds that produced consistent winners from 1940 until 1946. Additionally, as discussed in the Draft EIR on Pages IV.E-7 through IV.E-9, during the last half of the 1940s, Hollywood

Park continued to set attendance records and was the place to “see and be seen.” Thus, 1950 is an appropriate end of the period of significance as it marks the time when Hollywood Park attained its historic characteristics associated with important events and activities (Criterion A), and significant design and construction characteristics (Criterion C).

The 2005 HRG Memorandum reaches a similar conclusion as is found in the extensive Page & Turnbull analysis (the Historic Resources Technical Report) regarding the period of significance of 1938-1950. Furthermore, while a property may be considered for a listing on the National Register if it has achieved significance within 50 years, these properties are only eligible if they meet special requirements in addition to meeting the regular requirements (i.e., being eligible under one or more of the four Criteria and possessing integrity). Properties that have achieved significance within the last 50 years are excluded unless “they are of exceptional importance.” As defined in the Bulletin, “the phrase ‘exceptional importance’ may be applied to the extraordinary importance of an event or to an entire category of resources so fragile that survivors of any age are unusual.” There are no facts that support categorizing the property as being of “exceptional importance.”

Furthermore, in evaluating the Property’s period of significance, Page & Turnbull did refer to other racetracks, which are listed in local, state or national historical register, including Santa Anita Racetrack in Arcadia, California. As a point of reference, the period of significance for Santa Anita Racetrack, which is listed in the National Register, is defined as 1934 to 1953, which coincides with the original construction of the racetrack to the last major alterations to the entire facility. This racetrack possesses significance within the history of thoroughbred horse racing, as well as integrity, and possesses a total of fifty-three contributing resources and twenty-one non-contributing resources.

COMMENT 9.18

The application of the integrity test is limited to a discussion of the retention of historic fabric by buildings on the site, with a focus on the Turf Club and the Main Building. However, the Bulletin indicates as regards eligibility under Criteria A and B that “A property important for association with an event(s), historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance. A basic integrity text for a property associated with an important event(s) or person(s) is whether a historical contemporary would recognize the property as it exists today. In this case, a property might be found eligible if: it is still on its original site (Location); the important features of its setting are intact (Setting), it retains most of its historic materials (Materials) and it has the basic features expressive of its design and function such as configuration, proportions, spatial relationships. (Design) This would be particularly true in evaluating a District type property. This analysis was not done. As the property qualifies under most of these criteria, the significance of the site as a Historic District should be evaluated and may result in a significance conclusion different from that contained in the DEIR.

RESPONSE 9.18

As noted by the comment National Register Bulletin #15 indicates that, “A property important for association with an event(s), historical pattern, or person(s) ideally might retain some features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance. A basic integrity test for a property associated with an important event(s) or person(s) is whether a historical contemporary would recognize the property as it exists today.” But, Bulletin #15 also notes that determining which of the relevant aspects of integrity is most important to a particular property requires an understanding of the property’s significance and its essential physical features.

With respect to Hollywood Park, there have been many modifications and alterations over the years. Indeed the only fundamental aspect of the design that remains intact is the relationship of a grandstand to an oval racetrack, and the fact that the property is in its original location. These characteristics of themselves are not sufficient overall to constitute integrity. If they were sufficient, then any oval racetrack and grandstand would be arguably sufficient to merit the designation of being listed on the National Register. The intent of the National Register is preserve properties that have sufficient historic fabric to make them worthy of preservation.

Below is a discussion and analysis of each of the seven aspects of integrity as presented in National Register Bulletin #15:

Location. With respect to location, the property is still in its original location.

Design. “Design is the combination of elements that create the form, plan, space, structure and style of a property.” As discussed on Page IV.E-25 of the Draft EIR, the changes to the property include, “alterations to the lakes and landscaping of the infield track; the relocation of the Paddock to the Main Building’s front entrance area; the replacement of virtually all of the original barns, stables, and dormitories located on the east side of the racetrack; and the complete remodeling of food and beverage concession areas, pari-mutuel betting windows, and other public areas of the Main Building. Additionally, a large and highly prominent five-story grandstand Pavilion/Casino erected in 1984/1994 situated near the south end of the Main Building has compromised the spatial relationships of the subject property’s original layout. Due to these enumerated modifications, the character-defining features of the subject property’s Late Moderne architectural style have also been negatively affected.” Given this, the historic design of the site and the buildings on the Property do not remain.

Setting. “Setting is the physical environment of a historic property and refers to the character of the place in which the property played its historical role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space.” The setting of Hollywood Park has changed significantly over time. For example, significant change has occurred in the infield. As noted in the Draft EIR and on Page 41 of the Historic Resources Technical Report, the racetrack infield area has been completely changed since its construction in 1938 by landscape architect Edward Huntsman-Trout and

therefore no longer retains integrity. Additionally, the addition of infield turf track (1967); the replacement of the infield race display (1979); the demolition of infield pavilion (1991); the dredging of new infield lakes (1991); and the execution of a new infield landscaping plan (1991) all contributed to the infield area's loss of integrity. Furthermore, the setting has been substantially altered with the addition of the Card Club and Casino. As a result of all the changes to the property, all the remains left of the original setting is the most basic configuration and spatial relationship—that is, a grandstand in relationship to an oval racetrack. The historic setting of the property has been eroded.

Materials. “Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. A property must retain the key exterior materials dating from the period of its historic significance.” The addition of the fifth floor to the roof of the Clubhouse tower, Turf Club and Clubhouse wing had an especially deleterious effect on architect Arthur Froehlich's 1950 design, as noted in HRG Memorandum and Table 1 on Page 39 of the Historic Resources Technical Report. Also, the exterior elevator to the Turf Club staircase tower was added; the erection of an exterior perforated wall south of the Turf Club staircase tower; the construction of the sloping ski jump-like canopy between the Clubhouse entrance staircases; the covering of all square louvered windows with “owner's silks” on the Main Building's west elevation; the enclosure of the Clubhouse loggia; the addition of red brick planters fronting the Main Building's entrance areas; the construction of the Regency style Turf Club pavilion elevator entrance; and the removal of the semi-abstract herd of galloping metal racehorses from the large bezeled zigzag plaster panel centering the Clubhouse tower ramps. Additional impacts to the surrounding site include the alterations to the lakes and landscaping of the infield track; the relocation of the Paddock to the Main Building's front entrance area; the replacement of virtually all of the original barns, stables, and dormitories located on the east side of the racetrack and the complete remodeling of the food and beverage concession areas, pari-mutual betting windows, and other public areas of the Main Building. Given all of the changes at the property, most of the historic materials do not remain.

Workmanship. “Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or pre-history.” As noted on Page IV. E-19 of the DEIR, “The Main Building of Hollywood Park is a good example of a large building designed in the Late Moderne architectural style typical of the early post-war years in Southern California.” However, as discussed on Page IV. E-24 of the DEIR, “The various alternations have largely affected much of the original workmanship of the Late Moderne detailing. The building's affected Late Moderne elements have included the horizontal emphasis, primarily achieved by the continuous window bands of the curbed Clubhouse tower (since altered by the addition of the fifth floor); the cantilevered, curved Clubhouse fourth floor canopy (similarly affected by the fifth floor addition); the grid of square windows framed by prominent bezels on the grandstand's west elevation (since covered); the wide bezeled fourth floor window located south of the Clubhouse tower; and the projecting curved canopy with oval cutout at the top of the Clubhouse entry staircase (negatively impacted by the addition of a sloping escalator canopy).” The historic workmanship does not remain.

Feeling and Association. “Feeling is a property’s expression of the aesthetic or historic sense of a particular period of time,” while “[a]ssociation is the direct link between an important historic event or person and a historic property.” As provided in the National Register Bulletin, “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register as noted in the Bulletin.” As described in Historic Resources Technical Report, only the most basic feeling and association remains – that is the racetrack in its position and orientation to the grandstand. However, the property does not retain other physical features that would convey its historic feeling and character due to all of the alterations and additions described above.

While a few aspects of integrity (location, feeling and association) are met only in the most basic sense, as noted in National Register Bulletin #15, to “retain historic integrity will always possess several, and usually most, of the aspects.” On balance, the property does not possess most of the aspects of integrity and as such does not maintain sufficient integrity to qualify for listing on the National Register.

Please refer to Response 9.15 for a discussion of why the Property does not meet the significance or integrity thresholds under National Register Criterion B (Persons).

COMMENT 9.19

The DEIR notes that one of the tears in the fabric of integrity is the moving of the Winners Circle and Paddock - but the Bulletin would consider that irrelevant, since the function remains the same and a spatial and functional relationship continue to exist. The DEIR should address this.

RESPONSE 9.19

As discussed in the “Regulatory Setting” on Page IV.E-2 of the Draft EIR, and in Response 9.17, there are seven aspects of integrity. The comment is correct in noting that although the Winners Circle and Paddock were moved, some of the aspects of integrity remain. For example it still functions as a winners circle. However, the Bulletin requires that “several, and usually most” of the aspects of the integrity must be present in order for the property to pass the integrity evaluation as a historic resource.

With respect to location, the Winner’s Circle and Paddock is not in its original location. With respect to design, workmanship and materials, as provided on Page IV.E-17 through IV.E-19 of the Draft EIR, “In the 1950 reconstruction, the Paddock was relocated to its current location. Today, the Paddock includes a walking ring that is situated in the plaza area outside the grandstand near Hollywood Park’s main pedestrian entrance pavilions. The former indoor Paddock was reconfigured and the circular space filled with offices and maintenance facilities.” As a result, the original design, workmanship and materials of the Paddock do not remain. With respect to setting, the relationship to surrounding features and open space has changed given that the former Paddock was configured and transformed into offices and

maintenance facilities. Finally, as stated in the comment, since the Winner's Circle and Paddock still maintains its original function, the feeling and association remain.

Overall, while the Winner's Circle and Paddock continue to exist, they have been relocated and altered to such a degree that they no longer contribute to the historic character of the property. The changes to the Winner's Circle and Paddock contribute to the overall erosion of historic integrity of the property. Because the Winner's Circle and Paddock do not retain their original location, design, materials, workmanship and setting, it does not meet the characteristics of overall historic integrity. A property either possess historic integrity or it does not. Not enough of the historic fabric remains to constitute a finding of eligibility for listing in the National Register.

COMMENT 9.20

The site's landscape is dismissed as a part of the historic fabric, but there is no substantial evidence presented for this conclusion. The landscape is not evaluated in terms of its adherence to the original landscape design (and the 2005 HRH (sic) Report notes that the original landscape architect was very prominent), the age and condition of the trees, the condition of the infield (which was restored and its lakes dredged). The landscape is an integral part of the District and deserves to be evaluated as part of the fabric of the place. It is also the setting and context of several objects (memorials) that historic value. The DEIR should address this. Reevaluation of the potentially historic landscape may result in a significance conclusion different from that contained in the DEIR.

RESPONSE 9.20

While the comment is correct in noting that the 2005 HRG Memorandum states that the original landscape architect was very prominent, it fails to note that the HRG's assessment also concluded that "it is unlikely that any of the landscape features on the property are historically significant. Much of the landscaping was part of the major renovations in the early 1990s." The Historic Resources Technical Report prepared by Page & Turnbull report also arrives at the same conclusion, as noted on Pages 55 – 60 of the Historic Resources Technical Report (Appendix E-1 of the Draft EIR). In documenting the history, significance and integrity of Hollywood Park, the landscape features were examined as part of the Historic Resources Technical Report. The majority of the Project Site's landscape features, including the infield of the Main Track and the area surrounding the Main Entry, were assessed and determined to have been drastically altered from its original design, form, and layout. The "restoration" of the infield was not completed according to the designs of the original landscape architect Edward Huntsman-Trout, nor was it sensitive to the original character of this feature.

The Historic Resources Technical Report provides aerial photographs of the property from 1938 to 2007 and contains a discussion of the changes to landscaping throughout the years that verifies that none of the historic landscaping remains on the property. Please refer to Pages 55-60 of the Historic Resources Technical Report to review the aerial photographs of the property documenting the changes to the landscaping and other site characteristics from 1938 to 2007.

COMMENT 9.21

While the historic resources evaluation(s) are important resource, they are not the only resources which should be consulted and relied upon in the development of the EIR section. The lack of footnotes and a reference page make it difficult to evaluate what other documents may have been consulted. This should be clarified. Where criteria are referenced, they should be quote verbatim and defined pursuant to the National Register publications so that accurate conclusions can be drawn. It would be reasonable to question the underlying study and request additional investigation, definition, and evaluation prior to finalizing this section.

RESPONSE 9.21

As noted on Page IV.E-1 in the DEIR, the analysis pertaining to historic significance is based on the Historic Resources Technical Report by Page & Turnbull, Inc., which is included in its entirety in Appendix E-1 of the Draft EIR and contains a list of references cited in Section X, References Cited on page 51.

COMMENT 9.22***Geology***

To be legally adequate under CEQA, an analysis of the potential environmental impacts of the proposed project is required. It is not sufficient for the EIR section to merely summarize existing geotechnical documents. This is a fatal flaw in the document.

RESPONSE 9.22

The commenter incorrectly suggests that the analysis of the geologic impacts in Section IV. C merely summarizes existing geotechnical documents and therefore render the Draft EIR fatally flawed. Group Delta and Geomatrix performed a site-specific geotechnical investigation of the Project Site to determine the environmental impacts of the Project. This detailed analysis includes on-site soil borings, trenching, and a site-specific seismic study. As shown in Appendix C-1, C-2 and Section IV.C of the Draft EIR, the geotechnical reports are not “existing geotechnical documents” as they were prepared specifically for the Project Site location and the proposed characteristics of the Project. Furthermore, as shown on pages IV.C-13 through IV.C-26 of the Draft EIR, the geotechnical documents were used to evaluate the potential impacts against all of thresholds of significance in accordance with Appendix G to the State CEQA Guidelines. Specifically, the Draft EIR utilized the professional geotechnical studies to formulate environmental impact statements per CEQA for the following issue areas: fault rupture, seismic-induced ground shaking, seismic-induced settlement and liquefaction, landslides, erosion and topsoil, expansive soils, site preparation/grading, geologic hazards, and groundwater. Pages IV.C-22 through IV.C-26 include code-required and project-specific mitigation measures that would ensure all impacts with respect to geology/soils would be reduced to the maximum extent feasible. Accordingly, the environmental

analysis presented in Section IV.C, Geology/Soils, is considered complete and it meets the statutory requirements of CEQA. No further response is required.

COMMENT 9.23

There is no regulatory setting. For the reader to understand the context of the information presented in an EIR, it is necessary to describe the applicable state and local policies, ordinances, codes, and laws pertaining to the particular environmental issue being examined relative to the proposed project. The City's General Plan, Zoning Ordinance, Municipal Code, California Building Code, the Alquist-Priolo Earthquake Fault Zoning Act, the Seismic Hazards Mapping Act, CCR Title 14, Division 2, Chapter 4, Development, Regulation, and Conservation of Oil and Gas Resources should all be addressed under the regulatory setting.

RESPONSE 9.23

Pages IV.C-1 through IV.C-13 of the Draft EIR provides an extensive environmental setting to help frame the existing conditions for the reader. In addition, the Final EIR has been updated with more details of the regulatory setting to help frame the issues presented in the analysis. Specifically, the Safety Element of the City's General Plan, the Inglewood Municipal Code, the California Building Code as adopted by the City's Building Code, the Alquist-Priolo Earthquake Fault Zoning Act, the Seismic Hazards Mapping Act, and the California Code of Regulations Title 14, Division 2, Chapter 4, Development, Regulation, and Conservation of Oil and Gas Resources are all addressed under the regulatory setting.

COMMENT 9.24

Page IV.C-1

No regional geologic context is provided.

RESPONSE 9.24

Page IV.C-1 of the Draft EIR includes a thorough discussion of the geologic conditions and topography of the Project Site. As noted therein, the Project Site is located within the Rosecrans Hills physiographic region of Los Angeles County and within the Los Angeles shelf. The Project Site is located north of the Baldwin Hills and on the west flanks of the Potrero Hills. Additionally, Page IV. C-10 describes the regional geologic seismic conditions for the Project and Figure IV. C-6 depicts the Project Site location within the context of the Alquist-Priolo Special Fault Studies Zone Map.

However, in response to the comment, additional information regarding the regional geologic context is updated in the Final EIR. Specifically, the discussion addresses the Project Site's location within the greater Los Angeles basin including its relationship to mountain ranges, regional fault lines, and soil characteristics. See the Additions and Corrections Section of the Final EIR.

COMMENT 9.25

A graphic showing the location and relationships of the named geologic and topographic features should be used to make the text more meaningful to the reader.

RESPONSE 9.25

A topographical map is provided in Figure IV.C-1, USGS Quadrangle Vicinity Map of the Draft EIR. In addition, the Draft EIR and appendices cite the United States Geological Survey which has an interactive website (<http://www.usgs.gov>) that can be used by the reader as an effective avenue to research the Project Site and surroundings for supplemental information beyond the adequate information already presented in the Draft EIR. In addition, the Final EIR has updated to include a regional map showing geologic and topographic features in the region.

COMMENT 9.26

Page IV.C-2

The first paragraph of *Subsurface Soil Conditions* is misplaced - it describes surface conditions.

RESPONSE 9.26

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the only subheading on page IV.C-2 will be modified to read: **Subsurface** Soil Conditions.

COMMENT 9.27

The description of subsurface soil conditions is a good summary of information included in the Group Delta Consultants geotechnical report of March 29, 2007, but the cross-sections incorporated from that report probably are largely meaningless to the non-technical reader without more explanation of what is provided. Technical material is available in Appendix C-2 of the EIR, where it can be examined by interested geologists and engineers (but is likely not sufficiently explained for the non-technical reader). The "Subsurface Soil Conditions" paragraphs would more useful if re-summarized without the cross-sections.

RESPONSE 9.27

This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the sufficiency of environmental analysis and this does not require any further response.

COMMENT 9.28

Pages IV.C-10:

More discussion regarding seismicity in a regional and local context should be included in the descriptions included under Groundwater, Liquefaction, and Seismic.

RESPONSE 9.28

Please see Response 9.24 for a discussion of the information included in the Final EIR with regard to describing the regional and local context with regard to seismicity.

COMMENT 9.29

Page IV.C-12

Figure IV.C-7 (The Restricted Use Zone Across Training Track) is a very poor reproduction of the one in the Geomatrix geologic report of December 16, 2005. Graphics are an excellent way to convey information, but poor graphics are ineffective.

RESPONSE 9.29

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, Figure IV.C-7, RUZ Zone Across Training Track, will be revised to be more legible.

COMMENT 9.30

Page IV.C-13

The “Thresholds of Significance” do not constitute criteria against which impacts can be measured. Criteria listed are exact duplicates of the questions Lead Agencies are asked to consider in the Initial Study process when deciding what sort of environmental document to prepare. There are no metrics associated with these questions that would allow one to assess the level of the potential impact.

RESPONSE 9.30

The thresholds of significance section identified on page IV.C-13 of the Draft EIR are the recommended thresholds in accordance with Appendix G to the State CEQA Guidelines and they reflect the current thresholds of significance utilized by the Lead Agency in assessing project impacts associated with geology and soils. No further response is required.

COMMENT 9.31

Question d) cites the wrong table in a building code that is 13 years out-of-date and never has been in effect in California, although it formerly was the basis for the California Building Code.

RESPONSE 9.31

Question d) in the thresholds of significance section identified on page IV.C-13 of the Draft EIR will be updated in the Final EIR to reference the most current Uniform Building Code and the applicable table. Specifically, question d) will be amended to read:

- d) Be located on expansive soil, as defined in Table 18-1-BA of the Uniform Building Code (19942001), creating substantial risks to life or property?

COMMENT 9.32

Page IV.C-14

Project Impacts states “...additional explorations, testing, and analyses will be required in order to develop building-specific foundation recommendations.” Although it probably not intended, this could be interpreted under CEQA as deferred mitigation. Some explanation of the requirements of the City’s Building Code with respect to the design review and site inspection processes (usually in the regulatory setting) is necessary to assure the reader that there is a legal framework in place to regulate these actions and that there is sufficient information available now to analyze the potential environmental impacts of the proposed project.

RESPONSE 9.32

Page IV.C-23 of the Draft EIR includes 19 project specific mitigation measures to ensure the potential impacts associated with geology and soils are reduced to the maximum extent feasible. Specifically, page IV.C-23 states the specific mitigation measures presented therein shall be completed to the satisfaction of the City of Inglewood Department of Building and Safety. This language ensures the Proposed Project will be developed in a consistent manner with all applicable City Building Codes.

Additionally, the discussion under “Project Impacts, Expansive Soils” has been revised to note that the Project would be required to comply with applicable provisions of the California Building Code as adopted by the Inglewood Municipal Code with regard to soil hazard-related design. With adherence to this regulatory framework, the geotechnical engineering recommendations provided in the Geotechnical Report, and implementation of the mitigation measures identified in Section IV. C, impacts with respect to expansive soils would be less than significant.

To ensure the Project will be developed in a manner consistent with the City’s Building Code requirements, Mitigation Measure MM C-7 has been refined to read as follows:

MM C-7 Prior to site grading, the developer shall submit to the City of Inglewood Planning and Building Department a site-specific evaluation of soil conditions that is prepared by a registered soil professional that includes recommendations for ground preparation and earthwork activities specific to the site, soil removal and replacement, and other site-specific earthwork activities and in conformance with the City's Building Code. ~~uncertified fill and soft native soils should be removed and replaced with structural fill. It should be anticipated that unsuitable oversized debris may be present in the existing fill on site. The actual limits for removals should be determined by the project Geotechnical Engineer depending on the actual conditions encountered, consistent with the findings of a site specific geotechnical evaluation.~~

COMMENT 9.33

The first paragraph of Fault Rupture belongs in Environmental Setting. The bullet list belongs in Design Features. The last paragraph is more or less “mitigation,” although the requirement to “incorporate appropriate engineering design to mitigate movement resulting from potential future displacement related to the Potrero Fault” is a stipulation of the 2007 California Building Code, and therefore does not qualify as a mitigation measure as defined by CEQA.

RESPONSE 9.33

The information continued in the first paragraph of the “Fault Rupture” section is now included in the “Environmental Setting” discussion as shown in the Additions and Corrections Section of the Final EIR. The bullet list referenced in the comment has already been included in the Project Design Features. Please refer to PDF C-1 in the Draft EIR.

The Draft EIR includes certain regulatory requirements, including applicable local, state or federal regulations, as Mitigation Measures or Project Design Features to ensure the Project's compliance with these regulations and to facilitate monitoring of their implementation. This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require any further response.

COMMENT 9.34

Page IV.C-16

Seismic-Induced Settlement and Liquefaction does not address the issue of depth to groundwater.

RESPONSE 9.34

Page IV.C-20 addresses the depth to groundwater. Groundwater was not encountered during Group Delta Consultant's field exploration, to the maximum of 75 feet explored. However, groundwater was

encountered by EKI, Inc. during subsurface investigations on the Project site between 70 to 170 feet below ground surface (bgs). Specifically, averaged recorded data by EKI Inc. suggest that groundwater on the Project site ranges between 95 feet bgs in the Parking Area, to 123 feet bgs in the Main Track Area, to 180 feet bgs in the Stables Area. Based on subsurface investigations performed by EKI, Inc., groundwater is not likely to be encountered within the depth of the proposed excavation. The Draft EIR further states that compliance with the geotechnical recommendations provided by the project engineer would effectively mitigate any adverse impacts associated with groundwater to less than significant levels.

COMMENT 9.35

Page IV.C-17

Site Preparation/Grading/Earth Removal introduces excavation that would extend to 22.5 feet below the ground surface for the first time. A discussion regarding excavations should be included in the missing regulatory setting section as part of an explanation of the City's policies and ordinances pertaining to grading.

RESPONSE 9.35

Please refer to Response 9.24 for a discussion of the updates made to the "Regulatory Setting" discussion in the Final EIR. As discussed therein, earthwork activities, including grading, are governed by the "Building Code of and for the City of Inglewood" in the Inglewood Municipal Code. The Building Code is found in Article 2, Chapter 11. In accordance with the procedure designated in Sections 50001 et seq., of the Government Code of the State of California, and subject to particular additions, deletions and amendments set forth in the IMC, the IMC adopts by reference the "California Building Code, 2001 Edition," Volumes 1, 2, based on the Uniform Building Code, 1997 Edition as the "Building Code of and for the City of Inglewood."

Also, refer to Response 9.32 for a discussion of the revisions made to Mitigation Measure MM C-7, which will ensure the Project will be developed in a manner consistent with the City's Building Code requirements.

The Draft EIR further states that compliance with the geotechnical recommendations provided by the soils engineer would effectively mitigate any adverse impacts associated with site preparation/grading/earth to less than significant levels. This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT 9.36

Site Preparation/Grading/Earth Removal introduces abandoned oil wells for the first time. A discussion regarding oil wells should be included in the missing regulatory setting section as part of an explanation of the state regulations pertaining to gas and oils wells.

RESPONSE 9.36

Please refer to Response 9.24 for a discussion of the updates made to the “Regulatory Setting” section. The discussion includes an explanation of the state regulations related to abandonment of oil wells. Section 3200, et seq., of the Public Resources Code regulates the permitting, establishment, completion, and abandonment/re-abandonment of gas and oil wells. The Division of Oil, Gas, and Geothermal Resources (DOGGR) is the state agency with primary responsibility for the enforcement of these regulations. DOGGR is also the state agency responsible for conducting construction site plan review for development proposed in proximity to gas or oil wells. In the event wells or casings are found during excavation and grading activities, proper abandonment may be required by DOGGR under CCR Title 14.

COMMENT 9.37

Which Thresholds of Significance does Site Preparation/Grading/Earth Removal address?

RESPONSE 9.37

The process of site preparation/grading/earth removal has the potential to result in impacts related to soil erosion or the loss of topsoil (Threshold (b)), or landslide, lateral spreading, subsidence, liquefaction or collapse (Threshold (c)). All of these issues, and others, are included in the thresholds of significance and are discussed under the heading “Project Impacts” beginning on Page IV. C-14 in the Draft EIR.

COMMENT 9.38

Geologic Hazards states, “Potentially adverse impacts associated with this hazard [the accidental discovery of undocumented and/or abandoned oil wells] could be reduced to a less-than-significant level...” No explanation/examination/analysis of those impacts, governing regulations, or general techniques used to remediate them and the effects of the remediation were included in the document. No substantial evidence is presented and the presence of oil wells must be evaluated as a potential risk to future uses at the project site.

RESPONSE 9.38

This comment accurately restates the environmental impact statement in Section IV.C, Geology/Soils found on Page IV.C-20 of the Draft EIR. However, the Draft EIR also included a more detailed analysis of the potential impacts associated with oil wells in Section IV.D, Hazardous Materials/Risk of Upset. Specifically, pages IV.D-19, IV.D-25, and IV.D-30 include discussions on the environmental setting for oil field areas, the potential impacts to be assessed prior to grading, and mitigation measures, respectively. There are six known dry oil wells on the Project site. These oil wells never actively produced oil and are therefore not a potential risk to future uses proposed for the Project Site with proper reabandonment. The Proposed Project includes mitigation measure MM D-4 on Page IV.D-30, which requires that former oil and gas wells at the property shall be located, inspected, and reabandoned, if necessary, as required by

DOGGR consistent with proximate land use. Accordingly, this issue was adequately analyzed in the Draft EIR and no further response is required.

COMMENT 9.39

An explanation of the regulations governing the disposal of dewatering discharge should be included in the missing regulatory setting section. Groundwater introduces for the first time the possibility of needing to dewater the perched water table and explains at least one method that could be used, but does not analyze the potential impacts or the Regional Water Quality Control Board requirements (there should, at least, be a citation to Section IV.F. Hydrology for further information

RESPONSE 9.39

While the recorded groundwater depth is well below the proposed maximum depth of soils removal, it is possible that locally perched groundwater could be encountered near and beneath the existing lake in the center of the Main Track and has the potential to impact the proposed development during construction. During construction, it may be necessary to provide temporary groundwater control provisions in order to allow for the proposed excavation.

Given this, the “Regulatory Setting” section has been updated to include an explanation of the regulations governing the disposal of dewatering discharge. The analysis of the potential impacts of the Regional Water Quality Control Board requirements is included in Section Ivg. F. Hydrology/Water Quality. A cross-reference to this information has been provided in the updates to the “Regulatory Setting” discussion.

COMMENT 9.40

Land Use Equivalency Program belongs in Section IV.I. Land Use.

RESPONSE 9.40

This comment suggests the Draft EIR should be reorganized. Each section in Section IV. Environmental Impact Analysis contains a discussion of the impacts of the Equivalency Program with respect to the environmental impact being analyzed in the section. This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require any further response.

COMMENT 9.41

The statement that Cumulative Impacts would be less-than-significant is correct, but the explanation is faulty: No federal regulations involved, the Land Use Equivalency Program is irrelevant, and the core regulatory requirement - the 2007 California Building Code, as enforced through the City of Inglewood

Municipal Code - is not mentioned.

RESPONSE 9.41

This comment acknowledges the Draft EIR correctly concluded that cumulative geology/soils impacts would be less than significant. Page IV.C-22 of the Draft EIR provides an adequate discussion relating to cumulative impacts, and specifically, the discussion references the site-specific measures that would be required at the project-specific level. As stated on Page IV.C-22 of the Draft EIR, “Cumulative development in the area would increase the overall population for exposure to seismic hazards by increasing the number of people potentially exposed. However, with adherence to applicable State and Federal regulations, building codes and sound engineering practices, geologic hazards could be reduced to less-than-significant levels.”

Those measures referenced include all of the code-required and project-specific mitigation measures, including MM C-1, which states conformance to the California Building Code, among others, would be required.

COMMENT 9.42

Project Design Features belongs in Section II Project Description. If the features described in PDF C-1 are part of the proposed project, they would be adopted as such if the project were approved and there would be no need to adopt them as separate conditions of approval. In any case, the City’s Building Code requires appropriate geotechnical engineering, irrespective of whether a project application claims it as a “design feature” or whether the proposed structures are in the RUZ.

RESPONSE 9.42

Project Design Features are called out to facilitate their implementation and monitoring. This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require any further response.

COMMENT 9.43

MM C-1 is not a mitigation measure - it is a legal requirement for which no discretionary action is necessary or permitted.

RESPONSE 9.43

It is not clear what is meant by the statement “no discretionary action is necessary or permitted.” Mitigation Measure MM C-1 mandates adherence to applicable codes. It is included as a mitigation measure to facilitate implementation and monitoring. This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific

challenge or objection pertaining to the sufficiency of the environmental analysis and this does not require any further response.

COMMENT 9.44

MM C-2 through MM C-20 are not mitigation measures - they are re-iterations of the standard site engineering practices which appear in the Delta Group Consultants geotechnical report of March 29, 2007, and virtually every other geotechnical report dealing with site preparation, grading, excavation, and construction. They are formulated to respond to the standards set by the 2007 California Building Code, as enforced through the City of Inglewood's Municipal Code, and are required, irrespective of whether a project application claims them as mitigation.

RESPONSE 9.44

It is not clear why the commenter objects to the Project Applicant "claiming" mitigation. The measure described in mitigation measures MM C-2 through C-20 will ensure geologic impacts are less than significant. This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the sufficiency of the environmental analysis and this does not require any further response.

COMMENT 9.45

Given that no impacts have been identified and that the "mitigation measures" are already required by existing laws, the presentation in Level of Significance After Mitigation is irrelevant.

RESPONSE 9.45

This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require any further response.

COMMENT 9.46***Hazardous Materials***

There are nine individual sites addressed under regulatory agency oversight or previously closed in the Hazardous Materials section. Of the sites, three will be remediated before construction, three will be remediated during grading, and three will be sampled after grading. If the site is not fully remediated prior to issuance of grading permits, a significant risk to construction workers could occur, a potentially significant impact. Mitigation should be included that requires that all remediation activities occur prior to grading.

RESPONSE 9.46

The Draft EIR includes a summary of the regulatory process required for grading and earthwork activities in areas that may contain soil contamination or other environmental hazards. The Proposed Project has prepared a Soil Management Plan that requires approval and implementation oversight by the Regional Water Quality Control Board. There is no basis for the assertion that the site must be “fully” remediated prior to issuance of grading permits or a “significant risk to construction workers would occur.” The current process for soil remediation, where necessary, is accurately and sufficiently disclosed in the Draft EIR on Page IV.D-2. As discussed, the purpose of the SMP is to address localized areas of concern, if they arise, during demolition or grading activities. Remediation in accordance with Regional Water Quality Control Board oversight could occur in a localized impacted area of the site where an issue arises, while construction activity can take place on other areas of the site that have no hazardous issues. In many cases, grading and remediation will happen simultaneously. All remediation activities will be overseen by the Regional Water Quality Control Board, ensuring that there will be no health hazards to construction workers. Moreover, the Draft EIR includes Mitigation Measures D-1 through D-7 which would ensure compliance with all federal, state and local regulations associated with hazardous materials.

COMMENT 9.47***Hydrology***

Mitigation Measures are not recommended - they are required.

RESPONSE 9.47

Pursuant to Section 21081.6 of the Public Resources Code:

“The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.”

Some Lead Agencies may choose to alter or revise the recommended mitigation measures through the course of the public review period up until final project approvals. As part of final project approvals, mitigation measures will be required as a condition for approval to mitigate impacts of the project, as determined appropriate by the Lead Agency.

COMMENT 9.48

The DEIR is missing discussion of some threshold criteria - according to the text, only threshold (i) was scoped out. Still missing discussion of (b), (d), (e), (g), (h), and (j).

RESPONSE 9.48

In accordance with Appendix G to the State CEQA Guidelines, a project would have a significant impact on the environment if it would:

- a) Violate any water quality standards or waste discharge requirements;
- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);
- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- e) Create or contribute runoff water that would exceed the capacity of existing planned stormwater drainage systems or provide substantial additional sources of polluted runoff;
- f) Otherwise substantially degrade water quality;
- g) Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- h) Place within a 100-year flood plain structures which would impede or redirect flood flows;
- i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.

As discussed by the commenter, threshold question (i) does not apply to this analysis because there are no major dams or waterways located on or near the Project Site. Therefore, there are no impacts associated with the risk of flooding from dam failure and no further analysis on this issue is required.

With respect to threshold question (a), the Proposed Project would not violate any water quality standards or waste discharge requirements. Implementation of identified PDF's and mitigation measures are recommended to reduce impacts related to polluted runoff would ensure that the Proposed Project is designed and developed in a manner that ensures water quality standards are met. Discussion on threshold question (a) can be found on Page IV.F-26 through Page IV.F-36.

With respect to threshold questions (b), the Proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table levels (see Appendix F-6 to this Draft EIR regarding groundwater). Since the historical shallow groundwater level at the site is deeper than 50 feet impacts to groundwater caused by infiltration of irrigation water and treated urban runoff is considered less than significant. Groundwater quality will be fully protected through implementation of the Project's site design, source control, and treatment control PDFs prior to reaching groundwater. The proposed increase in effective imperviousness (due to both the addition of drainage area that is not retained, as well as the increase in impervious surface area) would not substantially interfere with groundwater recharge. Discussion of threshold question (b) can be found on Page IV.F-36 and Page IV.F-37.

With respect to threshold question (c), the Proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or offsite. The Project Site does not contain a stream or river. Implementation of identified PDF's and mitigation measures are recommended to reduce impacts related to erosion and siltation would ensure that the Proposed Project is designed and developed in a manner that ensures water quality and hydrology impacts are minimized to insignificant levels. Discussion on threshold question (c) can be found on Page IV.F-24 through Page IV.F-26.

With respect to threshold question (d), the Proposed Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site. The Project Site does not contain a stream or river. Implementation of identified PDF's (which include hydrologic source controls and treatment control BMP's to ensure stormwater runoff volumes are adequately managed) would ensure that the Proposed Project is designed and developed in a manner that ensures that flood hazard is mitigated. Thus, impacts would be less than significant. Discussion on threshold question (d) can be found on Page IV.F-17 through Page IV.F-26.

With respect to threshold question (e), the Proposed Project would not create or contribute runoff water that would exceed the capacity of existing planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Implementation of identified PDF's (which include hydrologic source controls and treatment control BMP's to ensure stormwater runoff volumes are adequately managed, as well as mitigation measures designed to reduce impacts related to polluted runoff during project construction and operation) would ensure that the Proposed Project is designed and developed in a manner that ensures storm drain systems are not adversely impacted, and runoff is not polluted. Thus,

impacts would be less than significant. Discussion on threshold question (e) can be found on Page IV.F-17 through Page IV.F-26.

With respect to threshold question (f), the Proposed Project would not otherwise substantially degrade water quality. As previously discussed, implementation of identified PDF's and mitigation measures are recommended to reduce impacts related to polluted runoff would ensure that the Proposed Project is designed and developed in a manner that ensures water quality standards are met.

With respect to threshold question (g), the Proposed Project would not place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

With respect to threshold question (h), the Proposed Project would not place within a 100-year floor plain structures which would impede or redirect flood flows.

With respect to threshold question (j), the Proposed Project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. Group Delta Consultants prepared an additional study related to the potential geologic hazards of tsunami, seiche, and mudslide and the Project Site. A copy of the study is provided in Appendix O of the Final EIR.

As discussed in the supplemental Group Delta Consultants study, all low-lying areas along California's coast are subject to potentially dangerous tsunamis, which are long period waves generated primarily from distant and local offshore earthquakes, landslides, or volcanic eruptions. Legg et al. (2002) conducted a study to evaluate the tsunami risk to Southern California coastal cities and predicted that "maximum run-up exceeded one meter along most of the coast between Santa Monica and Dana Point, with peaks of 1.5 to 2.2 meters at Marina del Rey, Redondo Beach, Los Angeles and Long Beach harbors, and the Orange County coast from Seal Beach to Newport Beach." The Project Site is located 5.5 miles from the coastline and the existing grade of the Site is 80 to 140 feet higher than the predicted maximum run-up. Therefore, the Project would result in a less than significant impact with respect to exposing people of structures to a significant risk of loss or death from tsunami.

As noted in the Initial Study Checklist (see Page 26), the City of Inglewood is not located along a large body of water, such as an ocean or lake, in which a seiche would occur. Therefore, the Project would result in a less than significant impact with respect to exposing people of structures to a significant risk of loss or death from seiche.

The supplemental study provided by Group Delta Consultants also addresses the risk of loss resulting from mudslide. The Project Site is not located within an area where previous landslide movement occurred, or within an area where local topographic, geologic and subsurface water conditions indicate a potential for permanent ground displacement may occur. Therefore the Project would result in a less than

significant impact with respect to exposing people or structures to a significant risk of loss or death from mudslide.

COMMENT 9.49

(Page 47) Stating that the PDFs should be incorporated as a condition of project approval is a mitigation measure -- not a general description -- and must be a requirement; therefore, they must be incorporated, unless the PDFs are incorporated, at least by reference, as part of the project description -- at which point, they do not need to be a condition of project approval. If they are not incorporated as part of the project, the project analysis cannot assume these are part of the project and must be Mitigation Measures -- or, the requirement that PDFs are a condition of approval must be a Mitigation Measure and it must be stated up front in the discussion analysis; the impacts are all potentially significant, but incorporation of the MM requiring PDFs reduce significance to less than significant. If not mitigated, the impacts would remain significant.

RESPONSE 9.49

It is not clear what legal source the commenter is relying on in making the assertion that PDFs may not be adopted as conditions of approval. The PDFs listed are part of the Project design and Specific Plan. The Draft EIR indicated on Page IV.F-47 that these measures “are proposed to be incorporated into the project description.” They are also proposed to be included as conditions of approval to facilitate implementation and monitoring of the specified features.

COMMENT 9.50

Mitigation Measures should be referenced in the appropriate text, where they apply, to reduce significant or potentially significant impact to less-than-significant levels.

RESPONSE 9.50

This comment suggests the Draft EIR should be reorganized. This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require any further response.

COMMENT 9.51

The acreage for the Dominguez Watershed should be reconciled; references to 133 and 110 square miles are obviously inconsistent.

RESPONSE 9.51

The acreage for the Dominguez Watershed is listed as 110 square miles, as found on LA County

Department of Public Works website. The Additions and Corrections Section of the Final EIR will be updated to reflect this.

COMMENT 9.52

List of impairments and sediment toxicity (cause not identified) impairment are missing for the Dominguez Channel.

RESPONSE 9.52

The list of impairments and sediment toxicity impairment can be found in Appendix F-3, Water Quality Technical Report (WQTR), of the DEIR. As stated in WQTR, Table 2-2 on Page 4 lists the following:

**Table II-1
Receiving Waters and Their Corresponding Impairment and Beneficial Use**

Receiving waters	2006 303(d) Impairment List	Beneficial Use
Dominguez Channel (above Vermont)	ammonia, indicator bacteria, copper (sediment), dieldrin (tissue), lead (tissue), sediment toxicity, zinc (sediment)	MUN ¹ , REC1 ¹ , REC2, WARM ¹ , WILD ¹ , RARE
Dominguez Channel Estuary (to Vermont)	ammonia, benthic comm. effects, benzo(a)pyrene (PAHs), benzo(a)anthracene, chlordane (tissue), chrysene (C1-C4), coliform bacteria, DDT (tissue & sediment), dieldrin (tissue), lead (tissue), PCBs, phenanthrene, pyrene, zinc (sediment)	NAV ¹ , REC1, REC2, COMM, EST, MAR, WILD, RARE, MIGR, SPWN
^a NAV - Navigation	^g EST - Estuarine Habitat	
^b MUN - Municipal and Domestic Supply	^h MAR - Marine Habitat	
^c REC1 - Water Contact Recreation	ⁱ WILD - Terrestrial Wildlife Habitat	
^d REC2 - Non-Water Contact Recreation	^j RARE - Rare, Threatened, or Endangered Species	
^e WARM - Warm Freshwater Habitat	^k MIGR - Migration of Aquatic Organisms	
^f COMM - Commercial and Sport Fishing	^l SPWN - Spawning, Reproduction, and/or Early Development	
¹ Potential beneficial use.		

COMMENT 9.53

Beneficial and potential beneficial uses should be reconciled with the WQTR; non-water contact recreation is a beneficial use in the WQTR, but is listed as a potential beneficial use in the DEIR.

RESPONSE 9.53

The table below lists the beneficial uses for the Dominguez Channel with respect to water contact recreation (REC1) and non-water contact recreation (REC2).

	DOMINGUEZ CHANNEL	DOMINGUEZ CHANNEL ESTUARY
REC1 – water contact recreation	Potential beneficial use	Beneficial use
REC2 – non-water contact recreation	Beneficial use	Beneficial use

COMMENT 9.54

A 25-year storm event does not have a 100 percent chance of happening every 24 years; this statement is incorrect. A 25-year storm event has a 4 percent chance of occurring within any given year. This should be revised.

RESPONSE 9.54

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Please refer to the modified sentence in Response 2.9.

COMMENT 9.55

Existing site runoff is not 2,780.5 cfs; it is 280.5 cfs. This should be revised.

RESPONSE 9.55

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly to correct the typographical error. Specifically, the fifth sentence in the first paragraph on page IV.F-6 will be modified to read as follows: “Using the LACDPW Inglewood 25-year storm, 24-hour isohyet (4.6 inches) and associated runoff coefficient curve for the existing soil type 013, the report determined that the existing site contributes a runoff total of ~~2780.5~~280.5 cubic feet per second (cfs) to the offsite storm drain system during a 25-year storm event.”

COMMENT 9.56

The size of the proposed lake should be stated and that it treats approximately 82 acres of residential land uses and associated roadways.

RESPONSE 9.56

The upper lake, covering approximately one acre, will be shallow and densely vegetated with wetland

plants, while the lower lake, covering approximately three acres will be deeper with a bulk head and some vegetation along its perimeter. The lake will accept runoff from a total of approximately 153 acres, including 82 acres of residential and roadway development in addition to runoff that is first treated by BMPs in Arroyo Park (approximately 71 acres). See Figure IV.F-2 on Page IV.F-19 of the Draft EIR.

COMMENT 9.57

Flow-based BMPs are not sized using a rainfall intensity of 0.2 inches per hour. They are sized using criteria 3 to result in the treatment of the same proportion of runoff as volumetric BMPs, at least 80 percent of runoff. This should be corrected.

RESPONSE 9.57

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the first sentence in the third paragraph on page IV.F-21 will be modified to read as follows: “Flow-based BMPs for the Proposed Project will be sized using a ~~rainfall intensity of 0.2 inches per hour~~ criteria 3, which will result in treatment of the same portion of runoff (ie: at least 80%) as using volumetric standards described above.”

COMMENT 9.58

Suggest second to last sentence on page, insert “natural” before ultraviolet light for clarify, or a reader could reasonably assume a UV treatment system would be employed.

RESPONSE 9.58

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the fifth sentence in the fourth paragraph on page IV.F-23 will be modified to read as follows: Some pathogens would be removed through natural ultraviolet light degradation.

COMMENT 9.59

First paragraph on page 25 of this section is incorrect. The table does not show that there would be a reduction in runoff. The Project PDFs do not reduce impervious area by 55 percent. The existing impervious area is effectively 47% because about 50% of the site is completely contained and does not contribute to off-site runoff. The proposed plus PDFs impervious area is 73%. The proposed project plus PDFs would increase runoff by 55%. The 25% reduction in runoff by the swales is included in the runoff calculations/model that results in the 55 % increase in runoff. The additional volumes from evapotranspiration were correctly stated to not be accounted for in the model and could contribute to reductions in runoff. Thus, the increase in runoff would not likely be as great as modeled.

RESPONSE 9.59

As noted in the comment, the Proposed Project plus PDFs would increase runoff by 55%. Table IV.F-4, on Page IV.F-25, does not mean to suggest that the project with PDFs would reduce impervious area by 55%. To clarify this point, the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the second sentence on Page IV.F-25 will be modified to read as follows: “Compared to the Proposed Project without PDF’s (73% imperviousness), the Proposed Project with PDF’s would increase runoff by 55%. ~~yields a reduction in percent imperviousness (55%).~~”

COMMENT 9.60

Second paragraph on page 25 of this section, the vegetated bio-filtration swales and wet ponds are structural BMPs, not “non-structural” BMPs.

RESPONSE 9.60

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the third sentence in the second paragraph on page IV.F-25 will be modified to read as follows: “These ~~non~~-structural BMP measures will reduce rates of runoff, attenuate flow, and improve the quality of stormwater leaving the site.”

COMMENT 9.61

Second to last or last paragraph on page 25, the size of storage necessary should be included. As modeled in the Hydro report, the Lower Lake must have at least 5.904 acre-feet of storage capacity and the Upper Lake must have at least 1.188 acre-feet of storage capacity.

RESPONSE 9.61

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the first sentence in the third paragraph on page IV.F-25 will be modified to read as follows: “The proposed lake will be designed to have a static water level and will be sized to provide the necessary storage capacity of approximately 6 acre-feet for the lower lake and 1 acre-foot for the upper lake.”

COMMENT 9.62

On page 28, the reference to additional PDF for dewatering is unclear.

RESPONSE 9.62

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended to clarify the Project Design Feature. The PDF to be implemented is designed to protect receiving waters from dewatering and construction related non-stormwater discharges. In terms of

dewatering, construction of some improvements may, though unlikely, require dewatering, which would be carried out in accordance with the requirements of a General Dewatering Permit or other requirements of the Regional Water Quality Control Board. Dewatering discharges are not anticipated to violate any water quality standards or waste discharge requirements, and any impacts that would result would be less than significant. Specifically, Page IV.F-50 and Page II-30 will be modified to include PDF F-31 as an additional PDF, and will read as follows:

PDF F-31 The project shall be implemented in compliance with the LARWQCB's General Waste Discharge Requirements (WDRs) under Order No. R4-2003-0111, NPDES No. CAG994004 governing construction-related dewatering discharges within the Project Site.

Compliance with PDF F-31 would further assure that the impacts of these discharges are less than significant.

COMMENT 9.63

Also on page 28, the significance of pesticide use is not stated.

RESPONSE 9.63

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, additional sentences will be added at the end of the third paragraph on page IV.F-28 to read as follows: “Based on the incorporation of site design, source control, and treatment control BMPs pursuant to SUSMP requirements and the use of a pest management program, potential post-Project impacts associated with pesticides are considered less than significant. The Construction Stormwater Pollution Prevention Plan must contain sediment and erosion control BMPs pursuant to the General Construction Permit, and those BMPs must effectively control erosion and the discharge of sediment along with other pollutants per the BAT/BCT standards. Based on these sediment controls, construction-related impacts associated with pesticides are considered to be less than significant.”

COMMENT 9.64

On page 29, the significance of hydrocarbons is not stated.

RESPONSE 9.64

The commenter is correct in noting the hydrocarbons significant is not stated in the Hydrocarbons discussion on Page IV F-28 and Page IV F-29.

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, additional sentences will be added at the end of the fourth paragraph

beginning on page IV.F-28 to read as follows: Los Angeles County conducted PAH analyses on 27 stormwater samples from a variety of land uses in the period 1994-2000 (Los Angeles County, 2000). For those land uses where sufficient samples were taken and were above detection levels to estimate statistics, the mean concentrations of individual PAH compounds ranged from 0.04 to 0.83 µg/L. The reported means were less than acute toxicity criteria available from the literature (Suter and Tsao, 1996). Moreover, the Los Angeles County data do not account for any treatment, whereas the treatment in the Project's PDFs should result in a reduction in hydrocarbon concentrations inclusive of PAHs. This makes it very unlikely that impacts will occur to the receiving water due to hydrocarbon loads or concentrations. On this basis, the effect of the Project on petroleum hydrocarbon levels in the receiving waters is considered less than significant."

Furthermore, compliance with the General Construction Permit, the SWPPP for the site will include BMPs for hydrocarbons and will mitigate impacts from hydrocarbons to a level less than significant.

COMMENT 9.65

If turbidity is less than significant, then no mitigation measures are required.

RESPONSE 9.65

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the final sentence of second paragraph on page IV.F-29 will be deleted.

COMMENT 9.66

Mitigation Measures should not be recommended; they are requirements.

RESPONSE 9.66

Please see Response 9.47.

COMMENT 9.67

There are no PDFs related to minimizing zinc or copper roofing materials as set forth in the WQTR (page 32). These should be included.

RESPONSE 9.67

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, Page IV.F-50 and Page II-30 will be modified to include PDF F-32 as an additional PDF, and will read as follows:

PDF F-32. The Project will prohibit the use of certain building materials such as roofing/gutter materials that are high in copper and zinc.

COMMENT 9.68

Land Use

The discussion of the proposed land uses within the Specific Plan, the interface of uses, design guidelines, mobility within the plan, development standards and implementation of the Specific Plan is extremely brief or not included at all. A greater discussion of the Specific Plan should be included within this Section. At a minimum, a table/matrix of the proposed land use and standards should be included.

RESPONSE 9.68

As stated on Page IV.I-29, the Hollywood Park Project would involve adoption of the Hollywood Park Specific Plan to facilitate the planned development of a mixed-use master-planned community. The following is a summary of the Specific Plan, which was provided as a reference to the Draft EIR.

The Specific Plan creates a planned, mixed-use community that contains a diverse range of retail, commercial, residential, open space, civic, hotel, and casino/gaming land uses. Chapter 1 of the Specific Plan contains an introduction and overview of the Specific Plan area. It includes the purpose and vision of the Specific Plan, its location, the community process used to develop the land use plan and the rationale for the land use plan. Specifically, the prime corner for the plan was determined to be the intersection of Century Boulevard and Prairie Avenue because it generates exposure, access and visibility. As a result, this corner was selected as the location for the retail and entertainment center, and the major planning objective was to create a linkage from the prime corner to draw energy into the site. Linkage of the site will be achieved through the creation of a retail “main street” anchored at the prime corner and connecting to a Lake Plaza overlooking the Lake Park. The “main street” linkage is also supported by the linear Arroyo Park connecting to the Bluff Park, which connects the residential neighborhoods to the park system and to the retail and entertainment center.

Chapter 2 of the Specific Plan contains the development standards for the Specific Plan area, and upon adoption of the Specific Plan, will become the governing zoning standards for the land uses within the Specific Plan area. The Specific Plan development standards contain five different land use [zoning] designations: 1) open space, 2) mixed-use, 3) residential, 4) commercial and recreation, and 5) civic. In general, the shapes and locations of individual buildings and building envelopes in which development could occur are limited by restrictions on building heights, density, minimum setbacks, and maximum lot coverage.

Residential Development

The Specific Plan contains four different housing types permitted within the Specific Plan area—Mixed-Use Residential, Single-Family, Townhome, and Wrap/Podium. Some Residential Zone development

standards contained in the Specific Plan in Tables 2-3 and 2-5 are included below:

Table 2-3 Residential Development Table

Housing Type	Maximum Density (gross)	Minimum Number of Dwelling Units	Maximum Number of Dwelling Units**
Mixed-Use Residential*	85.0 du/ac [^]	0	525
Single-Family	15.0 du/ac	275	675
Townhome	30.0 du/ac	900	1,700
Wrap/Podium*	85.0 du/ac [^]	800	1,500
<ul style="list-style-type: none"> * Includes Live/Work and Shopkeeper units ** In no event can total units exceed 2,995 (except for possible equivalency transfers equal to 505 units). The extra 1,405 units represent flexibility within product types. [^] If developed as senior citizen development pursuant to Sections 659150-65918 of the California Government Code, the maximum density may be increased to 105 du/ac. 			

Table 2-5—Residential Zone Development Standards

Standard	Single-Family Housing Type	Townhome Housing Type	Wrap/Podium Housing Type
Maximum Density	Refer to Table 2-3	Refer to Table 2-3	Refer to Table 2-3
Minimum Lot Size*	3,500 square feet*	None	None
Minimum Lot Width/Depth	45 feet/80 feet*	None	None
Public Street/Perimeter Setback	Refer to Exhibit 2-28	Refer to Exhibit 2-28	Refer to Exhibit 2-28
Interior Side and Rear Setbacks**	5 feet***	5 feet***	0 feet
Maximum Lot Coverage	55%	65%	75%
Building Separation	10 feet or per California Building Code	10 feet or per California Building Code	0 feet or per California Building Code
Location of Refuse Storage	Within side yard or garage	Within garage or common area	Within garage or common area
<ul style="list-style-type: none"> * Minimum lot size, width and depth applies to individual, one-family homes with a separate Assessor Parcel Number (APN). ** Interior setbacks apply to only legal lot lines as designated on the Tentative Tract Map. *** The side yard setback may be reduced to 0' through a shared use easement and as long as the 10' cumulative side yard setback/building separation is maintained. 			

Mixed-Use and Non-Residential Development

Some of the development standards for mixed-use and non-residential development (i.e. open space, commercial and recreation, and civic) are provided in Section 2.9 of the Specific Plan and are included in the table below:

Table 2-6—Mixed-Use and Non-Residential Land Use Development Standards

Standard	Mixed-Use	Commercial and Recreation	Civic	Open Space
Maximum Density (gross)	Refer to Table 2-3	N/A	N/A	N/A
Min. Lot Size	None*	1 acre	None	None
Min. Lot Width/Depth	None	100 feet/ 100 feet	None	None
Public Street/Perimeter Setbacks**	0 feet	Refer to Exhibit 2-28	Refer to Exhibit 2-28	Refer to Exhibit 2-28
Interior Side and Rear Setbacks**	0 feet	Refer to Exhibit 2-28	Refer to Exhibit 2-28	0 feet
Setback to Single-Family Housing Type	25 feet	200 feet	25 feet	10 feet
Max. Lot Coverage	90% (including hotels)^	None	None	15%
Building Separation	0 feet or per California Building Code	10 feet or per California Building Code	Per California Building Code	0 feet or per California Building Code
<ul style="list-style-type: none"> • * A site developed as a hotel/motel use shall have a minimum lot area of 20,000 square feet. • ** Interior setbacks apply to only legal lot lines, as designated on the Tentative Tract Map. Multiple lots that share the same parking and/or access shall be considered as one lot. • ^ A maximum of three (3) lots within the Mixed-Use zone may have 100% lot coverage. 				

Chapter 2 of the Specific Plan also establishes a circulation plan for the Specific Plan area, which is organized with a hierarchical street system creating a system of new collector and local streets. Each of the 21 street sections are established, in addition to the 4 private drive street sections. Chapter 2 also includes

standards regulating setback encroachments, parking standards, wall and fence standards, signage, and identity elements (e.g. gateways and towers).

Chapter 3 of the Specific Plan provides the design guidelines for the Specific Plan area, which provides a design framework for landscape, streets and buildings that convey a cohesive community identity. The Specific Plan creates three distinct levels of hierarchy called the Public Realm (i.e. public rights-of-way and community spaces), the Setback Realm (i.e. the private property between the public right-of-way and the required minimum setback, and the required minimum setback and the perimeter setback for the entire development), and the Private Realm (i.e. areas behind the building setback). The design guidelines establish the mandatory program amenities for the parks, the tree palette for the streetscape, the plant and tree palette for the landscape setbacks and landscape buffers, building form and relief (including massing and façade details), roof considerations, alley and service loading area treatments, sustainability design, and signage.

Chapter 4 of the Specific Plan discusses the infrastructure improvements needed to facilitate development of the Specific Plan area, including the installation of potable and recycled water lines, sanitary sewers, stormwater detention and conveyance system, electricity infrastructure, and natural gas lines. All dry utilities proposed shall be underground.

Chapter 5 of the Specific Plan establishes the methods and procedures for implementing and administering the Specific Plan. As provided therein, the Specific Plan will be implemented through Plot Plan Review, processed by the Planning and Building Director or his/her designee. The Plot Plan Review process, with few exceptions, is required prior to the issuance of any building permit. It is also required for all parks in the Specific Plan area. As part of the Plot Plan Review, the owner must submit an application which includes such information as: 1) a plot plan, drawn to scale, showing the layout of structures and other improvements (including driveways, walkways, parking areas, refuse areas, facilities for the handicapped, exterior lighting, etc.), 2) exterior elevations showing the architectural detail, 3) interior floor plans, 4) a landscape plan prepared by a licensed landscape architect, 5) a shared parking study (where applicable), 6) Design Guidelines consistency checklist to show how the application meets the applicable design guidelines, 7) Sustainability Checklist to show how the application meets applicable sustainable elements, 8) a security plan, 9) a utility plan, and 10) tabulation of the total building square footage, number of units and uses previously approved through the Plot Plan Review process.

Chapter 5 of the Specific Plan also establishes the requirements for certain permits, including sign permits, special use permits, and minor administrative permits. Also included is a discussion on the role of the Development Agreement and the maintenance responsibilities for infrastructure improvements.

The Appendix to the Specific Plan provides a glossary of terms used in the Specific Plan in addition to a consistency analysis of the Specific Plan to the City's General Plan.

Overall, the Specific Plan is designed to provide for the efficient use of underutilized land by creating a new infill, mixed-use development. The Specific Plan creates new zoning standards to govern the build-

out of the Specific Plan area to allow for different uses than would otherwise be permitted under current zoning. For example, the minimum setback requirements are applied on a site-wide basis, which allows for the construction of new, modern housing product types that may not be possible under traditional zoning, including single-family detached: alley-loaded, paseo cluster, motor court cluster and greencourt cluster, while reinforcing and protecting the character of public streets to create a pedestrian-friendly streetscene. The Specific Plan also provides different parking standards, including the use of shared parking and street parking, in an effort to avoid creating an excessive oversupply of parking at the expense of providing the community with generous parkland and open space. The new zoning standards provided in the Specific Plan also allow for the extensive planting of street trees, parkways and landscape setbacks to create an urban forest. The chart below presents the land use implications of the Specific Plan for the major land use planning categories.

Category	Current Zoning	Proposed Hollywood Park Specific Plan	Land Use Implications
Land use and zone designation	Commercial and Recreation (C-R)	Hollywood Park Specific Plan (HPSC)	The Casino would be renovated and reconfigured in its existing location on the Project Site. This site would retain the existing zoning of C-R, but the remainder of the site would no longer be consistent with the Inglewood Municipal Code. As such the a Zone Change and approval of the Specific Plan would be necessary to bring the remaining portions of the Site in conformance with the IMC.
Types and amounts of development/ Permitted Uses	Animal exhibits, animal competitions and shows, athletic events (professional and amateur), social events, entertainment events, banquets and dining events, conventions and conferences, exhibit (business, industrial and professional), movie sets and locations, live telecast, filming of commercials and documentaries, recreation and leisure events, vehicular competitive events within a fully enclosed building or structure, children’s activities, game and video arcades and comparable	Acupressure establishment, acupuncture or chiropractor establishment, antique store, art gallery, auditorium, bowling alley, carnival, child care center, civic use, community center, counseling/tutoring group, dwelling units, farmer’s market, financial institution, grocery store, gymnasium or health club, hotel, marketplace retail, movie theater, multi-tenant shopping center, music lounge, nightclub, professional office, playground, restaurant, café, delicatessen or bakery, retail sales, school, and others. See Table 2-4 of the Specific Plan for a	Many of the additional uses proposed as part of the Specific Plan are essential for a vibrant, mixed-use environment. For example, current zoning would not permit the development of residential dwelling units, retail or professional office spaces. These uses are at the core of creating a viable mixed-use community. The proposed mix of uses in the Specific Plan area are compatible with, and complementary to the existing uses in the communities surrounding the site. Additionally, by providing a mix of uses on the site, the Project would help increase the jobs/housing ratio in the region, which is currently jobs rich, and the mixed-use community supports regional planning goals of promoting “smart-growth” through mixed-use and infill development projects, in an effort to decrease VMT (vehicle miles traveled) in the region.

	family recreation centers, gaming clubs, and public parking.	complete list of allowable land uses in the Specific Plan area.	
Heights	<p>Residential</p> <ul style="list-style-type: none"> R-1: 35', 2.5 stories R-3: 40', 3 stories R-4: 75', 6 stories <p>Non-Residential</p> <ul style="list-style-type: none"> C-2: 75', 6 stories CC: Per Site Plan Review OS: 25', 2 stories C-R: 150' 	<p>Residential</p> <ul style="list-style-type: none"> SF Housing Type: 45', 3 stories TH Housing Type: 75', 5 stories WP Housing Type: 75', 5 stories <p>Non-Residential</p> <ul style="list-style-type: none"> Mixed-Use: 75', 5 stories (except for one area where the max. is 150', 14 stories for a hotel) and 1 signature architecture feature 85' above height limit (max 1,000 sq. ft) Civic: 75', 5 stories Open Space: 1 story C-R: 75', 5 stories Architectural features: 25' above height limit (625 sq. ft each) 	<p>The height requirements were modified to provide a cohesive and unified design for the entire Specific Plan area and to permit the development of a multi-story hotel. The Specific Plan contains three height zones, with the most restrictive zone adjacent to the one-family homes to the north and east of the Specific Plan area so as to preserve views. See Section 2.7 and Exhibit 2-29 of the Specific Plan.</p> <p>The height limits allow for a signature identity corner and tower architectural feature. As provided in Section 3.2.2 of the Specific Plan, the identity corner and tower will be the most prominent feature of the Specific Plan area and will urge passers-by to experience the retail and entertainment neighborhood of the development. A grand tower with identity signage may become an identifiable feature of the Inglewood skyline and may reinforce the significance of Hollywood Park.</p> <p>With the exception of the hotel site and the identity corner and tower, the remaining height districts, which cover more than 90% of the 238-acre site will have similar height restrictions as under current zoning.</p>
Setbacks	<p>Residential</p> <p>Front</p> <ul style="list-style-type: none"> R-1: 25% of lot depth, 25' max. R-3: 20% of lot depth, 20' max. R-4: 15' <p>Interior Side</p> <ul style="list-style-type: none"> R-1: 10% of lot width (3' min., 5' max.) R-3: 7' or 10' (depending on building height) R-4: 7' or 10' (depending on building height) <p>Street Side</p> <ul style="list-style-type: none"> Same as Interior Side <p>Rear</p>	<p>Residential</p> <p>Front</p> <ul style="list-style-type: none"> SF Housing Type: 10' (Per Exhibit 2-28) TH Housing Type: 10' to 15' (Per Exhibit 2-28) WP Housing Type: Varies, 0' to 30' (Per Exhibit 2-28) <p>Interior Side</p> <ul style="list-style-type: none"> SF Housing Type: 5' min. may be reduced to 0' through a shared use easement with 10' cumulative side yard setback/building separation TH Housing Type: 5' min. may be reduced to 0' through a shared use easement with 10' 	<p>The Specific Plan establishes a set of setback standards based on the design principles of the Project and are tied to creating pedestrian-scaled street frontages. One of the most significant design principles of the Project is creating a streetscape marked by pedestrian-oriented retail/commercial corridors created through strong relationships between building form, street and pedestrian paths, and architecturally interactive facades. As a result, the setback standards are tied to the character of public street frontages and adjacent land uses, instead of general zone designations. In some cases, the setback requirements would be supplemented with lot coverage restrictions, and where applicable, could result in deeper setbacks at [many] locations, in particular for the residential uses in the Residential Zone.</p> <p>The establishment of the setbacks tied to roadways</p>

	<ul style="list-style-type: none"> • R-1: 25% of lot depth, 25' max. • R-3: 20% of lot depth, 20' max. • R-4: 15' <p>Non-Residential Front</p> <ul style="list-style-type: none"> • C-2: 0' (except for street buffer) • CC: Per Site Plan Review • OS: Per Site Plan Review <p>Interior Side</p> <ul style="list-style-type: none"> • C-2: 0' • CC: Per Site Plan Review • OS: Per Site Plan Review <p>Street Side</p> <ul style="list-style-type: none"> • C-2: 0' (except for street buffer) • CC: Per Site Plan Review • OS: Per Site Plan Review <p>Rear</p> <ul style="list-style-type: none"> • C-2: 0' • CC: Per Site Plan Review • OS: Per Site Plan Review 	<p>cumulative side yard setback/building separation</p> <ul style="list-style-type: none"> • WP Housing Type: 0' (minimums maybe superseded by Exhibit 2-28) <p>Street Side</p> <ul style="list-style-type: none"> • Per Exhibit 2-28 <p>Rear</p> <ul style="list-style-type: none"> • SF Housing Type: 5' • TH Housing Type: 5' • WP Housing Type: 0' • All setbacks may be reduced to 0 through a shared use easement as long as the 10' cumulative side yard setback/building separation is maintained • (minimums unless superseded by Exhibit 2-28) <p>Non-Residential Front</p> <ul style="list-style-type: none"> • Mixed-Use: Varies 0' to 25' (Per Exhibit 2-28) • Civic: Varies 10' to 30' (Per Exhibit 2-28) • Open Space: 10' (Per Exhibit 2-28) <p>Interior Side</p> <ul style="list-style-type: none"> • Mixed-Use: 0' • Civic: 10' per Exhibit 2-28 • Open Space: 0' (or 10'-15' per Exhibit 2-28) <p>Street Side</p> <ul style="list-style-type: none"> • Mixed-Use: Varies 0' to 25' (Per Exhibit 2-28) • Civic: Varies, 10' to 30' (Per Exhibit 2-28) • Open Space: 10' (Per Exhibit 2-28) <p>Rear</p> <ul style="list-style-type: none"> • Mixed-Use: 0' • Civic: 0' (or 10' per Exhibit 2-28) • Open Space: 0' (or 10'- 	<p>and adjacent uses is an alternative planning approach with advantages over the standards based on broad zone categories. This approach better addresses the mixed-use concept of development, which contains varied building orientations and varied uses. Setbacks established by the Specific Plan apply across the entire development, not just the residential uses. Establishing setbacks using this planning approach supports the continuity of design between retail, commercial, residential, civic, casino/gaming, and hotel uses, and addresses compatibility between these uses. This approach also allows for the construction of new, modern housing product types that may not be possible under traditional zoning, including single-family detached: alley-loaded, paseo cluster, motor court cluster and greencourt cluster, while reinforcing and protecting the character of public streets to create a pedestrian-friendly streetscene. Additionally, the new setback standards allow for the extensive planting of street trees, parkways and landscape setbacks to create an urban forest.</p> <p>In some cases, a residential use at a particular location with a particular street orientation could be built consistent with the Specific Plan standards and have setbacks that would be less than those typically included in R-1, R-3 or R-4 zoning per the IMC. Overall however, resulting setbacks would also be greater at locations throughout the Specific Plan area due to the following: (1) the setbacks would apply to retail/commercial as well as residential uses; and (2) the lot coverage restrictions would sometimes result in more space around buildings than could occur under the typical standards.</p> <p>For these reasons the proposed setbacks are considered to be compatible with the existing, applicable zoning.</p>
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<p>Residential Density</p>	<ul style="list-style-type: none"> R-1 Zone (SF Housing Type): 7.26 du/ac R-3 Zone (TH Housing Type): 39.6 du/ac R-4 Zone (WP Housing Type): 54.45 du/ac 	<p>15' per Exhibit 2-28)</p> <ul style="list-style-type: none"> SF Housing Type: 15.0 du/ac TH Housing Type: 30.0 du/ac WP Housing Type: 85.0 du/ac 	<p>Residential density in the Specific Plan area will be controlled by the limitation on the number of dwelling units that could be developed (i.e. 2,995 or 3,500 if the Equivalency Table is used). As a land use planning approach, housing in the Specific Plan area is proposed to be concentrated rather than being dispersed as in a conventional development. This approach has several advantages. For example, the housing densities in the land use plan in the Specific Plan maximize usable public open-space by aggregating small, private open space; this allows for the creation of 25-acres of highly-amenitized park and open space areas in the Specific Plan whose maintenance costs and responsibilities will be borne by the Home Owners Association of the Specific Plan area. Additionally, the residential densities in the Specific Plan help create a compact, walkable community, and they allow for the creation of a variety of residential product types which will provide opportunities for ownership housing for a diverse range of buyers at various income levels including first time home-buyers, move-up buyers and empty-nesters.</p>
<p>Parking (Residential)</p>	<p><u>Required Resident Spaces</u></p> <ul style="list-style-type: none"> 2 fully enclosed per unit <p><u>Required Guest Spaces (For 3,500-square foot single-family Homes)</u></p> <ul style="list-style-type: none"> No Requirement <p><u>Required Guest Spaces (For other Housing Types)</u></p> <ul style="list-style-type: none"> .33 guest spaces per unit <p><u>Senior Citizen Dwelling</u></p> <ul style="list-style-type: none"> 1.5 spaces per unit <p><u>Required Shopkeeper Spaces</u></p> <ul style="list-style-type: none"> 2 enclosed resident spaces + .33 guest spaces + retail sq. ft. <p><u>Required Live/Work Spaces</u></p> <ul style="list-style-type: none"> 2 enclosed resident spaces + .33 guest spaces + retail sq. ft. 	<p><u>Required Resident Spaces</u></p> <ul style="list-style-type: none"> SF Housing Type: 2 spaces (2 within garage) TH & W/P Housing Types: Studio and one-bedroom units: 1.5 spaces (1 within garage); 2+ bedroom units: 2 spaces (1 within garage) <p><u>Required Guest Spaces (For 3,500-square foot single-family Homes)</u></p> <ul style="list-style-type: none"> 1 guest space per unit and up to 50% may be provided on-street <p><u>Required Guest Spaces (For other Housing Types)</u></p> <ul style="list-style-type: none"> .33 guest spaces per unit and up to 50% may be provided on-street <p><u>Senior Citizen Dwelling</u></p> <ul style="list-style-type: none"> 1.5 spaces per unit (1 covered) 	<p>The Specific Plan provides different parking standards, including the use of shared parking and street parking, in an effort to avoid creating an excessive oversupply of parking at the expense of providing the community with generous parkland and open space. The parking standards provided in the Specific Plan help to promote a livable, pedestrian-friendly community by avoiding expansive parking lots and unused parking spaces. Standards regulating landscape requirements for parking lots and structures were added to increase the attractiveness of the parking lot and to reduce the heat island effect. Additionally, tandem parking is permitted in the Mixed-Use Zone only if it has valet service.</p> <p>With respect to residential parking, unlike the IMC, the number of spaces to be built will be dependent upon the bedroom counts of the dwelling units developed. These standards allow parking to be right-sized—to take into account less demand for studio and 1-bedroom dwellings, while still providing sufficient parking to meet the demand within the development.</p>

	<p><u>Location of Residential Parking</u></p> <ul style="list-style-type: none"> • 200' from entrance to dwelling unit and on same site. • Guest parking restricted within front setback. <p><u>Tandem Parking</u></p> <ul style="list-style-type: none"> • Not permitted to count toward required parking <p><u>Parking Stall/Garage Sizes</u></p> <ul style="list-style-type: none"> • Standard Parallel Stall: No Standard 	<p><u>Required Shopkeeper Spaces</u></p> <ul style="list-style-type: none"> • 2 resident spaces (1 within garage) and 1.5 for guest spaces per unit <p><u>Required Live/Work Spaces</u></p> <ul style="list-style-type: none"> • 2 resident spaces (1 within garage) and .5 for guest spaces per unit <p><u>Location of Residential Parking</u></p> <ul style="list-style-type: none"> • All Housing Types: 400' from parking to entrance of unit or lobby • Except MU Housing Type: 600' from parking to entrance of unit or lobby • Guest parking may be located on another parcel • May not be located within front or street side setback <p><u>Tandem Parking</u></p> <ul style="list-style-type: none"> • All required resident parking spaces may be in tandem (no more than two cars in depth) <p><u>Parking Stall/Garage Sizes</u></p> <ul style="list-style-type: none"> • Standard Parallel Stall: 8'x22' • 	<p>Please see Responses 6.1, 6.2, and 6.3 for further details on the parking standards required in the Specific Plan area.</p>
<p>Parking (Non-residential)</p>	<p><u>Required Spaces</u></p> <ul style="list-style-type: none"> • Depends on use: Ranges from 1/35 sq. ft. to 1/400 sq. ft. <p><u>Location of Parking</u></p> <ul style="list-style-type: none"> • Parking shall be located on the same lot <p><u>Landscaping</u></p> <ul style="list-style-type: none"> • No codified standards <p><u>Tandem Parking</u></p> <ul style="list-style-type: none"> • Not permitted to count toward 	<p><u>Required Spaces</u></p> <ul style="list-style-type: none"> • Per Shared Parking Analysis. • Final number will depend on the final mix of uses at Plot Plan submittal <p><u>Location of Parking</u></p> <ul style="list-style-type: none"> • Parking may be located on-street, another lot and may be shared with other uses and within 1200 feet to the entrance of any use. 	<p>See comments above.</p>

	<p>required parking</p> <p>Parking Stall Sizes</p> <ul style="list-style-type: none"> Standard Parallel Stall: No codified standard <p>TDM Requirements</p> <ul style="list-style-type: none"> Provide an information kiosk/board about public transportation & rideshare; Provide an employee parking area (30% of total retail/commercial spaces and 85% of total office spaces); 10% of the employee parking area shall be reserved for carpool/vanpool parking spaces; Safe and convenient access from the employee parking area and the employee entrance; Bike racks, lockers or other form of bike parking at a ratio of 3 bike spaces plus 1 additional space per 50,000 sq. ft. of non-residential building area. 	<p>Landscaping</p> <ul style="list-style-type: none"> One 15-gallon tree is required per 10 surface parking spaces and there shall be a 5' minimum landscape buffer between the parking lot and a public right-of-way <p>Tandem Parking</p> <ul style="list-style-type: none"> All commercial parking spaces may be in tandem when attendants are parking vehicles <p>Parking Stall Sizes</p> <ul style="list-style-type: none"> Standard Parallel Stall: 8'x22' <p>TDM Requirements</p> <ul style="list-style-type: none"> A kiosk or bulletin board providing information about ride sharing and public transportation; Bicycle racks at a ratio of 1 bicycle space for every 50,000 square feet of non-residential development plus an additional 3 bicycle spaces (developments under 50,000 square feet are exempt from this requirement); Employee parking area and safe and convenient access from the employee parking area to all businesses; Bus shelter improvements along Century Boulevard and Prairie Avenue adjacent to the project; Preferential parking spaces for vanpools; Sidewalks or other designated pathways following safe routes from the pedestrian circulation along Century Boulevard and Prairie Avenue to the bicycle parking facilities and into the 	
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		<p>development; and</p> <ul style="list-style-type: none"> • Transportation/Parking Benefit Account (similar to flexible spending accounts) used by on-site employers to provide their employees the opportunity to benefit from tax advantages under the Internal Revenue Code for qualified parking, vanpooling and purchasing of transit passes. 	
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COMMENT 9.69

It should be noted that the Goals and Policies of the Housing Element are not included within this Section. Although the City has an adopted 2000-2005 Housing Element, the 2008-2014 Housing Element was due to be reviewed by the State Department of Housing and Community Development on June 2008 and the 2006-2014 RHNA allocations have been released. A discussion of the 2008-2014 Housing Element and the project’s relationship to the 2006-2014 RHNA period should be discussed.

RESPONSE 9.69

Section IV.I, Land Use Planning, of the Draft EIR includes multiple references to Section IV.H, Population, Housing & Employment which includes a detailed analysis of the Proposed Project’s potential impacts related to housing and overall project consistency with the City Housing Element beginning on page IV.H-19. Accordingly, although Section IV.I, Land Use Planning, does include direct analysis of this issue, it is incorporated by reference to another section in the Draft EIR, which adequately analyzed the issue. No further response is required.

COMMENT 9.70

A discussion of the goals and objectives and policies of the Manchester-Prairie Redevelopment Plan and a consistency analysis have not been included.

RESPONSE 9.70

Page IV.I-13 of the Draft EIR states: The City of Inglewood has adopted six redevelopment projects over a 23-year period. On July 16, 1996 the City Council merged the six redevelopment projects (“Merged Inglewood Redevelopment Project” or (“Merged Project Area” each individual area, a “Constituent Redevelopment Project Area”), and amended and restated the existing redevelopment plans by adopting one redevelopment plan applicable to all six merged redevelopment projects known as the “Amended and

Restated Redevelopment Plan for the Merged In Town, La Cienega, Manchester-Prairie, North Inglewood Industrial Park, Century, and Imperial-Prairie Redevelopment Projects” (the “Merged Redevelopment Project”). The Merged Project’s basic objectives are to eradicate the blighting influences within the Redevelopment Project Area, redevelop incompatible land uses and revitalize existing development to obtain and be consistent with the environmental, social, and economic goals of the community. The Draft EIR continues to state that the Project Site is located within portions of the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area. A discussion of the Constituent Redevelopment Project Areas is subsequently provided in the Draft EIR. Furthermore, beginning on page IV.I-29, the Draft EIR provides a consistency analysis with the Merged Redeveloped Project Area, which includes the Manchester-Prairie Redevelopment Plan.

On September 11, 2007, the Agency adopted the current combined Implementation Plan (the “Implementation Plan”) for the Merged Project Area, covering the five-year period beginning in FY 2006/07 and ending in 2010/011. The Implementation Plan was adopted pursuant to Section 33352(c) of the Community Redevelopment Law (CA Health and Safety Code). The chart below contains a discussion of the goals in the Implementation Plan for the Century and Manchester-Prairie constituent redevelopment project areas and the Project’s consistency with those goals.

Century Constituent Project Area	
Goal	Consistency Analysis
Increase employment opportunities for a diversified workforce.	The Project is consistent with this goal in that implementation of the Project would generate 17,105 construction-related jobs over the buildout and stabilization horizon of the Project. As discussed on Page IV. H-12, this estimate includes 9,203 direct jobs, 3,274 indirect jobs, and 4,628 induced jobs. During the operational phase of the Project, the land uses would generate 3,135 jobs (or 517 net new jobs). These jobs are generated by the office/commercial, retail, hotel, residential and casino/gaming uses proposed for the site.
Provide development assistance to commercial and industrial markets to better serve Project Area residents and patrons.	The Redevelopment Agency is providing assistance through coordinating the necessary General Plan and Redevelopment Plan amendments, and other required entitlements. In addition, there has been discussion of Agency assistance in funding affordable housing and possibly infrastructure improvements. However, at this time the Project does not assume financial assistance.

	Nonetheless, the Project is consistent with this goal.
Promote new continuing private sector investment within the Project Area to prevent the loss of and to facilitate the capture of commercial and industrial activities.	The Project proposes retail and commercial/office uses and is consistent with this goal because it will result in indirect investment from the purchase of goods and services to support activities within the Project site.
Manchester-Prairie Constituent Project Area	
Encourage commercial revitalization activities by providing low interest commercial loans to area businesses.	This goal will not be addressed directly by the proposed Project but the increase in residential units and influx of new commercial development will act as a catalyst for additional investment and revitalization of adjacent commercial properties.
Facilitate business expansion and economic development by providing assistance to and working with potential developers.	As previously stated, the Redevelopment Agency is providing assistance through coordinating the necessary General Plan and Redevelopment Plan amendments, and other required entitlements. In addition, there has been discussion of Agency assistance in funding affordable housing and possibly infrastructure improvements. However, at this time the Project does not assume financial assistance. The Project is nonetheless consistent with this goal.
Foster business recruitment and enhancement activities to attract new commercial uses to the Project Areas.	The Project proposes 620,000 sf of retail uses and 75,000 sf of commercial/office uses. As a result, the Project would be consistent with this goal because these uses require that business recruitment will be part of the implementing process to attract the desired mix of retailers to the commercial and mixed-use component of the Project.
Attract the development of neighborhood-serving retail uses.	The Hollywood Park Specific Plan, was prepared and refined to incorporate feedback from community meetings. One of the key themes included the creation of an outdoor retail lifestyle center with fine dining, movie theaters, and shops with name brand tenants. Thus, the Project is consistent with this goal.

COMMENT 9.71

Impact discussion on dividing an existing community has been included. However, the compatibility of land uses, specifically, locating a Casino to adjacent residential uses and the mixed-use residential interface of uses within the project is too brief. A greater discussion of noise, lighting, traffic, landscaping, and aesthetics impacts of the proposed project should be included in the Land Use discussion, and if it is addressed in other sections, it should be identified and referenced clearly.

RESPONSE 9.71

Page IV.I-20 of the Draft EIR provides a thorough discussion of the land use compatibility and the potential divide an existing community. Furthermore, the detailed analyses of the project's consistency with all of the applicable regional and local plans included in the Draft EIR further illustrates land use compatibility at the local and regional level. In addition, in an effort to reduce redundancies in the Draft EIR, Section IV.I, Land Use Planning provides multiple references to other sections of the document where certain issues have been analyzed in great deal, such as air quality, noise, and traffic, among others. This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require any further response.

With regard to the compatibility between the Casino land use and the adjacent residential land uses, please refer to Response 9.75.

COMMENT 9.72

All the Land Use Element policies are not listed in the section. There are included in a separate document. However, not all goals are listed in this document. Specifically, relevant Goals listed under B. Residential, C. Commercial, E. Circulation and F. Community Facilities are not listed (pages 6 to 8 of the City of Inglewood Land Use Element).

RESPONSE 9.72

The residential and commercial goals within the Land Use Element are listed beginning on page IV.I-8 of the Draft EIR. However, the comment correctly states that the circulation and community facilities goals are not listed in this section. This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended accordingly. Specifically, the following will be added to page IV.I-10 of the Final EIR:

The goals and objectives for circulation as identified in the Land Use Element are as follows:

- Insure that proposed new uses can be accommodated by adequate and safe streets;
- Promote and support adequate public transportation within the City and the region;

- Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets; and
- Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.

The goals and objectives for community facilities as identified in the Land Use Element are as follows:

- Pursue the continued acquisition and development of parks and recreation facilities to the extent feasible within the City’s budgetary capability;
- Maintain the present high level of police and fire services to the extent it is fiscally prudent;
- Encourage the retention of high quality library services; and
- Expand opportunities for cultural and social growth for the City’s residents.

In addition, a table insert will be added to page IV.I-29 of the Final EIR which illustrates the Proposed Project’s consistency with the goals and policies of the Land Use Element. Please see the Additions and Corrections Section of this Final EIR for the table.

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

Goals and Objectives	Consistency of the Proposed Project
<i>General Goals and Objectives</i>	
Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted.	The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property. As such, it is a redevelopment project that would maximize the use of land on site and would thus be consistent with this goal. The Proposed Project is a mixed-use community that will place housing opportunities in close proximity to transit and jobs, and create open space, retail, entertainment, casino/gaming and civic opportunities.
Help promote sound economic development and increase employment opportunities for the City’s residents by responding to changing economic conditions.	The Proposed Project is a mixed-use community that will increase employment opportunities by providing 3,135 jobs, which is 517 more jobs than currently exist on the Project Site.

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Maximize the use and conservation of existing housing stock and neighborhoods and also facilitate development of new housing to meet community needs.</p>	<p>The Proposed Project would support implementation of this policy by including 2,995 new residential units. The Project Site is adjacent to residential uses. Therefore, it will preserve and expand the neighborhood feeling, which will help to conserve the housing stock in the project vicinity.</p>
<p>Develop a land use element that facilitates the efficient use of land for conservation, development and redevelopment.</p>	<p>The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As such, it is a redevelopment project that would maximize the use of the Project Site by creating a mixed-use development on what could be considered a currently under-utilized property in the City. The Proposed Project would thus be consistent with this goal.</p>
<p>Promote Inglewood’s image and identity as an independent community within the Los Angeles Metropolitan area.</p>	<p>The Proposed Project would contribute to the revitalization of the City of Inglewood by providing an example of “smart-growth” infill development consisting of mixed-use retail, office, hotel, residential development, and integrated open space. It would further enhance the visual appearance and appeal of the City which would help to project a positive image and independent identity. Thus, the Proposed Project would be consistent with this objective.</p>
<p><i>Commercial Land Use Designation</i></p>	
<p>Create and maintain a healthy economic condition within the present business community and assist new businesses to relocate within the City.</p>	<p>The Proposed Project would be consistent with this objective by creating a mixed-use development with 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, and a 300-room hotel including 20,000 sf of related meeting space.</p>
<p>Protect local businessmen and encourage the importance of maintaining a strong commercial district in the downtown.</p>	<p>The Proposed Project would be consistent with this objective by creating a mixed-use development with 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, and a 300-room hotel including 20,000 sf of related meeting space which could be utilized to by locals to further enhance and stimulate their local businesses. In addition, the Proposed Project would result in 517 more jobs than currently exist on the Project Site which would help strengthen the commercial community.</p>

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Improve the visual appearance and economic condition of the existing arterial commercial development along Inglewood’s major streets.</p>	<p>The Proposed Project would stimulate the existing visual character within the City of Inglewood by revitalizing the area with new and infill development, and would thus be consistent with this goal.</p>
<p>Encourage the continued development and promotion of existing commercial centers such as Crenshaw-Imperial and Morningside Park.</p>	<p>The Project Site is located within portions of the Century Constituent Redevelopment Project Area and the Manchester-Prairie Constituent Redevelopment Project Area, which are part of the Merged Redevelopment Project Area. As discussed in the Draft EIR, the Project will be subject to these redevelopment plans and the Proposed Project would be consistent with the goals and objectives of those plans.</p>
<p>Continue to promote the development of high quality commercial office space at appropriate locations within the City through the redevelopment process.</p>	<p>The Proposed Project is a mixed-use redevelopment project that includes 75,000 sf of office/commercial space, and would therefore be consistent with this objective.</p>
<p>Promote the development of commercial/recreational uses which will complement those which already are located in Inglewood.</p>	<p>The Proposed Project is a mixed-use development project that integrates commercial, residential, civic and recreational open space areas, and would be consistent with this objective.</p>
<p><i>Residential Land Use Designation</i></p>	

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Encourage neighborhood stability and conservation by reducing the amount of land designated for high density development.</p>	<p>The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. The Proposed Project consists of a mixed-use development, which includes a variety of types of parks and open space areas. For security reasons, some individual areas may be gated off (for example, a tot-lot, swimming pool or homeowners club house). Certain recreation facilities, such as the private swimming pool and restroom facilities located in Bluff Park will be open to Hollywood Park residents or facility members only. Other parks and open spaces will be maintained by the various home owners associations and generally open for public use during daytime hours only. After daylight hours parks and open spaces will only be open to Hollywood Park residents. The Proposed Project would fulfill the park and recreational needs of its residents by providing 25 acres of open space on the Project Site. This added open space would help alleviate the City’s existing substandard provision of parkland and recreational facilities. The Proposed Project would provide more than enough open space to meet the parks and recreation needs of the planned development, and would help to reduce the density of the development while also integrating the Project Site with surrounding residential uses.</p>
<p>Promote the maintenance, rehabilitation, and modernization of the City’s housing stock.</p>	<p>The Proposed Project would result in redevelopment of the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood, and would include 2,995 dwelling units. Further, the Project would eliminate and prevent the spread of blight and deterioration by providing housing ownership opportunities near retail uses, restaurant uses, and public open space within portions of the Merged Redevelopment Project Area.</p>

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Encourage the preservation of Inglewood’s fair share of housing for low and moderate income persons.</p>	<p>The Proposed Project would support implementation of this policy by including 2,995 new residential units. The Proposed Project would provide a range of for sale and rental products within a variety of product types (i.e., single-family attached and detached units, stand alone multi-family developments and mixed-use multi-family developments) which would target persons of all income levels. For a detailed discussion of contributions to affordable housing through tax increment financing and the 20% set-aside see Section IV.G, Population, Housing & Employment of the Draft EIR.</p>
<p>Safeguard the City’s residential areas from the encroachment of incompatible uses.</p>	<p>The Proposed Project is a mixed-use development project that integrates residential, commercial, civic and recreational open space areas, and is carefully planned in a way that would be cohesive with the adjacent residential neighborhood. The Conceptual Circulation Plan provides a safe and efficient network of roadways, providing for pedestrian trail systems and bicycle circulation in conjunction with the street network. A hierarchy of bicycle connections is incorporated throughout the development to encourage the use of walking, jogging and bicycling. The Conceptual Circulation Plan would provide connections to the existing City of Inglewood Street network and convenient access to individual residential neighborhoods, employment, and the mixed-use core. Therefore, the Project would be consistent with this objective.</p>
<p>Foster the revitalization or, if necessary, the recycling of residential areas which cannot provide a decent living environment because of jet noise impact.</p>	<p>The Proposed Project will provide new housing in a designated Airport Land Use Plan area. The Proposed Project has been designed in a manner that is consistent with the Airport Land Use Plan Land Use Compatibility Chart. All residences, including any proposed residential uses that fall within the Airport Influence Area’s 65 dBA CNEL contour, would be developed in a manner that achieves a 45 dBA interior noise level.</p>
<p>Encourage suitable condominium development as a means of diversifying types of housing and increasing the number of residents who own property.</p>	<p>The Proposed Project would provide a range of for sale and rental products within a variety of product types (i.e., single-family attached and detached units, stand alone multi-family developments and mixed-use multi-family developments).</p>

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Promote residential developments which will attract middle and upper income families who can afford the higher cost of recycled development.</p>	<p>The Proposed Project would provide a range of for sale and rental products within a variety of product types (i.e., single-family attached and detached units, stand alone multi-family developments and mixed-use multi-family developments). As such, the Project would provide a range of housing to meet all income levels, including middle and upper income families.</p>
<p><i>Circulation</i></p>	
<p>Insure that proposed new uses can be accommodated by adequate and safe streets.</p>	<p>A traffic impact analysis has been prepared to ensure that the existing street system can accommodate the Proposed Project. The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. The Project Site would contain a network of streets and paseos that connect the parks and plazas with retail, entertainment, residential, office and civic uses. Project design features and Mitigation Measures have been designed to ensure that the Project would be consistent with this objective (see Section IV.L, Traffic/Transportation of the Draft EIR).</p>
<p>Promote and support adequate public transportation within the City and the region.</p>	<p>The Proposed Project includes a mixed-use commercial and residential development in an area currently served by mass transportation services and facilities. Therefore, the Project would increase the development density at a strategic point for public transportation and would be consistent with this objective.</p>
<p>Develop modified traffic systems that will discourage through traffic from utilizing neighborhood streets.</p>	<p>The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. The Project Site would contain a network of streets and paseos that connect the parks and plazas with retail, entertainment, residential, office and civic uses.</p>

**Table IV.I-2.C
Consistency of the Proposed Project with the General Plan Land Use Element**

<p>Develop a safe and adequate pedestrian circulation system which is barrier free for the handicapped.</p>	<p>The Proposed Project is a mixed-use community that will create open space, retail, entertainment, casino/gaming and civic opportunities for residents to walk and bike. All federal, state, and local requirements for handicap-accessibility will be met.</p>
<p><i>Community Facilities</i></p>	
<p>Pursue the continued acquisition and development of parks and recreation facilities to the extent feasible within the City's budgetary capability.</p>	<p>The Proposed Project would fulfill the park and recreational needs of its residents by providing 25 acres of open space on the Project Site. This added open space would help alleviate the City's existing substandard provision of parkland and recreational facilities. Therefore, the Proposed Project would be consistent with this objective.</p>
<p>Maintain the present high level of police and fire services to the extent it is fiscally prudent.</p>	<p>The Project includes an on-site police substation in the mixed-use area of the Project Site. Furthermore, the Proposed Project would not be expected to impact fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LACoFD. Therefore, the Proposed Project would be consistent with this policy.</p>
<p>Encourage the retention of high quality library services.</p>	<p>The City's libraries believe that their current facilities can provide the same level of service to the additional population in the Project area. Development of the Project Site would result in additional tax revenue in the City of Inglewood that could be used to expand the existing computer workstations at the Inglewood Public Library. In addition, the Proposed Project includes a 4-acre site be dedicated for civic uses that the City could develop with a library, joint use school/library, or other public use to offset the increased demands upon the library services.</p>
<p>Expand opportunities for cultural and social growth for the City's residents.</p>	<p>The Proposed Project includes a 4-acre site be dedicated for civic uses that the City could develop as a school or library, which could be a source to foster cultural and social growth for the City.</p>
<p><i>Source: City of Inglewood General Plan: Land Use Element, January, 1980. Consistency analysis provided by Christopher A. Joseph & Associates.</i></p>	

COMMENT 9.73

Only four SCAG Compass Visioning Principles have been included. The EIR should include all SCAG Compass Visioning Principles. The existing consistency discussion of the proposed project and the Visioning Principles is too conclusory and does not provide substantial evidence to support the conclusion.

RESPONSE 9.73

Table IV.I-1 in the Draft EIR provides a detailed project consistency analysis with regard to all of the applicable and relevant policies of the Regional Comprehensive Plan and Guide. Furthermore, page IV.I-24 of the Draft EIR provides an adequate discussion of the project’s consistency with SCAG’s Growth Visioning Goals. As stated in the SCAG Compass Visioning Principals, there are four main principles are intended to promote and maximize regional mobility, livability, prosperity and sustainability. The main principals and the Project’s consistency with these principals has been presented in the Draft EIR at Page IV. I-24. In response to the comment, a supplemental analysis of the Compass Vision Principals is presented in Table IV.I-2.B below to provide more detail regarding how the Project meets the strategies of each of the four main principals.

**Table IV.I-2.B
SCAG COMPASS GROWTH VISION PRINCIPALS**

Principals and Strategies	Consistency of the Proposed Project
<i>Principal 1: Improve mobility for all residents</i>	
Encourage transportation investments and land use decisions that are mutually supportive.	<p>The Project proposes to increase vehicular capacity on Century Boulevard by widening the north side of Century Boulevard along the entire Hollywood Park project frontage to accommodate an additional travel lane. In addition, the project proposes to increase vehicular capacity on Prairie Avenue at the Arbor Vitae Street, Hardy Street, and 97th Street intersections by widening the east side of Prairie Avenue to provide exclusive right-turn only lanes at these intersections. Also, the traffic signal equipment at all the signalized intersections along the Hollywood Park's Prairie Avenue and Century Boulevard frontages will be modified accordingly. In addition, two new traffic signals are proposed to be installed: one on Century Boulevard and one on Prairie Avenue. All of these physical improvement measures, as described on Pages IV.L-73-75 of the DEIR, were analyzed in the traffic impact study as project design features and construction of these improvement measures will be the sole responsibility of the project.</p> <p>As a new mixed-use development that integrates housing, civic, entertainment and retail amenities (jobs, parks, shopping opportunities, etc.), the Project will help reduce vehicle miles traveled resulting from discretionary automobile trips. Additionally, a mix of land uses will also contribute to the overall reduction in vehicle miles traveled by promoting alternative methods of transportation and creating provisions for non-vehicular travel (e.g. pedestrian pathways and paseos, bike paths, etc.) within the Project Site.</p> <p>The Project is consistent with this strategy.</p>

<p>Locate new housing near existing jobs and new jobs near existing housing.</p>	<p>As discussed on Page IV. H-21 of the Draft EIR, the jobs-housing ratio for the entire South Bay region is projected to increase from 1.48 in 2000 to 1.59 in 2030. Thus, on a regional basis, the region can support more housing given the level of jobs in the region. The Final 2007 RHNA indicates that the SBCCOG region needs to provide 13,733 housing units during the January 1, 2006 to June 30, 2014 planning period. The creation of housing by the Proposed Project is consistent with the goals of the broader region to locate housing in close proximity to jobs. Thus, the project is consistent with this strategy.</p>
<p>Encourage transit-oriented development.</p>	<p>As discussed in Table IV. I-1 of the Draft EIR, the Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. The Project Site is located near well served public transit routes, including bus lines along Century Boulevard, Prairie Avenue and Crenshaw Boulevard, in addition to Metro Green Line stations at the Hawthorne Station and Crenshaw Station. In this way, the project is consistent with this strategy.</p>
<p>Promote a variety of travel choices.</p>	<p>The Proposed Project is a mixed-use community that will reduce the number of auto trips and vehicle miles traveled by placing housing opportunities in close proximity to transit and jobs. The Project will also create open space, retail, entertainment, casino/gaming and civic opportunities for residents to walk and bike. The Conceptual Circulation Plan also includes bike paths throughout the development. The internal circulation plan for the Project Site would be designed as a curvilinear street system connecting the community to the major streets, while providing for a safe residential, pedestrian-friendly environment by discouraging cut-through traffic. Overall, the goal of the Hollywood Park Specific Plan is to create a safe, walkable, pedestrian oriented village, with extraordinary open space, parkway, and recreational amenities. Therefore, the Project is consistent with this strategy.</p>
<p>Principal 2: Foster livability in all communities</p>	
<p>Promote infill development and redevelopment to revitalize existing communities.</p>	<p>The Proposed Project would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As an infill redevelopment, the Proposed Project would reduce costs by using and improving existing utility and roadway infrastructure.</p> <p>As discussed in further detail in Section IV.H, Population, Housing & Employment, horseracing in California is a declining business industry largely due to increased competition for the public's recreation and entertainment dollars. The increases in Indian gaming in California and the increases in purses in other states have called into question the long-term economic viability of horse racing in California. As such, the redevelopment of the Project Site would create a new, revitalizing use on an infill development site, and promote the Merged Redevelopment Plan's goal to revitalize existing development in a manner that is consistent with the environmental, social and economic goals of the City. Thus, the project is consistent with this strategy.</p>

<p>Promote developments that provide a mix of uses.</p>	<p>The Proposed Hollywood Park Redevelopment Project consists of the redevelopment of the approximately 238-acre Project Site, including the Racetrack Grandstand and the Pavilion/Casino and the construction of a new mixed-use development. The Proposed Project includes demolition of most of the improvements and structures on the Project Site, including the Hollywood Park Racetrack and grandstand, and the new construction of approximately 2,995 dwelling units (du), 620,000 square feet (sf) of retail space, 75,000 sf of office/commercial space, a 300-room hotel including 20,000 sf of related meeting space, and 10,000 sf of community serving uses for the Home Owners' Association (HOA). The Pavilion/Casino will be renovated at its existing location on the Project Site and reconfigured as a maximum 120,000 sf Casino/gambling facility. As part of the Development Agreement, a four-acre site is proposed to be made available to a public entity for civic uses, which could be a combination of one or more uses such as a school, library, community center, etc., subject to economic feasibility with respect to construction and operation costs for the respective entity. Approximately 25 acres will be designated for recreation/open space for the development, including 2.5 acres to be developed as an HOA Recreational Facility. Given this, the project is consistent with this strategy.</p>
<p>Promote "people-scaled," pedestrian-friendly communities.</p>	<p>The Specific Plan establishes a set of development standards and design guidelines based on the design principles of the Project and are tied to creating pedestrian-scaled street frontages. One of the most significant design principles of the Project is creating a streetscene marked by pedestrian-oriented retail/commercial corridors created through strong relationships between building form, street and pedestrian paths, and architecturally interactive facades.</p> <p>The Proposed Project is a mixed-use development project that integrates residential, commercial, civic and recreational open space areas, and is carefully planned in a way that would be cohesive with the adjacent residential neighborhood. The Conceptual Circulation Plan provides a safe and efficient network of roadways, providing for pedestrian trail systems and bicycle circulation in conjunction with the street network. A hierarchy of bicycle connections is incorporated throughout the development to encourage the use of walking, jogging and bicycling. The Conceptual Circulation Plan would provide connections to the existing City of Inglewood Street network and convenient access to individual residential neighborhoods, employment, and the mixed-use core. Therefore, the project is consistent with this strategy.</p>
<p>Support the preservation of stable, single-family neighborhoods.</p>	<p>Careful consideration has been given to the land use plan implemented through the Hollywood Park Specific Plan to create a community that is compatible with the uses surrounding it. Since there are existing single family houses to the north and east of the Specific Plan area, the housing types permitted in the neighboring Specific Plan area are of a compatible density and Bluff Park provides an open space buffer between the existing single-family dwellings and the Hollywood Park residential community. The retail/entertainment area of the Specific Plan community is located near the major roadways of Century Boulevard and Prairie Avenue and is compatible with the commercial uses nearby. The Hollywood Park development provides a land use plan where the more sensitive land uses (Single-Family Housing Type) are located away from adjacent major arterials roads and the less sensitive uses (commercial and office) are located near these roads. Thus, the project is consistent with this strategy.</p>

Principal 3: Enable prosperity for all people	
Provide a variety of housing types in each community to meet the housing needs of all income levels.	The Proposed Project will provide a variety of housing types throughout the Project Site. Per the Specific Plan, the Proposed Project will contain: Mixed Use Residential Housing, Single-Family Housing, Townhome Housing, and Wrap/Podium Housing. The Mixed-Use housing type typically includes condos/flats, live/work and shopkeeper units, wrap and podium buildings with residential over retail. The Single-Family housing type typically includes small lot, single family detached units, motor or green court cluster units. The Townhome housing type typically includes brownstones, townhouses and triplexes. The Wrap/Podium housing type typically includes condominium and flat units in wrap or podium buildings. The Proposed Project will provide ownership-housing opportunities of different pricing for all income levels. Thus, the project is consistent with this strategy.
Support educational opportunities that promote balanced growth.	The Proposed Project will provide for the provision of a four-acre Civic site that can be used for an elementary school with joint uses or other civic/education uses. Because of this, the Project is consistent with this strategy.
Ensure environmental justice regardless of race, ethnicity or income class.	The employment and retail opportunities provided by the Proposed Project would be available to all segments of the community, irrespective of race, ethnicity, or income class. Therefore, the Project is consistent with this strategy.
Support local and state fiscal policies that encourage balanced growth.	The Proposed Project will encourage balanced growth by revitalizing the City of Inglewood by providing an example of “smart growth” infill development consisting of mixed-use retail, office, hotel, residential development integrated with open space in job-rich area. The Project is economically viable and promotes the City’s economic well being by significantly increasing property and sales tax revenues while providing high-quality uses. The Proposed Project also has the opportunity for transient occupancy tax on the hotel site. Furthermore, the Proposed Project is preserving the Casino Card Club on the Project Site, which generates significant source of income to the City from the taxes associated with it. Thus, the Project is consistent with this strategy.
Encourage civic engagement.	The Proposed Project includes outdoor plazas, pedestrian networks, and eating areas which enhance the cultural fabric of the community. In addition, the proposed project would be a pedestrian-oriented development and contribute to a vibrant day and evening environment. The development would also include 25 acres of open space, which would include a water feature that would be accented by small-scale restaurants and cafes, commercial and residential uses along its perimeter. The project would also provide for the provision of a four-acre Civic site for an elementary school with joint uses (such as library, auditorium, etc) or other civic uses.
Principal 4: Promote sustainability for all generations	
Preserve rural, agricultural, recreational and environmentally sensitive areas.	As discussed above, the Proposed Project is an infill development project and would redevelop the existing 238-acre Hollywood Park Turf Club and Casino property in Inglewood. As an infill redevelopment in an urbanized area, the Proposed Project would not disturb rural, agricultural, recreational and environmentally sensitive areas. Thus, the project is consistent with this strategy.
Focus development in urban centers and existing cities.	The Project Site is in Inglewood, California, which is in an existing urban center within an existing built-out city. Given this, the project is consistent with this strategy.

<p>Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste.</p>	<p>As a mixed-use, infill development in an existing urbanized community, the Project accommodates growth that uses resources efficiently because it develops a mix of uses in an existing urbanized area accessible to transit and currently served by existing utilities and roadways, and is located in an area that is generally developed, thereby preserving other open space areas.</p> <p>As discussed above, as a new mixed-use development that integrates housing, civic, entertainment and retail amenities (jobs, parks, shopping opportunities, etc.), the Project will help reduce vehicle miles traveled resulting from discretionary automobile trips. Additionally, a mix of land uses will also contribute to the overall reduction in vehicle miles traveled by promoting alternative methods of transportation and creating provisions for non-vehicular travel (e.g. pedestrian pathways and paseos, bike paths, etc.) within the Project Site. In this way the Project will help reduce pollution in the region.</p> <p>The Specific Plan, through the Sustainability Checklist, also promotes reducing the amount of waste produced during the operational stage of the Project. Under “Goal 4: Reduce, Reuse and Recycle” in the Sustainability Checklist, Goal 4-5 will require each project within the Specific Plan to provide adequate space for storing and handling recyclables. For example, single family units will have dual bins for each unit—a recycle bin and a garbage bin. Multi-family units may have recycle bins and garbage bins for each unit or grouped recycling and garbage collection areas. All in all, the project is consistent with this strategy.</p>
<p>Utilize “green” development techniques.</p>	<p>The City of Inglewood does not have any local codes or policies that specifically address green building standards or climate change. However, the Proposed Project incorporates sustainability practices into the project design as a method to increase energy efficiency, reduce greenhouse gas emissions and promote green building practices. Specifically, PDF B-2, which is discussed in Section II, Project Description and Section IV.B, Air Quality, lists some sustainability measures to be incorporated into the Project’s design.</p> <p>Furthermore, as part of the Plot Plan Review process, the Hollywood Park Specific Plan requires submission of a completed “Sustainability Checklist” specifying those sustainability measures to be included in the development that is the subject of the Plot Plan Review/Building Permit. Therefore, the project is consistent with this strategy.</p>
<p><i>Source: Southern California Association of Government, “Compass Growth Vision Report” (June 2004). Consistency analysis provided by Christopher A. Joseph & Associates.</i></p>	

COMMENT 9.74

All Land Use Element policies are not listed in the section. There are included in a separate document. However, not all goals are listed. Specifically, relevant Goals listed under B. Residential, C. Commercial, E. Circulation and F. Community Facilities are not listed (pages 6-8 of the City of Inglewood Land Use Element).

RESPONSE 9.74

See Response to Comment 9.72, above.

COMMENT 9.75

A Land Use compatibility discussion that specifically addressed thresholds has been included. However, it is brief and conclusory. In addition, a discussion of land use compatibility for the mixture of land uses within the project has not been included. The DEIR should clearly identify all uses and how they are compatible. Locating residential adjacent to a casino use could be considered an incompatible use.

RESPONSE 9.75

See Response to Comment 9.71 for a discussion regarding land use compatibility and the potential divide an existing community.

Regarding the compatibility between the casino land use and the adjacent residential land uses, as discussed in the Project Description, the casino will remain in its current location on the Project Site. The land use plan for the Specific Plan has given careful consideration to the types of land uses that are placed adjacent to the casino. No Single-Family housing type would be located adjacent to the casino. However, multi-family housing will be located near the casino. To provide greater compatibility between the residential and casino land uses, the Specific Plan uses building siting and landscape buffers to shield the residential land uses from the casino uses. Specifically, the casino will be embedded in the retail/entertainment area in the Mixed-Use Zone. The circulation of the Project Site was designed specifically to retain the casino patrons in the retail/entertainment area. Patrons of the casino would have to walk through the retail/entertainment area in order to access the adjacent residential units. This lessens the potential incompatibility between casino and residential uses. In addition, there will be a landscape setback between the casino and the adjacent residential uses. As provided in the Specific Plan, the landscape setback will be 10' on either side of an 8' high wall for a total of 20' and will consist of a row of columnar evergreen trees on each side of the wall. Furthermore, there will be a surface parking lot separating the casino building from the residential uses and the casino building will be setback 30' from the casino lot line per Section 12-27.4 of the Inglewood Municipal Code. Through these land use planning techniques, the compatibility between the casino and adjacent residential land uses would be less than significant.

COMMENT 9.76

Additional zone change amendment discussion has been included per the prior comments. However, a discussion of the type, use, densities and development standards of the proposed zoning/ land use within the proposed Specific Plan has not been included. This discussion and a relevant chart/matrix of the differences between new and proposed land uses and standards and the proposed impacts should be included within the Section.

RESPONSE 9.76

See Response to Comment 9.68, which provides a chart/matrix of the key differences between the existing development standards in the Inglewood Municipal Code and the development standards in the

Hollywood Park Specific Plan.

COMMENT 9.77

The section has been updated to include discussion of Urban Blight (the entire HR&A report is attached as an appendix). This section is adequate. However, a discussion on cumulative effects of Urban Blight is discussed in a brief and conclusory manner and should be expanded for clarity.

RESPONSE 9.77

This comment acknowledges that the impact analysis relating to Urban Blight is adequate. With regard to cumulative effects of urban blight, as discussed on Page IV.I-33 of the Draft EIR, based on the projected growth in retail and related household expenditures, population and incomes to 2012, the year that the retail uses are scheduled to be open, the Primary Trade Area (PTA) will support an increase of about 669,000 square feet GLA of retail and related commercial space, the Secondary Trade Area (STA) will support about 1.7 million more square feet GLA of additional space, and the combined market area will support about 2.4 million square feet GLA of additional space, according to the Market Study (Appendix I of the Draft EIR). By 2018, when all of the Project's uses are open, the PTA will support an increase of about 1.7 million square feet GLA of retail and related commercial space, the STA will support another 4.4 million square feet GLA of space, and the entire market area will support about 6.0 million square feet. This suggests there is sufficient room in the trade area for additional retail area. The Project would capture approximately 93% of the net excess demand within the defined PTA in 2012, but would decline to 36% of the excess demand available for other retail projects in the area by 2018.

The Related Projects list includes some retail development projects, although some of these projects included potential City of Inglewood redevelopment projects for which no planning applications have been filed with the City. Based on the information presented in the Related Projects list, it is not clear whether the types of retail uses proposed for cumulative development would compete with the type of retail uses proposed for the Project. However, as noted above, with development of the Project, the PTA would have an excess capacity of 64% to support cumulative retail development by 2018. In addition, with development of the Project the STA would be able to support an excess capacity of 36% in 2012 and 86% in 2018, while the entire market area would have an excess capacity of 74% in 2012 and 90% in 2018. Although the Project provides a portion of the retail able to be supported in the PTA, STA and entire market area, there is capacity for other cumulative retail development to service the needs of the market. As a result, the cumulative impact of the Project on economically caused urban blight or decay is not cumulatively considerable, and the impact is, therefore, less than significant.

COMMENT 9.78

Noise

The noise technical review is based upon the comments received from the City (dated September 23, 2008) and standard methodology provided by the Federal Highway Administration (FHWA), California

Department of Transportation (CALTRANS), the Federal Transit Authority (FTA), and the City's local rules and regulations. Review of both the draft noise section and the technical noise study indicate that the majority of the City's comments (N-1 through N-24) were addressed and revised within the text. The following comments are minor revisions to the both Section G of the EIR and the technical report. The pages in the draft EIR are referenced below.

Pages IV.G-23:

A discussion of traffic related impacts to the on-site receptors should be provided.

RESPONSE 9.78

As requested by the commenter, analysis of the traffic related impacts to on-site receptors was conducted.

New sensitive receptors may be exposed to high traffic-related noise levels from off-site and on-site roadways. Residential land uses located along Prairie Avenue would be exposed to the loudest off-site traffic noise levels. As shown in Table IV.G-13, future noise levels along Prairie Avenue and in front of the project site would be approximately 73.3 dBA CNEL. Typical building construction provides a noise reduction of approximately 26 dBA with closed windows. Interior noise levels at proposed residential land uses along Prairie Avenue would be approximately 47.3 dBA. This noise level would exceed the 45 dBA interior noise significance threshold, and mitigation is proposed to reduce off-site traffic noise.

Noise levels generated by on-site traffic at residential land uses would be typical of other residential developments. These noise levels would typically be compatible with residential land uses. However, residential land uses adjacent to main internal roadways would potentially be exposed to interior noise levels that exceed the 45 dBA interior noise significance threshold. Mitigation is proposed to reduce residential noise exposure from on-site traffic activity to meet the 45 dBA interior noise standard. Please see MM G-7, as amended per Response 9.79.

COMMENT 9.79

Pages IV.G-26:

Mitigation Measures MM G-7 should be refined to include who is responsible for reviewing and implementing the measures to ensure that noise levels within interior space of residential dwelling units achieve the 45 dBA noise standards. For example, the mitigation measure could include language similar to but not limited to the following:

- o Prior to the issuance of building permits, the Project Applicant shall demonstrate to the City of Inglewood that a qualified acoustical engineer has prepared an acoustical study that ensures that the indoor standard of 45 dBA has been achieved at residential dwelling units.

RESPONSE 9.79

All residential units shall be designed to minimize noise effects from non-residential activities on the project site, including the casino, parking areas, loading zones, alarms from trucks in reverse, and commercial uses with exterior components (e.g., outdoor dining, special entertainment events, etc.). Residential units shall also be designed to minimize aircraft noise and off- and on-site traffic noise. These design measures shall be established to maintain noise levels at interior spaces to be within the 45 dBA noise standard established by Titles 21 and 24. Measures to meet the 45 dBA standard may include, but not be limited to, using construction techniques/materials with an STC rating of 40 in habitable rooms/areas, the use of perimeter walls, or sound-rated interior walls between uses or other site planning and building placement that could reduce or eliminate the line of sight between the noise source and residential units.

This comment is noted for the record and the Additions and Corrections Section of the Final EIR will be amended to refine Mitigation Measure MM G-7. Specifically, Mitigation Measure MM G-7 on Pages IV.G-27 and I-36 will be amended to read as follows:

MM G-7. ~~All residential units shall be designed to minimize noise effects from non-residential activities on the project site, including the casino, parking areas, loading zones, alarms from trucks in reverse, and commercial uses with exterior components (e.g., outdoor dining, special entertainment events, etc.). Residential units shall also be designed to minimize aircraft noise and off- and on-site traffic noise. These design measures shall be established to maintain noise levels at interior spaces to be within the 45 dBA noise standard established by Titles 21 and 24. Measures shall to meet the 45 dBA standard may include, but not be limited to, using construction techniques/materials with an STC rating of 40 in habitable rooms/areas, the use of perimeter walls, or sound-rated interior walls between uses, or other site planning and building placement that could reduce or eliminate the line of sight between the noise source and residential units.~~ Prior to the issuance of building permits, the Project Applicant shall utilize an acoustical engineer to demonstrate to the City of Inglewood that the 45 dBA interior noise standard has been achieved at residential dwelling units.

COMMENT 9.80***Population and Housing***

No comments.

RESPONSE 9.80

This comment confirms the commenter has no comments with regard to the Population and Housing Section of the Draft EIR. No response is warranted.

COMMENT 9.81***Public Services***

The section does not state that the project's contribution of 66 percent of the increase in population in the City would be significant and place substantial increased demand on public services, and there is no mention of appropriate mitigation measures. These numbers should be compared to SCAG projections. These issues need to be addressed in the Final EIR.

RESPONSE 9.81

The Draft EIR has disclosed that the Project's increase in population in the City would place an increase on demand for public services. In recognition of the potential significant impact, the Project proposes 15 mitigation measures and includes Project Design Features to help reduce the Project's impacts on the demand for public services.

The Draft EIR also discusses the Project's projected increase in population as compared to SCAG projections in Section IV. H. Population, Housing & Employment. As disclosed on Page IV.H-22, the "Proposed Project's population increase would not be consistent with the [SCAG] regional growth projections as the population growth generated by the Proposed Project would exceed the total anticipated growth for 2015 by 7,678 persons. This inconsistency, however, is attributed to the fact that the City of Inglewood is built out and has few remaining undeveloped parcels available to accommodate future growth. The Proposed Project would redevelop an existing racetrack facility which would require an adoption of a Specific Plan and amendments to the City's General Plan and the Merged Redevelopment Plan, and a zone change. As the Proposed Project was not anticipated at the time SCAG prepared their 2008 RTP (Regional Transportation Plan), the anticipated population and housing growth associated with the Proposed Project was not included within the 2008 RTP update. Nevertheless, the population growth anticipated by the Proposed Project would not result in a significant environmental impact, as the surrounding infrastructure would be able to accommodate the proposed development. As noted in Sections IV.F, Hydrology/Water Quality, IV.J, Public Utilities, IV.K, Public Services, and IV.L, Traffic/Transportation, with implementation of the Proposed Project Design Features and recommended mitigation measures, the existing local and regional infrastructure can accommodate the unanticipated growth of the project. However, due to the Proposed Project's technical inconsistency with the population growth projections for the City, impacts to population growth would be considered a significant impact."

COMMENT 9.82

Page IV.K-1

The statistics requested for Beat 3 are not included in the body of the text and Chief Seabrook's memo is not included in the Appendices or referenced to in any other section. These changes need to be made in the Final EIR.

RESPONSE 9.82

The statistics for Beat 3 were inadvertently omitted from the Draft EIR. While Beat 3 was identified in the first paragraph on page IV.K-1 of the Draft EIR as serving the Project Site, the specific characteristics of Beat 3 as provided in Chief Seabrooks January 2, 2008 correspondence were not included. This information was superseded by the statistics provided for Reporting District 27 that was provided in Chief Seabrooks previous correspondence dated November 29, 2007. The following information will be added to the Additions and Corrections Section of the Final EIR:

“The Beat 3 area (north of Century Boulevard and east of Prairie Avenue) consists of Council District 1 that currently serves approximately 29,541 persons (using the 2006 population census of 118,164 divided by four Beats or Council Districts). One part-time civilian and one Senior Lead Officer serve the Beat 3 Police Community Center and Beat 3, District 1 areas. Beat 3 areas are served 24/7 by either one assigned Patrol car or “wild” unit, as Patrol shifts dictate. Additionally this does not include several specialized Units, such as motors, 32 civilian special enforcement officers and anti-crime enforcement teams that serve the City at various times and days.”

Please refer to Appendix A-3 of the Draft EIR labeled “Public Agency & Response Letters” for copies of the Chief of Police’s memoranda dated January 2, 2008 and November 29, 2007.

COMMENT 9.83

Page IV.K-43

The DEIR does discuss the proposed open space in the development, but does not designate how much of the proposed 25 acres is for private versus public use. The document mentions the cumulative impact on the demand for park space, but does not specify if the other developments will add to the total park space acreage for the city. Also, there is no mention of Quimby Act fees in the document, or a discussion that they will be addressed in the Development Agreement. Development impact fees should be addressed for all public services given the substantial increase in population as a result of the proposed project.

RESPONSE 9.83

The Project proposes to create 25 acres of park and open space areas, of which 2.5 acres will be designed as a private Homeowners’ Association facility. The remaining 22.5 acres will be accessible by the general public.

At the time of circulation of the Draft EIR, Inglewood did not have a park dedication ordinance pursuant to the Quimby Act and thus the Draft EIR did not analyze the Project with respect to any ordinance for park dedication. Please refer to Response 6.7 for a discussion regarding the Project’s consistency with the newly adopted park dedication ordinance pursuant to the Quimby Act.

With regard to cumulative impacts, based on the information available about the Related Projects, it is not clear whether any of the projects propose to dedicate parkland to the City. However, since the City has now adopted a park dedication ordinance pursuant to the Quimby Act, certain projects on the Related Projects List that have a residential component would be required to comply with the land dedication or fee requirements under the ordinance.

COMMENT 9.84***Traffic***

Page IV.L-15/16

The explanation of the Institute of Transportation Engineers (ITE) residential land use trip generation is confusing. It is unclear how trip generation for the 2,995 du's was identified. The number of trips generated by land use is relevant in determining the significance of project impacts. Why was it determined that the ITE numbers would be lower than traffic study data or vice-versa? Was the number of projected residents considered?

RESPONSE 9.84

The commenter is referring to the Project Trip Generation section on Pages IV.L-12/16 of the DEIR. As part of the analysis of trip generation by the residential land uses, the actual underlying data points used in the ITE Trip Generation publication was reviewed. The two largest sites of dwelling units surveyed in the Trip Generation publication range between 900 and 1,300 dwelling units. The Trip Generation publication plots the data surveyed and develops an average rate line and a fitted curve. A review of the underlying data points collected by ITE for the two largest survey sites reveals that the data points fit more closely to the fitted curve equation than the average rate line. It should be noted that although the number of larger scale type of residential survey sites are limited, the data available suggests that on larger scale residential survey sites the relationship between the number of dwelling units to vehicle trip ends is not linear in nature. Therefore, it was determined that the fitted curve equation will be more appropriate than the average rate line for application on larger scale residential land uses, like the Project. However, since the ITE Trip Generation publication for this land use does not contain survey sites with more than 1,300 dwelling units, the DEIR used the fitted curve methodology to develop an average rate line based on the clustering of dwelling units at 600 for weekdays and 400 for weekends (Refer to Footnote [2], Table 6-1 on Page 36, Appendix G-1 of the DEIR for a summary of trip generation rates developed for the 2,995 dwelling units.). The developed average rate line was then applied to the 2,995 units in the Proposed Project, yielding the trip generation forecast for the residential land use of the Project. (See Table below for comparison of trips generated using the two approaches.)

Forecast	Weekday			Weekend	
	Daily	AM	PM	Daily	Midday
Forecast Provided in DEIR [Developed Average Rate Line]	14,706	1,078	1,318	14,046	1,198
Forecast Using Unadjusted ITE Trip Rate [Fitted Curve Approach]	11,544	783	976	11,270	911

Please refer to Appendix K-9 of the FEIR for a graphical representation of the weekday PM peak hour residential trip generation using the two approaches described.

The typical independent variable in traffic engineering practice for residential land use is the measurement of average vehicle trip ends based on the number of residential dwelling units. As a result, the number of projected residents was not considered necessary in the development of the traffic generation.

COMMENT 9.85

Page IV.L-27

Description of Level of Service (LOS) is unclear. LOS should be clearly explained so that potential impacts can be clearly understood.

RESPONSE 9.85

Page IV.L-28 of the DEIR refers to the traffic impact study for descriptions of the Intersection Capacity Utilization (ICU) and the Critical Movement Analysis (CMA) methods as well as the corresponding Levels of Service (LOS). As stated in Appendix C of the Traffic Impact Study, in DEIR Appendix G-1, LOS for both ICU as well as CMA analysis method is given below:

INTERSECTION CAPACITY UTILIZATION (ICU) DESCRIPTION

Level of Service is a term used to describe prevailing conditions and their effect on traffic. Broadly interpreted, the Levels of Service concept denotes any one of a number of differing combinations of operating conditions which may occur as a roadway is accommodating various traffic volumes. Level of Service is a qualitative measure of the effect of such factors as travel speed, travel time, traffic interruptions, freedom to maneuver, safety, driving comfort and convenience.

Six Levels of Service, A through F, have been defined in the 1965 Highway Capacity Manual, published by the Transportation Research Board. Level of Service A describes a condition of free flow, with low traffic volumes and relatively high speeds, while Level of Service F describes forced traffic flow at low speeds with jammed conditions and queues which cannot clear during the green phases.

The Intersection Capacity Utilization (ICU) method of intersection capacity analysis has been used in our studies. It directly relates traffic demand and available capacity for key intersection movements, regardless of present signal timing. The capacity per hour of green time for each approach is calculated based on the methods of the Highway Capacity Manual. The proportion of total signal time needed by each key movement is determined and compared to the total time available (100 percent of the hour). The result of summing the requirements of the conflicting key movements plus an allowance for clearance times is expressed as a decimal fraction. Conflicting key traffic movements are those opposing movements whose combined green time requirements are greatest.

The resulting ICU represents the proportion of the total hour required to accommodate intersection demand volumes if the key conflicting traffic movements are operating at capacity. Other movements may be operating near capacity, or may be operating at significantly better levels. The ICU may be translated to a Level of Service as tabulated below.

The Levels of Service (abbreviated from the Highway Capacity Manual) are listed here with their corresponding ICU and Load Factor equivalents. Load Factor is that proportion of the signal cycles during the peak hour which are fully loaded; i.e. when all of the vehicles waiting at the beginning of green are not able to clear on that green phase.

Intersection Capacity Utilization Characteristics		
Level of Service	Load Factor	Equivalent ICU
A	0.0	0.00 - 0.60
B	0.0 - 0.1	0.61 - 0.70
C	0.1 - 0.3	0.71 - 0.80
D	0.3 - 0.7	0.81 - 0.90
E	0.7 - 1.0	0.91 - 1.00
F	Not Applicable	Not Applicable

Service Level A

There are no loaded cycles and few are even close to loaded at this service level. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication.

Service Level B

This level represents stable operation where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.

Service Level C

At this level stable operation continues. Loading is still intermittent but more frequent than at Level B. Occasionally drivers may have to wait through more than one red signal indication and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.

Service Level D

This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak hour, but enough cycles with lower demand occur to permit periodic clearance of queues, thus preventing excessive backups. Drivers frequently have to wait through more than one red signal. This level is the lower limit of acceptable operation to most drivers.

Service Level E

This represents near capacity and capacity operation. At capacity (ICU = 1.0) it represents the most vehicles that the particular intersection can accommodate. However, full utilization of every signal cycle is seldom attained no matter how great the demand. At this level all drivers wait through more than one red signal, and frequently through several.

Service Level F

Jammed conditions. Traffic backed up from a downstream location on one of the street restricts or prevents movement of traffic through the intersection under consideration.

CRITICAL MOVEMENT ANALYSIS (CMA) DESCRIPTION

Level of Service is a term used to describe prevailing conditions and their effect on traffic. Broadly interpreted, the Level of Service concept denotes any one of a number of differing combinations of operating conditions which may take place as a roadway is accommodating various traffic volumes. Level of Service is a qualitative measure of the effect of such factors as travel speed, travel time, interruptions, freedom to maneuver, safety, driving comfort and convenience.

Six Levels of Service, A through F, have been defined in the 1965 Highway Capacity Manual. Level of Service A describes a condition of free flow, with low traffic volumes and relatively high speeds, while Level of Service F describes forced traffic flow at low speeds with jammed conditions and queues which cannot clear during the green phases.

Critical Movement Analysis (CMA) is a procedure which provides a capacity and level of service geometry and traffic signal operation and results in a level of service determination for the intersection as a whole operating unit.

The per lane volume for each movement in the intersection is determined and the per lane intersection capacity based on the Transportation Research Board (TRB) Report 212 (Interim Materials on Highway Capacity). The resulting CMA represents the ratio of the intersection's cumulative volume over its respective capacity (V/C ratio). Critical Movement Analysis takes into account lane widths, bus and truck operations, pedestrian activity and parking activity, as well as number of lanes and geometrics.

The Level of Service (abbreviated from the Highway Capacity Manual) are listed here with their corresponding CMA and Load Factor equivalents. Load Factor is that proportion of the signal cycles during the peak hour which are fully loaded; i.e. when all of the vehicles waiting at the beginning of green are not able to clear on that green phase.

Critical Movement Analysis Characteristics		
Level of Service	Load Factor	Equivalent CMA
A (free flow)	0.0	0.00 - 0.60
B (rural design)	0.0 - 0.1	0.61 - 0.70
C (urban design)	0.1 - 0.3	0.71 - 0.80
D (maximum urban design)	0.3 - 0.7	0.81 - 0.90
E (capacity)	0.7 - 1.0	0.91 - 1.00
F (force flow)	Not Applicable	Not Applicable

Service Level A

There are no loaded cycles and few are even close to loaded at this service level. No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication.

Service Level B

This level represents stable operation where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.

Service Level C

At this level stable operation continues. Loading is still intermittent but more frequent than at Level B. Occasionally drivers may have to wait through more one red signal indication and backups may develop behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so.

Service Level D

This level encompasses a zone of increasing restriction approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak hour, but enough cycles with lower demand occur to permit periodic clearance of queues, thus preventing excessive backups. Drivers frequently have to wait through more than one red signal. This level is the lower limit of acceptable operation to most drivers.

Service Level E

This represents near capacity and capacity operation. At capacity (CMA = 1.0) it represents the most vehicles that the particular intersection can accommodate. However, full utilization of every signal cycle is seldom attained no matter how great the demand. At this level all drivers wait through more than one red signal, and frequently through several.

Service Level F

Jammed conditions. Traffic backed up from a downstream location on one of the street restricts or prevents movement of traffic through the intersection under consideration.

COMMENT 9.86

Page IV.L-28

The proposed project build out year of 2015 as stated in the project description is not consistent with the analysis, which analyzes a 2014 build-out.

RESPONSE 9.86

The traffic impact study appropriately analyzed Year 2014 as the project build-out year. Any references in the DEIR to a build-out of 2015 will be corrected in the Final EIR.

COMMENT 9.87

It is unclear what the thresholds were used:

- o Appendix G thresholds are not used
- o Not clear what would constitute an impact
- o Not clear whether City of Inglewood significance criteria is utilized for all intersections or County of Los Angeles significance criteria statement that Inglewood Policy is same as County CMP. Where is this policy set forth?

What about City of Los Angeles, Culver City, City of Hawthorne criteria and thresholds? These are not addressed; thresholds of significance may be different and result in significant impacts that are not identified in the DEIR.

RESPONSE 9.87

In accordance with Appendix G to the State CEQA Guidelines, a significant impact with regard to Transportation/Traffic would occur if the Project were to result in any of the following conditions:

- a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?
- b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?
- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- e) Result in inadequate emergency access?
- f) Result in inadequate parking capacity?
- g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Impacts Determined to be Less Than Significant

With respect to threshold (c) the Proposed Project does not include any aviation-related uses. With respect to threshold (d) the Proposed Project would not introduce any hazardous design features that would impact the circulation system. With respect to threshold (g) the Proposed Project is not expected to conflict with adopted policies, plans, or programs supporting alternative transportation. Additionally, the Proposed Project includes both residential and commercial components which may encourage working and living within the same development. Therefore, no further analysis of these topics is required. Topics (a), (b), (e) and (f) are discussed below.

With respect to threshold (e), as stated on Page IV K-19, construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant for the following reasons:

(1) construction impacts are temporary in nature and do not cause lasting effects; and (2) partial lane closures would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the project site, flagmen would be used to facilitate the traffic flow until construction is complete. Project construction would not be expected to impact fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LACoFD. Therefore, impacts to emergency access services would be less than significant.

With respect to threshold (f), Parking summary is contained in the DEIR under its own section (refer to Pages IV.M-1 through IV.M-16). Through the parking requirements established in the Hollywood Park Specific Plan, the Proposed Project would provide adequate parking in accordance with the actual parking demands during each phase of development and occupancy. The Proposed Project may include up to approximately 7,778 structured and surface parking spaces in the Mixed Use Zone, while the residential parking on the residential land uses would be parked according to the Hollywood Park Specific Plan and could include up to approximately 7,700 spaces (depending on final bedroom counts of the total residential units developed). Application of both mixed-use and residential parking standards for the Proposed Project would meet the parking demand generated by the Project. As a result, all of the project's parking demands would be met within the Project Site, and as such, impacts to parking would be less than significant.

With respect to thresholds (a) and (b), the Traffic and Transportation section of the DEIR goes in significant detail on impacts caused by increase in traffic and level of service. (Refer to Pages IV.L-1 through IV.L-86 of DEIR.)

Refer to Page IV.L-28 of the DEIR for examples of when a significant transportation impact would occur at an intersection and when it would not. Per the City of Inglewood's policy, the significance of the potential impacts of project generated traffic at each study intersection was identified using criteria set forth in the 2004 Congestion Management Program for Los Angeles County, County of Los Angeles Metropolitan Transportation Authority, July 2004 (CMP) manual. A significant transportation impact is determined based on a change in the calculated v/c ratio of two percent (0.02) or more due to project-related traffic for an intersection operating at LOS F or worse ($v/c > 1.00$). Using these criteria, for example, the project would not have a significant impact on an intersection if it is operating at LOS E or better after the addition of project traffic. However, if the intersection is operating at LOS F after the addition of project traffic and the project related increase in v/c ratio is 0.020 or more, then a significant project impact would result at the intersection. These criteria were applied to all 66 study intersections.

Also on Page IV.L-28 of the DEIR, it states that the City of Inglewood significance criteria were applied to all study intersections.

It is a policy in practice that the City of Inglewood follows the Los Angeles County CMP's significance criteria in the determination of transportation impacts. Other recently approved traffic impact studies located in the immediate vicinity of the proposed Hollywood Park project have also been appropriately prepared on this basis. For example, traffic impact studies prepared for the approved Renaissance Residential Project, the Village at Century Project, and the Home Stretch Project, all followed the same significance criteria which are consistent with those set forth in the Los Angeles County CMP, and thus is appropriate for use in the DEIR prepared for the Project.

The California Environmental Quality Act (CEQA) requires that a Lead Agency consider and disclose potential environmental impacts of a project prior to the required approval/denial action by decision makers. For the proposed Hollywood Park Redevelopment Project, the traffic impact analysis was prepared in accordance with the methodologies and application of the significance thresholds approved for use by the City of Inglewood (the Lead Agency). Project related impacts as well as cumulative impacts were identified and appropriate transportation mitigation measures were considered and disclosed on this basis. In addition, the traffic impact study also included a supplemental analysis for the study intersections located outside the City of Inglewood using the local jurisdiction methodologies and significance thresholds. Refer to Section 11.0, Pages 108-110, Appendix G-1 of the DEIR for the supplemental traffic analysis using the local jurisdiction methodologies and significance thresholds.

COMMENT 9.88

No regulatory setting discussion or analysis in the traffic section. No discussion regarding City of Inglewood standards, no clear discussion of county of Los Angeles CMP standards.

RESPONSE 9.88

There are no relevant federal regulations applicable to the Proposed Project. All applicable state and local policies are discussed throughout the section under "Traffic Impact Analysis Method" and "Impact Criteria and Thresholds." As noted in Response 9.86, refer to Page IV.L-28 of the DEIR for the City of Inglewood significant impact criteria and thresholds. Refer to Pages IV.L-52/56-58 of the DEIR for the County of Los Angeles Congestion Management Program (CMP) traffic impact assessment, which includes a discussion on the CMP significant impact standards. (Refer to Response 9.87 for further detail on CMP analysis.)

COMMENT 9.89

Page IV.L-47/48

CMP freeway analysis and Table L-4. Need to show how forecast project trips were generated, for example, how would the project result in -562 trips on EB 105 during PM Peak hour?

RESPONSE 9.89

The commenter is referring to the CMP freeway analysis section on Pages IV.L-57-- L. IV-58 of the DEIR. The CMP freeway traffic impact assessment included in the traffic study contained a more detailed breakdown of the forecast project trips and the existing project trips to be removed at each of the CMP analysis locations. Appendix G-1 of the DEIR contains a complete copy of the traffic analysis. Refer to Table 14-2 on Page 136, Appendix G-1 of the DEIR for a summary of the forecast project trips during the analysis peak hours. The net new project trips are determined by subtracting the existing project trips (i.e., those trips forecast to utilize the street system during a weekday live horse racing event with 10,000 attendance) from the forecast project trips. In the commenter's example on the CMP monitoring station on the eastbound I-105 freeway (east of Crenshaw Boulevard), the project is forecast to generate a total of 270 trips during the PM peak hour on this CMP freeway segment while a weekday live horse racing event with 10,000 attendance is forecast to generate 832 trips during this time period. Since the existing Hollywood Park racetrack will be removed to accommodate the proposed project, the result would be a reduction of 562 PM peak hour potential trips on this freeway segment.

It should be noted that based on other comments provided regarding racetrack attendance levels and follow up coordination with the City of Inglewood, an updated traffic impact analysis was prepared. Refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis. As shown in the Technical Memorandum summarizing the updated traffic impact analysis, on the CMP monitoring station on the eastbound I-105 freeway (east of Crenshaw Boulevard) as referenced in the commenter's example, the Project is forecast to generate a total of 270 trips during the PM peak hour on this CMP freeway segment while an updated weekday live horse racing event with 8,700 attendance is forecast to generate 728 trips during this time period. Since the existing Hollywood Park racetrack will be removed to accommodate the proposed project, the result would be a reduction of 458 PM peak hour potential trips on this freeway segment based on the updated traffic impact analysis.

COMMENT 9.90

If project results in 79 AM peak transit trips and 828 transit trips over 24-hour period, how are PM peak transit trips negligible? This is a potentially significant impact not identified in the DEIR.

RESPONSE 9.90

The commenter is referring to the CMP transit review section on Page IV.L-58 of the DEIR. As stated on Page IV.L-58 of the DEIR, the proposed project is forecast to generate a demand for 79 new transit trips during the weekday AM peak hour and 844 new transit trips over a 24-hour period (as opposed to 828 daily transit trips as noted by the commenter). Per the CMP guidelines, to calculate new transit trips, the project's trip generation by the CMP factor (determined by LA County). During the weekday PM peak hour, the proposed project generates 39 less trips (factoring in the existing traffic conditions that are removed). As a result, the Project is anticipated to generate nominal new transit trips during the PM peak hour. It is recognized that the proposed project may generate some transit usage during the weekday PM

peak hour. However, this transit demand is forecast to be offset by transit usage in association with the existing uses on-site (which will be removed to accommodate the proposed project). It is anticipated that the existing transit service in the project area will adequately accommodate the project generated transit trips. The Project Site vicinity is currently served by approximately 70 buses per hour during the AM peak hour. Thus, the project will generate on average one to two new boardings/alightings per bus in the AM peak hour. Therefore, given the number of transit trips generated by the project, the relatively high number of existing transit routes in the project vicinity, and the available transit ridership data, it is concluded that the public transit system will not be significantly impacted by the proposed project. As the transit review was prepared in accordance to the County of Los Angeles CMP procedures, there is no potentially significant impact not identified in the DEIR.

It should be noted that based on other comments provided regarding racetrack attendance levels and follow up coordination with the City of Inglewood, an updated traffic impact analysis was prepared. Refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis. As shown in the Technical Memorandum summarizing the updated traffic impact analysis, the Proposed Project is forecast to generate a demand for 79 new transit trips during the weekday AM peak hour, 21 new transit trips during the weekday PM peak hour, and 956 new transit trips over a 24-hour period. The Project Site vicinity is currently served by approximately 60 buses per hour during the PM peak hour. Thus, the Project will generate on average of less than one boarding/alighting per bus in the PM peak hour. Therefore, given the number of transit trips generated by the project, the relatively high number of existing transit routes in the project vicinity, and the available transit ridership data, it is concluded that the public transit system will not be significantly impacted by the Proposed Project based on the updated traffic impact analysis.

COMMENT 9.91

Page IV.L-49

How are worker trip ratios determined?

RESPONSE 9.91

The commenter is referring to the construction traffic trip generation section on Page IV.L-59 of the DEIR. During the final grading and structure construction period where the greatest potential for construction impact on the adjacent street system would occur, a trip generation rate of 0.36 worker vehicle trips per unit of residential development per day and 0.32 worker vehicle trips per 1,000 square feet of commercial development per day is utilized. These trip generation rates are based on information contained in the Sacramento Metropolitan Air Quality Management District's Air Quality Thresholds of Significance Handbook (Sacramento Metropolitan Air Quality Management District (1994).

COMMENT 9.92

Section 5-41 of the Municipal Code would prohibit any construction activity, including workers arriving

on site prior to 7 AM. Therefore, worker trips would occur during AM peak hours. The DEIR fails to analyze the impact of construction worker trips during the AM peak hour.

RESPONSE 9.92

The commenter's statement "Section 5-41 of the Municipal Code would prohibit any construction activity, including workers arriving on site prior to 7 AM" is not correct. Specifically, Section 5-41 of the Inglewood Municipal Code-Construction of Building and Projects, Noise Regulated, states:

"It shall be unlawful for any person within a residential zone, or within a radius of five hundred (500) feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures, or projects or to operate any pile driver, pneumatic hammer, derrick, excavation or earth moving equipment, or other construction equipment between the hours of eight p.m. and seven a.m. of the next day in such a manner that a reasonable person residing in the area is caused discomfort or annoyance unless beforehand a permit therefor has been obtained from the Permits and Licenses Committee of the City. (Ord. 88-29 9-13-88)"

The Code prohibits persons from operating equipment or perform outside construction work before 7:00 AM, unless a permit has been obtained. However, contrary to the commenter's statement, the Code does not prohibit construction workers from arriving the construction site prior to 7:00 AM. As stated on Page IV.L-59 of the DEIR, construction workers are expected to typically arrive the project site before 7:00 AM and most depart before 3:00 PM. Thus, these construction work trips would occur outside of the peak hour of traffic on the local street system. For example, as shown in the traffic study, the peak hour of traffic at the study intersections adjacent to the project site begins between 7:15 AM and 7:30 AM.

It should be noted that although most construction workers are expected to arrive the project site prior to 7:00 AM, the construction impacts section of the DEIR (Pages IV.L-59/60) assumes that ten percent of the daily construction worker trips will arrive during the AM peak hour (which begins between 7:15 AM and 7:30 AM) so as to remain conservative. Also, since the racetrack would close prior to the construction phase of the Project, the construction worker trips would replace the trips of the racetrack employees. As a result, the DEIR adequately and conservatively analyzed the construction impacts during the weekday AM peak hour.

COMMENT 9.93

Page IV.L-46

The term PCE should be defined.

RESPONSE 9.93

PCE is the acronym for Passenger Car Equivalency in the traffic engineering practice. Page IV.L-60 of the DEIR provides this reference. It is typically a factor utilized to account for the presence of heavy

vehicles (such as truck traffic) in the traffic stream. A PCE factor of 2.0 is typically utilized to reflect that one truck trip is equivalent to two passenger vehicle trips.

COMMENT 9.94

The DEIR must identify the project's fair-share contribution to project-related mitigation.

The DEIR must identify how the fair-share contribution for cumulative mitigation was determined.

RESPONSE 9.94

As summarized on Page IV.L-75 of the DEIR, application of the City of Inglewood significance criteria to the "With Proposed Project" scenario indicates that six of the study intersections are anticipated to be significantly impacted due to traffic generated by the Hollywood Park Redevelopment project. The project applicant proposes as its primary mitigation strategy the full funding (i.e., not fair share or proportionate share) to develop and enhance the City's Intelligent Transportation System (ITS) at these six intersections, and 13 additional intersections. It is not necessary to identify the project's fair-share contribution to these project-related mitigation measures since the project applicant will provide 100% of the funding. It should be noted that in addition to the project's six impacted intersections, the project applicant will also provide the full funding for a traffic signal synchronization network at an additional 13 intersections. Refer to Pages IV.L-75/77-79 of the DEIR for a discussion of the 19 ITS improved intersections.

Appendix G-1 of the DEIR contains a complete copy of the traffic analysis. Refer to Section 12.2 and Table 12-1 on Pages 122-125, Appendix G-1 of the DEIR for a discussion of the fair-share analysis which includes the methodology and calculations on how the fair-share percentages are determined. The methodology and the calculations of the project's pro-rata percentage at the study intersection that require cumulative improvements are summarized in Table 12-1. The method used for these calculations was based on the project generated traffic volumes on the approaches to each affected study intersection during the impacted peak hour(s) divided by the project plus other development (related) projects traffic volumes on those same approaches for the same impacted peak hour(s). It should be noted that neither existing traffic volumes nor ambient growth traffic volumes are included in the calculations. As shown in Table 12-1, the proposed project's fair share contribution toward the cumulative improvements ranges from no contribution to 22.6 percent.

It should be noted that based on other comments provided by the City of Inglewood, an updated traffic impact analysis was prepared. Refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis. As shown in the Technical Memorandum summarizing the updated traffic impact analysis, the Proposed Project's fair share contribution toward the cumulative improvements ranges from no contribution to 25.5 percent.

COMMENT 9.95

Only discussion of transit is how it relates to CMP, not Appendix G threshold. Should describe specific measures that would support alternative transportation. The availability of public transportation would influence project trips and the number of parking spaces required.

RESPONSE 9.95

As discussed in the public transit services section, Pages IV.L-8-11 of the DEIR, MTA currently provides bus transit service along the major roadways within the project vicinity. Additional review of other transit opportunities or alternative transportation was not conducted because the proposed project is not located close enough to an existing transit center. Generally, to achieve a measurable project vehicular trip reduction due to transit usage, the project should be located within one-quarter mile from a transit center. As discussed on Page IV.L-11 of the DEIR, the closest Metro Green Line Station is located approximately one mile to the southwest from the project site. As a result, additional transit demand/trips beyond the CMP guidelines were not assumed.

As correctly noted in the comment, the availability of public transportation would likely influence or reduce the project generated traffic and parking demand. However, the proposed project trip generation and traffic impact analyses were prepared on the basis that no transit reduction was assumed from the various project land use components. Therefore, the analyses prepared are considered to be conservative from project trip generation and traffic impact analyses standpoints.

With respect to threshold (g) from Appendix G, “Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?” this threshold was determined to have less than significant impacts because there are no conflicts with adopted policies, plans or programs supporting alternative transportation. (Refer to Response 9.86.)

COMMENT 9.96

There is a disconnect between figures and text in this section.

RESPONSE 9.96

All figure numbers in Section IV.L. Traffic/Transportation appear to match and are appropriately/correctly referenced in the text.

COMMENT 9.97

Table L-2 is the only indication of project-related impacts; the DEIR needs a discussion of what the impacts would be, not just a table.

RESPONSE 9.97

The DEIR did include text discussions of the project-related significant traffic impacts. Refer to the Future with Proposed Project Conditions section, Pages IV.L-51/52, for a summary of the significant project impacts during the weekday AM peak hour, weekday PM peak hour, and Saturday Midday peak hour analysis time periods.

As shown in Table IV.L-2, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the proposed project is expected to create a significant impact at five of the study intersections during the AM and/or PM peak hours. Incremental but not significant impacts are noted at the remaining 61 study intersections during the weekday AM and PM peak hours. The five study intersections that are identified to be significantly impacted by the project during the weekday AM and/or the PM peak hours are as follows:

- Intersection No. 18: La Brea Avenue/Centinela Avenue
- Intersection No. 19: La Brea Avenue/Florence Avenue
- Intersection No. 22: La Brea Avenue/Century Boulevard
- Intersection No. 25: Prairie Avenue/Florence Avenue
- Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard

The future with project (existing, ambient growth and project) traffic volumes at the study intersections for the weekday AM and PM peak hours are displayed in Figures IV.L-16 and IV.L-17, respectively.

As shown in Table IV.L-2, application of the City's threshold criteria to the "With Proposed Project" scenario indicates that the proposed project is expected to create a significant impact at two of the study intersections during the Saturday mid-day peak hour. As indicated in Table IV.L-2, incremental but not significant impacts are noted at the remaining 64 study intersections during the Saturday mid-day peak hour. The two study intersections that are identified to be significantly impacted by the project during the Saturday mid-day peak hour are as follows:

- Intersection No. 45: Crenshaw Boulevard/Manchester Boulevard;
- Intersection No. 47: Crenshaw Boulevard/Century Boulevard

The future with project (existing, ambient growth and project) traffic volumes at the study intersections for the Saturday mid-day peak hour are displayed in Figure IV.L-18.

It should be noted that based on other comments provided by the City of Inglewood, an updated traffic impact analysis was prepared. Refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis. As shown in Table 6 of the Technical Memorandum summarizing the updated traffic

impact analysis, no additional project-related impacts (besides those already identified in the Draft EIR Traffic Impact Study) would result in the updated traffic impact analysis. In addition, no additional cumulative impacts (besides those already identified in the Draft EIR Traffic Impact Study) would result. As the results of the updated traffic impact analysis do not result in any new significant transportation impacts, the conclusions reported in the Draft EIR Traffic Impact Study remain valid.

COMMENT 9.98

The only mitigation for project related impacts are fair-share payments. The DEIR identifies no physical improvements, yet many cumulative impacts require physical improvements. The lack of identification of physical improvements and an analysis of their impacts renders the DEIR inadequate.

RESPONSE 9.98

The commenter's statement "The only mitigation for project related impacts are fair-share payments" is not correct because (1) the project includes physical roadway improvements as Project Design Features, and (2) the project provides 100% funding – not fair share – for Project related impacts.

First, the project proposes to increase vehicular capacity on Century Boulevard by widening the north side of Century Boulevard along the entire Hollywood Park project frontage to accommodate an additional travel lane. In addition, the project proposes to increase vehicular capacity on Prairie Avenue at the Arbor Vitae Street, Hardy Street, and 97th Street intersections by widening the east side of Prairie Avenue to provide exclusive right-turn only lanes at these intersections. Also, the traffic signal equipment at all the signalized intersections along the Hollywood Park's Prairie Avenue and Century Boulevard frontages will be modified accordingly. In addition, two new traffic signals are proposed to be installed: one on Century Boulevard and one on Prairie Avenue. All of these physical improvement measures, as described on Pages IV.L-73-75 of the DEIR, were analyzed in the traffic impact study as project design features and construction of these improvement measures will be the sole responsibility of the project.

Second, as summarized on Page IV.L-75 of the DEIR, application of the City of Inglewood significance criteria to the "With Proposed Project" scenario indicates that six of the study intersections are anticipated to be significantly impacted due to traffic generated by the Hollywood Park Redevelopment project. The project applicant proposes as its primary mitigation strategy the full funding (i.e., not fair share or proportionate share) to develop and enhance the City's Intelligent Transportation System (ITS) at these six intersections. In addition, the project applicant will also provide the full funding for a traffic signal synchronization network at an additional 13 intersections. Refer to Pages IV.L-75/77-79 of the DEIR for a discussion of the 19 ITS improved intersections. It should be noted that the only portion of the overall mitigation program in which the project will provide its fair share contribution is toward the cumulative mitigation measures. Refer to Page IV.L-79-84 of the DEIR for the cumulative impact mitigation measures and the project's fair share contribution.

Appendix G-1 of the DEIR contains a complete copy of the traffic analysis. It should be noted that the project mitigation section of the traffic analysis includes review of alternate physical mitigation measures for each of the six significantly impacted intersections. However, constraints/impacts such as restriction or elimination of curbside parking spaces, use of eminent domain to acquire private parcels to expand roadways, reduction or removal of raised median islands, substandard travel lane widths, and/or roadway alignment issues may result which will make these alternate measures infeasible. Refer to Pages 97-101, Appendix G-1 of the DEIR for a detail review of the proposed and alternate physical mitigation measures at the significantly impacted intersections.

Given the physical improvements incorporated into the Project as design features, 100% funding of ITS at the six intersections impacted by the project, 100% funding of ITS at 13 additional intersection not “significantly” impacted by the project, fair-share contribution at the intersections cumulatively impacted by the project, and the physical and jurisdictional constraints limiting implementation of additional physical mitigation measures, the traffic impact analysis in the DEIR is adequate as it fully discloses the impacts of the proposed project and fully mitigates the project’s impacts.

It should be noted that based on other comments provided by the City of Inglewood, an updated traffic impact analysis was prepared. Refer to Response to Comment 20.3 for a discussion of the updated traffic impact analysis. Refer to the Technical Memorandum for further discussion of the Crenshaw Boulevard/Century Boulevard intersection.

COMMENT 9.99

Utilities

The age of existing infrastructure is not discussed in the DEIR. Because of the aging infrastructure, there needs to be substantial evidence that it is adequate to serve the proposed project. Future upgrades may be required. Appropriate reevaluation of the adequacy of existing infrastructure in light of its age and condition may result in a significance conclusion different from that contained in the DEIR.

RESPONSE 9.99

Section IV.J, Public Utilities, in the Draft EIR includes project specific analyses related to Water Supply, Wastewater, Energy Conservation (Electricity and Natural Gas), and Solid Waste. As shown in the Draft EIR, each of these issue areas includes a thorough discussion of the existing infrastructure systems and the potential impacts related to the Proposed Project. Although the age of the infrastructure is certainly a factor, the Draft EIR was also based on the infrastructure’s current ability to meet existing demands, any known deficiencies in the project area, and utility will-serve letters that were received for the Proposed Project. Specifically, as provided in Appendix F-5 to the Draft EIR, the following letters were received: County Sanitation Districts of Los Angeles County & City of Inglewood Public Works Department (Wastewater), Los Angeles County Fire Department (Water/Fire Flow), Southern California Edison Company (Electricity), Southern California Gas Company, and West Basin Municipal Water District

(Recycled Water). Each of these letters provide the Proposed Project with the planning policies for each utility provider and how best to attain their services. As noted in the letters, the Proposed Project will be required to coordinate with each provider to receive the appropriate permits and approval, or pay the required fees associated with meeting the demands of the Proposed Project. With respect to water supply, Appendix F-6 to the Draft EIR includes a Water Supply Assessment approved by the City of Inglewood which meets the requirements of Sections 10910-10915 of the California Water Code. In addition, as provided in Appendix F-1 to the Draft EIR, a utilities and infrastructure report was prepared for the Proposed Project outlining the steps and processes required for project implementation. Accordingly, the evaluation of utility infrastructure systems presented in the Draft EIR is substantial and the impact conclusions provided therein are supported by substantial evidence.

COMMENT 9.100

The discussion of ‘Effects Not Found to be Significant’ is not included in the document. This needs to be added to the Final EIR.

RESPONSE 9.100

Section V.C of the Draft EIR includes a summary of the impacts that were found to be less than significant. No further response is required.

COMMENT 9.101

The DEIR does not adequately describe the Los Angeles County Sanitation Districts line. The DEIR should be revised to include this information.

RESPONSE 9.101

Appendix F-5 to the Draft EIR includes a service response letter from the County Sanitation Districts of Los Angeles County, which provides a summary of existing lines in the project area. In addition, page 6 of the Utilities and Infrastructure Technical Report provided as Appendix F-1 to the Draft EIR, includes a summary of the existing County and City infrastructure, which is restated on page IV.J-34 of the Draft EIR.

COMMENT 9.102

The DEIR is not clear as to what constitutes a substantial increase in electricity and natural gas demands.

RESPONSE 9.102

As provided on page IV.J-43 of the Draft EIR, the project’s potential energy conservation impacts were evaluated in accordance with Appendix G (Energy Conservation) of the State CEQA Guidelines. As stated in Response to Comment 9.99, above, the Draft EIR includes service response letters from

Southern California Edison Company, and the Southern California Gas Company, which outline their ability to meet potential project demand and the process for which the project can attain their services. Furthermore, the Utilities and Infrastructure Technical Report provided as Appendix F-1 to the Draft EIR, includes a through evaluation of the project's potential impacts related to energy conservation. No further response is required.

COMMENT 9.103

The DEIR states that the proposed development would not require infrastructure upgrades. Please see comment, above. Given the age of the infrastructure, the DEIR must include substantial evidence that future upgrades would not be required as a result of the proposed project.

RESPONSE 9.103

See Response to Comment 9.99, above.

COMMENT 9.104***Climate Change***

Although the terms 'global warming' and 'climate change' are often used interchangeably, these terms have different meanings. Global warming refers to a permanent increase in the average temperature of the atmosphere, while climate change refers to changes in weather patterns, precipitation, etc. These terms should be defined in the setting, and the text should be reviewed to ensure that the terms are used correctly throughout the section.

RESPONSE 9.104

Comment noted. For clarity, as the terms climate change and global warming are referred to in the EIR, the Governor's Office of Planning and Research defines the term *climate change* as any significant change in the measure of climate, such as average temperature, precipitation, or wind patterns over a period of time. Climate change may result from natural factors, natural processes, human activities that change the composition of the atmosphere and alter the surface and features of the land. Significant changes in global climate patterns have recently been associated with *global warming*, an average increase in the temperature of the atmosphere near the earth's surface, attributed to accumulation of GHG emissions in the atmosphere.³ These terms are generally used interchangeably in the Draft EIR, except where the specific circumstances require more precision as to the applicable regulations, consequently no revision to the EIR is required.

³ State of California, Governor's Office of Planning and Research, *Technical Advisory: CEQA and CLIMATE Change Through CEQA Review* (p.2).

COMMENT 9.105

Pages IV.B-9 and -10:

CEQA case law is an important component of the climate change regulatory context. The following legal cases and policies could be added to the regulatory setting:

- The State Attorney General's lawsuit against San Bernardino County, which challenged the lack of disclosure of climate change impacts in the County's General Plan Update EIR
- The settlement agreement between the Attorney General and the City of Stockton pertaining to the City's general plan climate change analysis
- SB 97, which directs the Office of Planning and Research to develop standards for analyzing climate change under CEQA
- Indicate that under AB 32 the Air Resources Board is responsible for preparing a scoping plan identifying statewide strategies for achieving the greenhouse gas targets, and identifying a baseline inventory for 1995 that can be used to determine numeric reductions
- Although Tide 24 is not a climate change policy per se, this policy reduces energy use, which in turn, reduces greenhouse gas emissions. Mitigation measures recommended by the Attorney General and ARB require projects to demonstrate increases in efficiency above Tide 24 standards. Therefore you may wish to include a discussion of this policy.

RESPONSE 9.105

While it is agreed that CEQA case law is an important component of the climate change regulatory context, and generally forms the basis for employing certain methodologies to address greenhouse gas emissions, citing the above legal cases and policies would not alter the findings or conclusions of the Draft EIR. The State Attorney General's lawsuit against San Bernardino County and a settlement agreement between the Attorney General and the City of Stockton are not directly relevant to the Proposed Project. SB 97 directs the Office of Planning and Research to develop standards for analyzing climate change under CEQA. Pursuant to Senate Bill 97 (Chapter 185, 2007) the Governor's Office of Planning and Research (OPR) is in the process of developing CEQA guidelines "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." OPR is required to "prepare, develop, and transmit" the guidelines to the Resources Agency on or before July 1, 2009. The Resources Agency must certify and adopt the guidelines on or before January 1, 2010.

With regard to AB 32, page IV.B-9 of the Draft EIR presents the following overview:

In September, 2006, Governor Schwarzenegger signed into law the California Global Warming Solutions Act of 2006 (Assembly Bill 32, codified at Section 38500 et seq. of the California Health

& Safety Code). This law requires the CARB to determine what the statewide greenhouse gas emissions level was in 1990 and design and implement emission limits, regulations, and other measures, such that by 2020 statewide greenhouse gas emissions are reduced in a technologically feasible and cost-effective manner to the 1990 level.

With respect to incorporating with meeting or exceeding Title 24 standards as a method to reduce greenhouse gas emissions, page IV.B-40 of the Draft EIR presents the following discussion:

By incorporating energy and VMT reducing project features such as designing, constructing, and operating the project to comply with Title 24, installing appliances, fixtures, and infrastructure that use less energy and water, creating approximately 25 acres of recreation/open space, and by locating housing near to mass transit and employment centers, the Proposed Project will result in lower GHG emission rates compared to current standards and practices.

COMMENT 9.106

Are there local policies pertaining to green building, energy efficiency, or climate change that might apply to the project? These should be summarized briefly.

RESPONSE 9.106

The City of Inglewood does not have any local codes or policies that specifically address green building standards or climate change. However, the Proposed Project incorporates sustainability practices into the project design as a method to increase energy efficiency, reduce greenhouse gas emissions and promote green building practices. Specifically, PDF B-2, which is discussed in Section II, Project Description and Section IV.B, Air Quality, is restated below for reference.

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

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

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

COMMENT 9.107

Page IV.B-18:

The text cites the “guidance” and “recommendations” in the 2008 CAPCOA report; however, CAPCOA states on the very first page of its report that: “This paper is intended as a resource, not a guidance document. It is not intended, and should not be interpreted, to dictate the manner in which an air district or lead agency chooses to address greenhouse gas emissions in the context of its review of projects under

CEQA.” To ensure legal accuracy, all references to the “CAPCOA guidance” should be removed. The CAPCOA report should be characterized more generally as a resource that summarizes available inventory methods and analysis approaches. State agencies and advisory bodies are generally very careful with the use of the word “guidance” because in many contexts it indicates a legally enforceable standard. The OPR Technical Advisory, for example, stresses that the guidance it provides is “informal”.

RESPONSE 9.107

Comment noted. All references in the Draft EIR that currently identify the 2008 CAPCOA Report as a “guidance” document shall be correctly changed to refer to that study as a “reference” document.

COMMENT 9.108

Page IV.B-19:

The text should provide a more detailed explanation of CO₂ equivalencies and global warming potentials (a sentence or two to indicate how they apply to the inventory). The paragraph at the top of page IV.B-19 is not clearly integrated into the discussion of the analytical methods and could be confusing to the reader.

RESPONSE 9.108

Comment noted. The following additional table has been incorporated into Section II, Additions and Corrections to the Draft EIR.

**Table IV.B-3.1
Global Warming Potentials for Greenhouse Gases**

Greenhouse Gas	Global Warming Potential
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	21
Nitrous Dioxide (N ₂ O)	310
Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs)	6,500
Sulfur Hexafluoride (SF ₆)	23,900
<i>Source: BAAQMD Source Inventory of Bay Area Greenhouse Gas Emissions. November 2006.</i>	

COMMENT 9.109

The methods that were used to determine construction emissions are discussed, but the actual emissions projections are not provided in either the text or the tables. These should be addressed.

RESPONSE 9.109

GHG emissions from construction activity were addressed on page IV.B-19 of the Draft EIR. Although the methodology was discussed, the quantity of GHG emissions was inadvertently omitted from the EIR section. The emissions were calculated and reported in the Air Quality Technical Appendix contained in Appendix B to the Draft EIR. The following sentence will be added to the Additions and Corrections Section of the Final EIR to include this statement within the Air Quality Section of the Draft EIR. “During the construction process, the proposed project would emit approximately 35,687 CO₂e.” See Appendix B, at page 40.

COMMENT 9.110

The mobile emissions inventory makes good use of traffic model data. The integration of project-specific trip rates enhances the internal consistency of the Draft EIR by providing a clear link between the climate change analysis and the traffic report. These trip rates also reflect the unique conditions associated with the project, which is an improvement in accuracy over the generic URBEMIS factors. We also recommend the use of weighted weekend/weekday trip rate to provide a more accurate picture of project impacts.

RESPONSE 9.110

This is a general comment with regard to the manner in which the Draft EIR utilized traffic model data in calculating mobile source emissions from project operations. No changes are required.

COMMENT 9.111

According to the text, natural gas consumption under the Proposed Project would be about 6 times as high as under existing conditions. However, according to the inventory table, natural gas emissions would be 600 times as high. There appears to be a calculation error. The calculations shown in the Appendix do not match the numbers in the text or tables. Correction of these data may result in a change in the significance conclusion in the DEIR.

The electricity numbers also appear to be slightly different from the calculations shown in the Appendix.

RESPONSE 9.111

This comment identifies an error that was made to the greenhouse gas emissions estimate. The estimate was incorrectly calculated based on 38,949 cubic feet per month as opposed to 3,894,900 cubic feet per month as noted in Table IV.J-11. The appropriate corrections will be noted in Section II, Additions and Corrections to this Final EIR. Because there are no adopted quantifiable thresholds for estimating greenhouse gas emissions, and the emission calculations were provided for information purposes only, this change does not affect any of the findings and conclusions of the Draft EIR.

COMMENT 9.112

The inventory does not include solid waste or water-related emissions. The OPR Technical Advisory states that the inventory should make a good-faith effort to supply water supply emissions. However, a qualitative discussion can substitute for quantitative numbers if these emissions cannot be calculated given available data.

RESPONSE 9.112

The Proposed Project incorporates a number of water conservation features into the proposed development that would result in a positive environmental impact in terms of reducing greenhouse gas emissions. For example, PDF B-2 promotes energy efficiency and conservation by requiring, in part, the utilization of reclaimed water sources for landscape irrigation purposes. In addition Mitigation Measures MM J.1-2 through MMJ.1-9 in Section IV.J.1 Water Conservation all require water conservation features to be incorporated into the Specific Plan that would ultimately reduce the project's water demands, thereby lowering greenhouse gas emissions that would otherwise be generated during the treatment and transport of potable water to the Project Site.

COMMENT 9.113

Page IV.B-31:

Citations from state agencies (such as CARB) should be added to substantiate the arguments made under the heading "Greenhouse Gas Emissions". Avoid words like "impossible" and "speculative"--in our experience, these terms invite challenge.

RESPONSE 9.113

Comment noted. The following footnoted reference will be added to the sixth sentence in the paragraph under the subheading "Greenhouse Gas Emissions" (See Section II, Additions and Corrections to the Draft EIR):

Page IV.B-32: added footnote: *"The California Air Pollution Control Officers Association, CEQA and Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act (CAPCOA) January 2008,* discusses three basic options air districts and lead agencies can pursue when contemplating the issues of CEQA thresholds for greenhouse gas emissions. While the CAPCOA guidance document does not promote any one of the methods it discusses, it notes that alternatively, the agency may believe it is premature or speculative to determine a clear level at which a threshold should be set.

COMMENT 9.114

Page IV.B-39:

The impact discussion does not consider the contribution of construction emissions to climate change impacts.

RESPONSE 9.114

The Draft EIR included a discussion of the project's construction related greenhouse gas emissions on page IV.B-19. For clarity this discussion should be relocated as amended to occur under the *Construction Phase Impacts* subheading beginning on page IV.B-32:

“Greenhouse Gas Construction Emissions

GHG emissions from construction activity were calculated using URBEMIS2007. The URBEMIS2007 model utilizes emissions factors obtained from the CARB OFFROAD2007 Model. The OFFROAD2007 model incorporates the CARBs most recent emission factors for heavy-duty construction equipment. During the construction process, the proposed project would emit approximately 35,687 CO₂e.”

COMMENT 9.115

The analysis assumes that the inventory overstates mobile emissions and that project features would reduce VMT. The trip generation factors in the traffic report may already incorporate some of the reductions in trips that are outlined here. Because the greenhouse gas emissions mobile inventory is based on the traffic report, the reductions may already be incorporated in the projected mobile emissions. The assumptions of the traffic report should be verified to avoid double counting of trip and emissions reductions.

RESPONSE 9.115

The trip generation methodology utilized in the traffic analysis is explained in Section IV.L-12, Traffic and Transportation. While trip reduction credits were applied to some of the project's land uses, the traffic study took a conservative approach in not applying aggressive reduction credits or applying credits in all areas that could be applied to. For example, as stated on page IV.L-12 of the Draft EIR, no reduction for public transit modes of travel was taken in the determination of the Proposed Project's vehicular trip generation forecasts and the corresponding traffic impacts to the surrounding street system. Therefore, the greenhouse gas discussion presented in Section IV.B Air Quality is correct to note that the greenhouse gas emission inventory is conservatively overstated.

COMMENT 9.116

Title 24 energy efficiency may already be assumed in the natural gas and electricity estimates in the Utilities section. The analysis should state whether this is the case. Again, it is important not to double-count emissions reductions.

RESPONSE 9.116

The natural gas and electricity estimates were based on standardized generation rates published in the SCAQMD CEQA Air Quality Handbook (1993). As Title 24 Energy Efficiency standards have been modified over the years to increase efficiency standards, such requirements are not reflected in the dated generation rates. At this time the SCAQMD is in the process of updating the CEQA Air Quality Handbook. No current estimates have been published to reflect the most recent 2007 California Building Code standards. As a result, the analysis in the Draft EIR represents a conservative estimate and the actual energy demands are anticipated to be lower than reported in the Draft EIR.

COMMENT 9.117

Mitigation measures that pertain to tree protection, water efficiency, energy efficiency, trip reductions, etc. from other sections of the Draft EIR can be referenced here.

RESPONSE 9.117

This comment suggests the Draft EIR should be reorganized. The commenter is correct in that many of the mitigation measures applicable to other sections would have a net beneficial impact in terms of reducing greenhouse gas emissions and could be restated here for clarity. Specifically, other mitigation measures that provide an indirect beneficial impact to reduce the effects of greenhouse gasses and global warming can be found in Sections IV.J, Public Utilities, IV.L, Traffic and Transportation. Mitigation Measures IV.J.1-1 through IV.J.1-10 provide for improved water efficiency standards and will reduce the energy demands associated with treating and conveying potable water to the project. All of the traffic mitigation measures listed in Section IV.L, Traffic and Transportation that provide for improved levels of service at impacted intersections would also serve to reduce emissions from motor vehicles that contribute to global warming. By reducing traffic congestion at roadway intersections, cars and trucks would experience improved fuel efficiency. This comment is noted for the record and will be forwarded to the decision makers for their consideration. However, this comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require any further response.

COMMENT 9.118

Climate Change Conclusions:

The analysis finds that there would be a less-than-significant impact because 1) there is a “lack of standards” and 2) the Proposed Project would be consistent with State and City goals and GHG reduction measures. This conclusion is vulnerable to challenge for the following reasons:

We don't necessarily disagree with the finding that the impact would be less than significant; however, we recommend relying too heavily on the vagaries and uncertainty of the current regulatory climate. The argument that there would be a less-than-significant environmental impact simply because there is no applicable legal threshold has been rejected repeatedly in CEQA case law, and the sources cited

throughout this document (CAPCOA, OPR) generally advise against using this line of reasoning. Environmental and physical phenomena occur regardless of whether there are regulations governing them.

The analysis does little to prove that the project would be consistent with State and City goals. Which goals are referred to here? AB 32? Local goals? How would the project be consistent?

As stated above, many of the measures that have been credited with reducing project emissions may already be incorporated in the emissions inventory numbers. The assumptions that were made in the traffic report and utilities data should be verified to ensure against double-counting. It is better to be conservative than to take too much credit for reductions.

The emissions reductions measures in the OPR technical advisory are not adopted policies. Thus, it is somewhat misleading to discuss the “consistency” of the project with these measures.

What are the other projects that could cumulate with the proposed project? They should be acknowledged and discussed (even if you refer generally to cumulative development in California or the City of Inglewood—however you choose to define your geographic scope). Be sure to state the conclusion in terms of a “less than cumulatively considerable contribution” to a significant cumulative impact.

RESPONSE 9.118

The commenter notes that while they do not necessarily disagree with the finding that the impact pertaining to greenhouse gas emissions would be less than significant; they recommend not relying too heavily on the vagaries and uncertainty of the current regulatory climate. With regard to the methodology employed in the GHG analysis, the Draft EIR does not rely on the lack of adopted thresholds or methodology to reach its conclusions. Rather, the analysis quantified the project’s contributions to greenhouse gas emissions and includes a qualitative discussion on the various project characteristics and project design features, and mitigation measures that would further reduce the project’s greenhouse gas emissions. Specifically, as stated on page IV.B-40, the analysis states that the Proposed Project would be a mixed-use, infill development project that is intended to minimize vehicle trips between residential and commercial uses. The analysis also notes that the Proposed Project incorporates “smart growth” features including creating walkable neighborhoods, providing housing near mass transit and jobs-rich area, and incorporating energy efficient appliances into the building design. Moreover, infill development reduces pressure to develop green fields such as open spaces and parkland by reclaiming under utilized sites. Infill development allows funds to be used for maintaining or upgrading existing services rather than diverting funds for expansion to new areas. Based on these characteristics and the implementation of other project design features and mitigation measures to promote water conservation efforts and increase energy efficiency (see PDF B-2 and Mitigation Measures IV.J.1-2 through IV.J.1-9 in Section IV.J.1 Water,), the projects contribution to greenhouse gas emissions were concluded to be less than significant.

With regard to the applicability of AB 32, the OPR Technical Advisory notes that AB 32 did not amend CEQA to require new analytic processes to account of the environmental impacts of GHG emissions from projects subject to CEQA.

With regard to the cumulative analysis, the geographic scope of the greenhouse gas emission analysis is global in nature and is not limited to a specific geographic region. The project's emissions were quantified on a project-specific level. As stated above, the analysis is based on a quantification of the project's contributions to greenhouse gas emissions and includes a qualitative discussion on the various project characteristics, project design features, and mitigation measures that would further reduce the project's greenhouse gas emissions. In determining whether the project's contribution to greenhouse gas emissions is "cumulatively considerable," the conclusions are based upon the project's consistency with applicable State goals pertaining to GHG reduction strategies.

COMMENT 9.119

A couple of additional/alternative arguments that could be applied:

- o It may be helpful to discuss the project's significance in context of statewide emissions reductions strategies. CARB's recently released Draft Scoping Report proposes to achieve most of the emissions reductions necessary to achieve the AB 32 target by increasing fuel efficiencies, developing renewable power, and through other means. A relatively small portion of the emissions reductions strategies would apply directly to individual development projects. The section should recognize that even though AB 32 calls for a large reduction in emissions, it does not call for a moratorium on growth.
- o The largest source of emissions for this project would be mobile emissions. However, the project would be far more accessible than a project sited outside of an urban area without access to public transportation. It could be argued that the siting of the project contributes to greater efficiency (lower vehicular fuel use) than a comparable project sited somewhere else. It may be easier to demonstrate a less-than-significant impact if you consider the project within the context of a larger geographic scope.
- o To demonstrate that the project would do everything possible to reduce its contribution to climate change, you can require additional mitigation. A few cost-effective examples that we have generally found to be acceptable to developers include energy system commissioning; use of recycled, rapidly renewable, reclaimed and/or certified construction materials; water-efficient appliances; green cement; Energy Star roofs; and passive solar features.

RESPONSE 9.119

The suggestions provided above are noted for the record and will be forwarded to the decision makers for their consideration. However it should be noted that the EIR addresses each of these issues. An overview of AB 32 is provided on page IV.B-39 of the Draft EIR. The commenter is correct in noting that AB 32 does not call for a moratorium on growth.

With regard to the projects effect on reducing VMT's the reader is referred to the discussion on page IV.B-40. Specifically the Draft EIR states that:

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

With regard to the project's project design features and mitigation measures that would contribute to a reduction in greenhouse gas emissions, please see PDF.B-2 on pages II-25 and IV.B-34, and mitigation measures IV.J.1-2 through IV.J.1-9 beginning on page IV.J-29 of the Draft EIR.

COMMENT 9.120

Alternatives

Solid waste generation factors are not consistently utilized throughout the Alternatives discussions. For example, Alt RU 800 uses a construction debris factor of 4.48 lbs/sf, while all other Alternatives use a construction debris factor of 4.38 lbs/sf.

RESPONSE 9.120

Comment noted. After reviewing the Alternatives Analysis for this discrepancy it appears that the reference to “4.48 lbs. per sf “on page VI.C-13 is a typographical error. The calculation, however, was correctly based on 4.38 lbs. per sf yielding a generation of approximately 2,628 tons of solid waste construction debris. This correction will be noted in the Additions and Corrections Section of the Final EIR.

COMMENT 9.121

It is unclear what the existing amount of solid waste generated at the project site is. Page VI.B.1-7 states that existing uses generate approximately 906 tons per year; however, Table VI.C-7 (Estimated Operational Solid Waste Generation-Alternative RU 800) states that existing uses generate approximately 5,169 pounds per day. Extrapolating this information, one could assume that existing uses generate approximately 1,886,685 pounds per year which would equate to approximately 943 tons per year (assuming 1 ton=2,000 pounds). This apparent discrepancy should be reconciled.

RESPONSE 9.121

The calculation presented in Table IV.J-17 underestimated the amount of solid waste generated by existing land uses. The calculation presented in Table IV.J-17 is only based on the 280,000 sf of Casino/Pavilion floor area that is proposed to be demolished. The total amount of floor area in the Casino/Pavilion that is currently in use and generating solid waste is estimated at 321,000 sf. as correctly calculated in Table VI.C-7. This correction will be noted in the Additions and Corrections Section of the Draft EIR. It should be noted that this correction results in a decrease in the project's net solid waste calculation and, as a result of this correction the projects impact upon solid waste would be reduced. As such no new significant impacts would occur.

COMMENT 9.122

Given the potential value of the project site as a cultural/historic resource (see above comments), a Historic Preservation alternative should be analyzed. Not including this alternative in the DEIR in view of the potential for a significant cultural/historic resources impact, as noted above, would render the DEIR inadequate.

RESPONSE 9.122

The Draft EIR studied a historic preservation alternative. Alternative RU 800 in Section VI. C. of the Draft EIR analyzes a possible scenario for future development to allow for a reduced development scenario that would potentially reduce the project's environmental impact while achieving some, but not all of the project objectives. Specifically, Alternative RU 800 would result in the development of approximately 800 dwelling units on the Hollywood Park Racetrack site. This Alternative would retain the Racetrack and Grandstand, and would include the removal and discontinuation of the casino. The existing barns would be relocated to the infield area of the Main Track and the practice track would be removed. To accommodate residential development, the surface parking areas would be reduced. In addition, the No Project Alternative—Continuation of Existing Land Uses, analyzed the impacts of continuing racing, and retention of the Racetrack and Grandstand. Please refer to Section VI.B.1 of the Draft EIR.

It should also be noted that the Project Site was not found to be a cultural/historic resource under CEQA. Please refer to Section IV.E of the Draft EIR and the additional analysis of the Project Site as a potentially historic district in Response 9.13.

COMMENT LETTER No. 10

Dr. Joel Kirschenstein
Sage Institute Inc.,
District Consultant for Inglewood Unified School District

2801 Townsgate Road, Suite 213
Westlake Village, CA 91361
Dated 11/24/08
Received 11/24/08

COMMENT 10.1

Project Location: The 238-acre Hollywood Park Redevelopment Project Site (Project Site) is located on the Hollywood Park property at 1050 South Prairie Avenue in the City of Inglewood. The project Site is bounded on the north by a parking lot (vacant commercial/recreational property), the recent Renaissance residential development to the northeast and Darby Park to the East. One-story and two-story residential structures are located across Pincay Drive to the north. A commercial shopping center and one and two-story residential uses are located to the east. Century Boulevard is located south of the Project Site and is developed with one and two-story commercial retail and restaurant uses are located immediately west of the Project Site across Prairie Avenue.

There are no existing Inglewood Unified School District (IUSD) school sites within the project location.

Brief Description of Project: The proposed Hollywood Park Redevelopment Project (Project) consists of the redevelopment of the approximately 238-acre Project Site, including Racetrack Grandstand, the Pavilion/Casino and the construction of a new mixed-use development. The Project included demolition of most of the improvements and structures on the Project Site, including the Hollywood Park Racetrack and Grandstand, and the new construction of approximately of 2,995 residential dwelling units, 620,000 square feet of retail space, 75,000 square feet of office/commercial space, a 300-room hotel including 20,000 square feet of related meeting space, and 10,000 square feet of community-serving uses for the Home Owners Association (HOA). The residential product types may include single-family, townhomes, stacked flats, and condominium buildings. At least 90 percent of the residential development will be a for-sale (i.e. ownership) residential product.

A 4-acre school site has been proposed within the Project Site along with a school district request for an additional 2-acres adjacent to the proposed new school site.

Discretionary approvals anticipated for the proposed development would include but are not limited to certification of the EIR, approval of a General Plan Amendment, approval of a Redevelopment Plan Amendment, Zone Change, adoption of Specific Plan, approval of a Tentative Tract Map(s) and Final Map(s), approval of Developmental Agreement between the developer and the City of Inglewood, approval of an owner participation agreement (OPA) between developer and the Redevelopment Agency of the City of Inglewood regarding financing of public improvements and consistency with the applicable Redevelopment Plan, and approval of a Community Facilities District. Additional discretionary actions and approval for various aspects of the proposed project may be required.

Project Applicant: Hollywood Park Land Company

c/o Wilson Meany Sullivan
100 Wilshire Boulevard, STE 940
Santa Monica, CA 90401

RESPONSE 10.1

This comment includes a summarized statement of the project description and identifies the Project Applicant as presented in the Draft EIR. The comment also notes that the school district is requesting an additional 2-acres adjacent to the proposed new school site. No response is warranted.

COMMENT 10.2

Inglewood Unified School District Response: to Draft Environmental Impact Report (DEIR):

The IUSD has reviewed the DEIR in general and section K. Public Services, 3. School Services in particular. The following serves as the IUSD response to the aforementioned section in the project DEIR:

Although the DEIR refers to the IUSD enrollment declines as related to current IUSD enrollments and capacities of “IUSD closest Schools Capacity and Enrollments (School Year 2007/2008)” and the reported “excess” the DEIR does not consider the fact that all IUSD schools with the exception of Inglewood High School are classified as Critically Overcrowded Schools (COS) by the California Department of Education (CDE) (attached).

The CDE COS school designation indicates that the acreage of school site is undersized as related to individual school site enrollments. Therefore, the DEIR designation of “excess” is relative to the IUSD Master Planning process to reduce the capacity of school sites in order to reduce the CDE COS designation.

It should also be noted that due to educational program implications all seats at individual school sites can not be occupied at all times due to the use of classrooms for class size reduction, special labs, resource rooms, etc...

The IUSD is also in the process of evaluating the removal of obsolete relocatables which will further reduce the on line capacity for IUSD school sites. The IUSD implemented the use of relocatables in the past when the IUSD implemented Multi Track Year Round Education (MTYRE), which has been eliminated with recent enrollment reductions.

In addition, the IUSD has allowed relocatable capacity to exist on many campuses during the Measure K (local G.O. bond) Reconstruction Projects in order to house overflow students during construction.

RESPONSE 10.2

The commenter is correct in distinguishing overcrowding schools (based on school site acreage) versus capacity and enrollment (based on student capacity/enrollment data). The Critically Overcrowding Schools designation is used for purposes of obtaining Overcrowding Relief Grants from the state. To be eligible for an Overcrowding Relief Grant, a school site must have a pupil population density equal to or greater than 175% of the California Department of Education's (CDE) recommended pupil population density. While IUSD schools may be classified as Critically Overcrowded Schools based on the number of students per site acreage (density), the data represented in Table IV.K-5 is technically accurate enrollment data received from Inglewood USD because it represents the number of students actually enrolled as compared to the enrollment capacity. The table correctly notes the excess or shortage of school seats that are based on school capacity—not the density of the school site. Thus, no additions or corrections to the Draft EIR are warranted.

COMMENT 10.3

Regarding Table IV.K-6, Pupil Per Home ratios, the IUSD considers the use of LAUSD Yield Rate Studies as a comparable only. Therefore, the IUSD proposes:

- a) The State Wide Yield Rates as an additional comparable

RESPONSE 10.3

Student Yield Rates (SYR) are the basis for determining impacts on schools from new development and are defined as the number of students generated from each new residential unit. Statewide Student Generation or SYR are not an accurate tool for determining the generation of students from housing in new communities because the state has been using a general rate of 0.7 per unit for many years (more than 10 years) without updating the rates, addressing the dwelling unit product types (i.e. single-family detached, single-family attached and apartments) or differences in student generation patterns due to location of the project (urban, suburban or rural) or age of housing. This rate may not be representative of the new, in-fill urban development within the Project. The state uses the statewide SGR for the purposes of determining eligibility for New Construction funding.

Alternatively, the state established a methodology to be used by districts to predict students from new development in Government Code 65995. These SYR are documented in a School Facility Needs Analysis (SFNA) prepared and updated annually by school districts that charge Level II and III fees. This methodology is required for any district that charges developers Level II and Level III fees to address impacts of new housing. The Government Code Section 65995.6 (a) requires that:

“The school facilities needs analysis shall project the number of unhoused elementary, middle, and high school pupils generated by new residential units, in each category of pupils enrolled in the district. This projection of unhoused pupils shall be based on the historical student generation rates of new residential units constructed during the previous five years that are of a

similar type of unit to those anticipated to be constructed either in the school district or the city or county in which the school district is located, and relevant planning agency information, such as multiphased development projects, that may modify the historical figures. For purposes of this paragraph, "type" means a single family detached, single family attached, or multifamily unit.

If no new development or if no new development of a specific product type took place within the district boundaries, it is permissible to go outside of the boundaries to look for comparable rates. On this basis, the Draft EIR obtained SYR from the Developer Fee Justification Study completed by Los Angeles Unified School District in February 2008 since there were types of units recently constructed in the Los Angeles Unified School District that are similar to the types of units proposed to be constructed on the Project Site. The study was based on a large sample of 23,395 units constructed in the last five years. These rates were appropriate for estimating impacts from the Hollywood Park project because they are provided in similar three dwelling unit product categories planned for in the Project: single family detached, single family attached (condominiums, townhomes) and multi family (apartments). Additionally, the Los Angeles Unified School District's jurisdiction includes urban areas similar to IUSD. The rates were transmitted to Inglewood USD.

The 2008 IUSD SFNA alters the use of the SYR provided to IUSD. The SYR for single-family detached homes is applied to both single family detached and single family attached products, which is not allowed by Government Code 65995.6. This significantly overstates student impacts from the Hollywood Park and consequently is not an accurate assessment of the student population generated by the Project.

COMMENT 10.4

Operational Impacts

Again the IUSD considers the data set forth on Table IV.K-7 as a projection only.

RESPONSE 10.4

As correctly noted by the commenter, Table IV. K-7 is an estimate on student generation from the Proposed Project. The Proposed Project is anticipated to yield approximately 574 K-12 students, including 279 elementary school students, 137 middle school students, and 159 high school students based on an SYR derived from a sample of 23,395 units constructed in the last five years in adjacent Los Angeles Unified School District with similar product types and characteristics as proposed in Hollywood Park. (See Response 10.3 for discussion on generation rates used to project student population for Hollywood Park.)

COMMENT 10.5**Existing Schools**

Although the calculation of “Capacity vs. Enrollments” is presented for existing IUSD school within proximity of the proposed project, there is no analysis of CDE requirements for adequate school acreage nor mention of the CDE identification of IUSD COS’s.

RESPONSE 10.5

The California Department of Education (CDE) is responsible for school site review and approval. To aid districts in school site selection and program design, CDE produces guidelines for school site sizing documented in the Guide to School Site Analysis and Development (2000). These guidelines are meant to ensure adequate academic and physical education standards for California students, while school facilities are provided efficiently. According to the CDE guidelines, a school site of approximately 5.8 acres would be recommended for a new schools serving 279 students. In practice, CDE works closely with school district to make available sites of various sizes fit student needs and district budgets. CDE approves sites that are between 50% and 100% of the recommended guidelines. The civic site within the Project that could accommodate a school represents a site size of approximately 69% of the recommended guidelines for 279 students. The closer to 50% of the recommended site size a proposed school site is, the closer CDE will look at details like the site shape and plan for buildings, as well as educational programs with emphasis on physical education. If a site is smaller than 50% of the recommended CDE guidelines, it will be considered a “small school site” and will have to follow the CDE “small school site” guidelines in order to be approved. Although CDE's discretionary approval of such sites is determined by specific circumstances on a case-by-case basis, small school sites continue to be approved.

Based upon the enrollments at surrounding elementary schools that could potentially serve the Project and the site constraints at those facilities, three out of four adjacent elementary schools have been deemed critically overcrowded under CDE COS. If school enrollment density is higher than 115 students per acre at the elementary level and 90 at the secondary level, the school district qualifies for state funds from a special reserve aimed at relieving overcrowding at existing schools. The following densities are found on elementary school sites nearest to the project.

SCHOOL	CERTIFIED USABLE ACRES	SY 2007 ENROLLMENT	SCHOOL SITE DENSITY (2007 ENROLLMENT)	SY 2001 ENROLLMENT	SCHOOL SITE DENSITY (COS PROGRAM)
Freeman (Daniel) Elementary	3.40	346	101.76 students/ac	473	139.12 students/ac
Kelso (William H.) Elementary	3.48	778	223.56 students/ac	850	244.25 students/ac
Lane (Warren Elementary)(K-8)	8.69	604	69.51 students/ac	773	88.95 students/ac
Woodworth (Clyde) Elementary	6.84	625	91.37 students/ac	1,053	153.95 students/ac
<i>Sources:</i>					
1. <i>Acreage. Inglewood Unified School District. Provided by Sage Institute, Inc. via e-mail. November 2008.</i>					
2. <i>Enrollment data (2001, 2008). California Basic Education Data System. California Department of Education.</i>					
3. <i>Critically Overcrowded School Program. California Department of Education Certification of Acres per Education Code 17078.18.</i>					

As noted on Page IV. K-25 of the Draft EIR, district-wide student enrollment at IUSD has declined by 14.8% in the last five years. Elementary school enrollment has declined by 18.5%. Middle and high school enrollments have declined by 16.4% and 3.5%, respectively. Since the designation of COS is based on enrollment as of school year 2001 and site acreage, with a continuing declining enrollment it is unclear whether IUSD would be eligible for COS designation in the future. Additionally, the proposed 4-acre school site would have to exceed a capacity of 460 seats in order to be deemed as a COS site. It is not anticipated that the 4-acre site could house more than 460 students if this site were developed as a school.

COMMENT 10.6

New Schools

The IUSD and applicant have identified a 4-acre site with provisions for IUSD to acquire an additional 2-acres adjacent to the 4-acre site if required to house elementary of other project area students. It is the intent of IUSD to enter into a School Mitigation Agreement with the project applicant for land and fees to adequately house elementary students or other such configuration in order to mitigate impacts on IUSD. Applicant has been in discussion with IUSD about participation in the Career Tech program at existing school sites that would serve the project.

Project Design Feature

The potential need for an additional 2-acre site adjacent to the proposed 4-acre site needs to be incorporated to this section.

RESPONSE 10.6

The Proposed Project includes a 4-acre civic site that could be used for a school. The acquisition of an additional 2-acres of residential land to house elementary school students would need to be part of any School Mitigation Agreement between the Project Applicant and IUSD. The Hollywood Park Specific Plan land use table allows for a school to be built on residential land. At this time, since no Mitigation

Agreement is in place, there is no need for an additional project design feature. Furthermore, in the event that a Mitigation Agreement is not reached, pursuant to Government Code Section 65995, the DEIR has an appropriate mitigation measure (MM K 3-2, Page IV.K-42 of Draft EIR) to pay the Developer Fees at the time building permits are issued. Payment of the adopted fees would provide full and complete mitigation of school impacts as established by Government Code (See Govt. Code Section 65995).

COMMENT 10.7

Mitigation Measures

IUSD recommends that the City specifically evaluate the streets surrounding the proposed project school site ingress and egress set back standards, curb and sidewalk criteria, transportation turn out lanes, appropriate street traffic control and parking signage adjacent to the proposed school site.

RESPONSE 10.7

As part of the Draft EIR, site ingress and egress, transportation turn out lanes, street circulation, appropriate street traffic control and parking were studied for the entire site, including the proposed civic site, which could accommodate a school (in Section IV. L. Traffic/Transportation, and Section IV.M. Parking of the Draft EIR).

As part of the Hollywood Park Specific Plan, Section 2.5 provides the Public Street Circulation Plan for the project, including non-vehicular circulation and vehicular circulation. Street sections are noted for all streets within the Project Site, including adjacent to the proposed civic site. Street sections include travel lane widths, turn out lane widths, sidewalk, and parkway widths. On Prairie Avenue adjacent to the proposed civic site, there is 108' right-of-way, 88' curb-to-curb dimensions. Prairie Avenue, adjacent to proposed civic site, will have three through lanes in each direction, a 12' required left turn lane into Arbor Vitae, and a 12' right turn lane into Arbor Vitae (see Page 2-12 of Hollywood Park Specific Plan, Exhibits 2-5 and 2-6). On Arbor Vitae at Prairie Avenue, adjacent to proposed civic site, there is 83' right-of-way, 57' curb-to-curb dimensions. This street provides two travel lanes in both directions and includes a center turn lane that would be used for a left turn into Prairie Avenue. This street does not provide any on-street parking at the entry portal. Six feet of parkway is on the northern side of the street within the Hollywood Park Specific Plan area. Interior streets have 66' right-of-way and 40' curb-to-curb dimensions. These streets consist of one travel lane in each direction and on-street parallel parking. The Traffic Impact Study (Appendix G-1 of the Draft EIR) indicates the streets are adequate to accommodate a school.

Section 2.6 of the Specific Plan (Page 2-24) reviews the setback requirements of the Proposed Project, including the proposed civic site. For the proposed civic site, the setback requirements are 25' on the Arbor Vitae entrance to the site, 10' on the interior streets, and 30' on Prairie Avenue.

Parking standards are noted in Section 2.11 of the Hollywood Park Specific Plan. For the proposed civic site, the parking standards follow Article 19 of the Inglewood Municipal Code. Under the Inglewood

Municipal Code Section 12-46(2)(a), the aggregate amount of off-street parking provided in connection with an elementary school is two parking spaces plus either 1.5 parking spaces per classroom, or one parking space for each 400 square feet of total floor area in classrooms, assembly rooms or other instructional facilities, whichever is greater. Please refer to Response 5.22 for further details regarding the parking requirements for an elementary school.

Since the use of the civic site has not yet been determined by the City, it is premature to undertake site specific analysis of the signage and improvements associated with a possible school. Site specific impacts should be analyzed once the use for the civic site is fixed.

COMMENT 10.8

Construction

In the event a mitigation agreement is not concluded for on site mitigation, transportation to off project school site areas will have to be evaluated e.g.: air, noise, and related impacts to potential existing off site elementary schools or K-8 locations in general which could serve the project area.

RESPONSE 10.8

The commenter refers to a potential scenario in which the proposed civic use component of the project will not be developed as an elementary school and therefore students generated from the proposed residential component of the project will attend other schools in the area. Traffic volume forecasts for the proposed residential component were developed based on the Institute of Transportation Engineers' (ITE) Trip Generation publication. It is important to note that the published ITE trip generation data is collected based on driveway traffic counts conducted at the surveyed sites (essentially a documentation of vehicles entering and exiting the survey site access points). As a result, the ITE residential traffic generation already accounts for traffic associated with typical daily, morning and afternoon peak hour of school related use. For example, during the weekday morning peak hour, those trips associated with parents driving their children to schools are already reflected in the ITE residential trip generation rates since these trips are included in the surveyed driveway counts. The overall Hollywood Park project trip generation and traffic analysis assumed an elementary school use on-site. However, in the project residential traffic generation and assignment, the analysis conservatively did not reduce any potential school related trips at any of the off-site study intersections. Therefore, those trips generated from the project's residential component to "off-site" area schools are reflected in the trip generation and traffic impact analysis.

In the event that the proposed civic use component of the project does not developed into an elementary school, other elementary school sites nearest to the project include Freeman Elementary, Kelso Elementary, Lane Elementary, and Woodworth Elementary. The traffic impact analysis includes study intersections either immediately adjacent to or are in close proximity of these schools, as follows:

Int. No. 27: Prairie Avenue/Kelso Street-Pincay Drive

Int. No. 44: Crenshaw Boulevard/8th Avenue

Int. No. 46: Crenshaw Boulevard/Pincay Drive-90th Street

Int. No. 64: Crenshaw Boulevard/104th Street

As stated above, since the traffic generation and analysis already reflects school related traffic generated by the proposed residential project component at the off-site study intersections, additional review or analysis is not required. Since the impacts of the Project on air quality and noise analyzed in Sections IV. B and G of the Draft EIR, respectively, are based upon the Traffic Impact Study, these intersections where additional schools are located have been included in the original analysis.

COMMENT 10.9

Finally, CDE site approval shall also require adherence to CDE requirements for compliance regarding proximity to air corridor locations and related adequate noise and sound Mitigation.

RESPONSE 10.9

As noted by commenter, if the City determines to use the civic site for a school, and IUSD decides to process a CDE application for a new school on the proposed civic site, CDE requirements for school site compliance shall be adhered to and the property location shall be disclosed to CDE with all pertinent information. Ultimately, CDE will decide whether the site meets the criteria required for school placement.

COMMENT 10.10

The proposed project school site will have to be in compliance with seismic protocols, pipeline risk analysis, hydrology and compatible runoff requirements. Therefore IUSD school site studies will utilize applicant special studies and resource documents for IUSD school site approvals.

RESPONSE 10.10

As noted by commenter, if the City determines to use the civic site for a school, and IUSD decides to process a CDE application for a new school on the proposed civic site, IUSD can utilize the Project's special studies and resource documents to seek CDE approvals.

COMMENT 10.11

Upon the IUSD entering into a Mitigation Agreement with applicant, K-12 mitigation will have been deemed adequately addressed. In particular the proposed school mitigation agreement between IUSD/Developer secures a K-6 elementary or related school site use within the project to mitigate students generated from within the project area.

cc. Dr. Kenneth Crow, IUSD Administrator in Charge

Ms. Jeanette C. Justus, Project Consultant

w/CDE/COS Attachment

RESPONSE 10.11

Comment noted. However, it should also be noted that entering into a Mitigation Agreement is not the sole method for mitigating the Project's impact to schools. Pursuant to Government Code Section 65995:

(h) The payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995 and, if applicable, any amounts specified in Section 65995.5 or 65995.7 are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities.

As noted on Mitigation Measure MM K 3-2, the Project Applicant shall pay the developer fees at the time building permits are issued; payment of the adopted school fees would provide full and complete mitigation of school impacts. Alternatively, the Project Applicant may enter into a school mitigation agreement with IUSD to address mitigation to school impacts in lieu of payment of developer fees. The mitigation agreement shall be mutually satisfying and shall establish financing mechanisms for funding facilities to serve the students from the Proposed Project. If the Project Applicant and IUSD do not reach a mutually satisfying agreement, then project impacts would be subject to the developer fees and payment of the fees shall constitute full and complete mitigation of Project's impacts on schools.

COMMENT LETTER No. 11

Steven Bradford
Region Manager
Southern California Edison Company
Dated November 24, 2008

Received November 24, 2008

COMMENT 11.1

Dear Mr. Curry:

Southern California Edison (SCE) appreciates the opportunity to provide comment on the City of Inglewood Hollywood Park Redevelopment Project DEIR. The 238-acre project site is located on the Hollywood Park property at 1050 South Prairie Avenue in the City of Inglewood. The proposed project consists of the redevelopment of the Racetrack Grandstand and the Pavilion/Casino and the construction of a new mixed-use development.

The project will demolish most of the improvements and structures on the project site, including the Hollywood Park Racetrack and grandstand, and will construct approximately of 2,995 residential dwelling units, 620,000 square feet of retail space, 75,000 square feet of office/commercial space, a 300-room hotel including 20,000 square feet of related meeting space, and 10,000 square feet of community-serving uses for the Home Owners Association (HOA). The Pavilion/Casino will be renovated and reconfigured as a maximum 120,000 square feet casino/gambling facility. Approximately 25 acres will be designated for recreation/open space for the development, including 2.5 acres developed as an HOA Recreational Facility.

RESPONSE 11.1

This comment includes a summarized statement of the project description as presented in the Draft EIR. No response is warranted.

COMMENT 11.2

The DEIR lists the City of Inglewood's projected load schedule for the new project and a survey made of the SCE distribution infrastructure in the area, and it arrives at a conclusion that SCE transmission and distribution facilities in the area are adequate to meet the demands of the proposed project.

RESPONSE 11.2

This comment includes a summarized statement of the information presented in the Draft EIR regarding the SCE distribution infrastructure in the area of the Project. No response is warranted.

COMMENT 11.3

SCE's Field Engineering has preliminarily reviewed the DEIR for the Hollywood Park Redevelopment Project. Based on information given by the DEIR, SCE Field Engineering estimates the total demand for the project to be approximately 6 to 10 megavolt amperes (MVA); this 6 to 10 MVA represents and

incremental demand of approximately 1 to 4 MVA. The Ryan 16 kilovolt (kV), Boeing 16 kV, Republic 16kV, McDonnell 16kV distribution lines out of SCE's 66/16 kV Lennox Substation; and the Adak 16kV and Hawthorne 16kV out of SCE's Yukon 66/16 kV Substation, are the distribution circuits currently serving the project site and the immediate surrounding area.

RESPONSE 11.3

Since the preliminary analysis, SCE Field Engineering has indicated that it made more accurate load growth and forecasting assessment, as included in the February 10, 2009 letter to City of Inglewood, as a follow-up to the original SCE letter dated, November 24, 2008. SCE estimates the total demand of the project to be approximately 17 to 19 MVA, with the first phases of load beginning in 2011.

COMMENT 11.4

Lennox substation, which is immediately adjacent to the project site, will most likely serve the bulk of the project's electrical demand. SCE's latest forecast indicates Lennox substation will require additional capacity in the year 2014 in order to serve the project if Lennox Substation cannot be relieved by other substations. To summarize, based upon information derived from the DEIR, Field Engineering preliminarily forecasts Lennox substation may require capacity addition in the year 2014 in order to accommodate the Hollywood Park Redevelopment Project.

RESPONSE 11.4

Based on the new assessment, SCE Field Engineering forecasts that Lennox Substation may require capacity additions in the year 2012 to accommodate the Hollywood Park project.

COMMENT 11.5

Please contact Nichols Duong, P.E., Senior Field Engineer at (310) 608-5104 to initiate the process for a more complete and formal review of electric service requirements to serve the project. In addition, I would be happy to arrange a meeting between appropriate SCE personnel (SCE's Account Executive, SCE Field Engineering representatives, and Transmission representatives, etc) to discuss SCE's concerns and to obtain a greater understanding of the proposed project.

RESPONSE 11.5

This comment includes the contact information of a senior field engineering at SCE for further information. The Project Applicant contacted Mr. Steven Bradford, Regional Manager at Southern California Edison regarding this project.

COMMENT 11.6

Please note, it is important the DEIR for this project discuss "the whole of an action", as required in

CEQA Guidelines Section 15378. If it is determined that additional infrastructure is necessary to serve the project, a project description of the new/upgraded facilities, and analysis of any environmental impacts associated with those facilities, should be included in the scope of the DEIR for this project. If this cannot be accomplished within the desired schedule for certification of the EIR, an addendum or supplement to this EIR may be required at a later date.

Also, please be advised, when development plans result in the need to build new, or relocate existing, SCE electrical facilities that operate at or above 50 kV, the SCE construction may have environmental consequences subject to CEQA and review by the California Public Utilities Commission (CPUC). If the SCE facilities are not adequately addressed in the local agency CEQA review for the larger development project, and CPUC review of the relocated or new electric facilities is required, the CPUC permit process and separate CEQA review could delay approval of the SCE power line portion of the project for up to two years or longer. If, however, the SCE facilities are addressed in the CEQA review for the larger development process, SCE may be able to construct or relocate its related facilities exempt from the CPUC permit requirements under Exemption F of CPUC General Order 131-D.

RESPONSE 11.6

As stated in the follow-up letter dated, February 10, 2009, the capacity addition, if required, at Lennox Substation can be done within the existing substation property and will not involve the construction of any new 66kV subtransmission lines. Because the facilities anticipated will not result in a substation expansion beyond the SCE-owned property, SCE would not be subject to the CPUC's Permit to Construct (PTC) requirements under the General Order 131-D to accommodate the bank addition. Therefore, no additional electric infrastructure project description needs to be included in the scope of the DEIR.

COMMENT 11.7

Once again, we thank you for the opportunity to comment on the DEIR for this project and request a copy of the certified Final EIR in CD format upon its completion. If you have any questions regarding this letter, please do not hesitate to contact me at (310) 783-9341.

Sincerely,

Steven Bradford
Region Manager
Southern California Edison Company

RESPONSE 11.7

Comment noted. As requested, SCE will be placed on the mailing list for distribution of the Final EIR.

COMMENT LETTER No. 12

Robert Dwelle
Real Estate Director
Habitat for Humanity Greater Los Angeles
17700 S. Figueroa Street
Gardena, CA 90248
Dated 11/12/2008

COMMENT 12.1

Dear Mr. Curry:

Subject: Hollywood Park EIR

On behalf of Habitat for Humanity of Greater Los Angeles, we feel strongly that there should be an affordable housing component that is a required part of this project. Even if just 10% of the units were set-aside as affordable, this would add 300 units of permanently affordable housing to the community; and would make the dream of homeownership a reality for many in the community who will likely not be able to afford the price of the market rate homes.

We feel this need is equal to providing the open space or recreation space. Even if the developer just offered the land for the development. We have found that quality stable housing is extremely helpful for child development, and for creating a foundation that leads to greater household prosperity.

300 units of quality affordable housing would help a large number of Inglewood families throughout the many years of this development, and if this was a development requirement it would not cost the City anything.

Sincerely,

Robert Dwelle

RESPONSE 12.1

This comment expresses support for affordable housing to be incorporated into the project. It should be noted that the project will contribute to the ability of the redevelopment agency to provide for the 15% affordable housing goals through tax increment financing and the state mandated 20% affordable set-aside funding requirement for redevelopment project areas. (see Pages IV.H-23 through IV.H-25 in Section IV.H, Population and Housing of the Draft EIR for further discussion).

In addition, the Maximum Housing Project Alternative discussed in Section VI.F of the Draft EIR was selected as a possible scenario for future development to incorporate the creation of both on-site and off-

site affordable housing into the overall project, and to maximize the development of overall housing. As noted in that analysis, while the Project, as proposed, indirectly funds the creation of affordable housing by generating additional tax increment for the Redevelopment Agency to increase and improve the supply of affordable housing for persons and families of very low and moderate income, under the Maximum Housing Alternative the developer would be involved in creating affordable dwelling units as part of the project.

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

COMMENT LETTER No. 13

Dr. Jan Brown
9312 10th Avenue
Inglewood, CA 90305
(310) 671-1734
Dated 10/9/2008
Received 10/14/2008

COMMENT 13.1

Note:

There are not 1,000 off site parking spaces in the community, this must be revised.

Do not make the same mistake as Renaissance again where residents are parking up and down Pincay Ave.

An Inglewood city employee in one of the related discussions pointed out at the last meeting w/ statistics and current information that there is not sufficient off site parking.

It is essential that you revise this section immediately. It will not be ignored.

Thank you!

Dr. Jan Brown
9312 10th Ave
Inglewood, 90305
(310) 671-1734

RESPONSE 13.1

This comment is noted for the record and will be forwarded to the decision makers for their consideration.

However, it should be noted that the Proposed Project does not propose any off-site parking. All of the project's parking demand will be met on the Hollywood Park site within structured parking areas, on individual residential lots, in guest parking lots, and on streets internal to the proposed development. Please refer to Response 6.1 and Response 6.2 for further clarification of the parking standards for the Proposed Project.

COMMENT LETTER No. 14

Helen Wilton
618 East Buckthorn St.
Inglewood, CA 90301
310-673-0869
Dated 11/19/2008
Received 11/24/2008

COMMENT 14.1

Regarding EIR Concerning Hollywood Park

1. As a 50 year neighbor across from Hollywood Park, I have spent many beautiful days of racing there. I am very saddened that the last beauty spot in the city will be destroyed - along with the revenue and prestige it brought to the City. This lovely park is known all over the world, and horses from many countries race here. Could we not help the park in every possible way to keep it going, even to other countries sharing in it as one solution.

RESPONSE 14.1

This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any challenge or objection pertaining to the environmental analysis.

While the comment notes that the racetrack once brought revenue and prestige to the City, as discussed in the Draft EIR on Page IV. H-13, “[h]orseracing in California is a declining business industry largely due to increased competition for the publics’ recreation and entertainment dollars.” Because Indian gaming in California has increased and purses in other states have also increased, horse racing in California may not be economically viable. Please refer to Table IV.H-3 on Page IV.H-14 for further evidence showing the decline in the economic viability of live horse racing at Hollywood Park as shown in simulcast meet handle and attendance data from 2002-2006 when no live racing was in session.

The commenter should also note that in response to the public comments received from community outreach efforts during the land use planning phase of the Project, the centerpiece for the new

development is Lake Park, which incorporates the concept of the infield lakes and gardens of the existing racetrack into an expansive public open space, highlighted by a dramatic waterfall.

COMMENT 14.2

2. Air quality suffers from plane exhaust – and plane noise is a constant – with much bigger planes coming in the near future.

RESPONSE 14.2

This comment is noted for the record and will be forwarded to the decision makers for their consideration. With respect to the effects of plane exhaust on air quality conditions, such plane exhaust is captured in the ambient air quality conditions against which impacts of the Project were measured. The Draft EIR discloses that even with the incorporation of feasible mitigation measures, the Project would nonetheless result in a significant and unavoidable impact to air quality during construction and operation of the Project. However, it should be noted that most large projects within the Southern California area generally have Air Quality impacts that are above the SCAQMD thresholds and generate a significant and unavoidable impact. The SCAQMD thresholds used for the analysis were generated in 1993 and are stringent to keep the Southern California region within watchful limits for ozone and particulate matter emissions.

With respect to impacts from airplane noise, the Project proposes to implement Mitigation Measure MM I-1 on Page IV.I-36 of the Draft EIR. This mitigation measure requires that residential uses of the Project to be developed in a manner that achieves a 45 dBA interior noise level. A qualified noise consultant shall complete an exterior and interior noise analysis during the building permit stage to ensure that a 45 dBA interior noise level is met. While the Project Applicant cannot control the size or noise of planes flying overhead, the Project Applicant has proposed mitigation measures to minimize the impact of this environmental condition.

COMMENT 14.3

3. The plan calls for filling in the lakes, home to birds and small animals who have lived there for years. A fountain lake will not replace this water.

RESPONSE 14.3

The lakes that are currently located within the infield of the racetrack are ornamental in nature and are not a natural water feature. As noted in Section IV.D Hazardous Materials/Risk of Upset, the existing ponds in the Main Track infield are part of the storm water management system currently permitted under NPDES Permit No. CA0064211, Order No. R4 2006 0062, and Monitoring and Reporting Program No. CI-8100, adopted by the RWQCB on 13 July 2006. Organic materials may be present in any sludge or sediments found at the bottom of the current infield pond, and the pond sediments and lining materials will be removed and disposed at an appropriately permitted off-site facility prior to general Property

grading in accordance with the protocols described in the SMP for off-site disposal. According to the preliminary grading plan and land use plan, the pond area would be filled with up to 25 feet of fill material within the former infield pond area to achieve the design grade prior to development for residential and park land uses.

Wildlife utilizing the existing ponds as a water source are habitat generalists that have adapted to urban developments and are well adapted to human activities and disturbances. Furthermore, the plan calls for replacing the lakes on site with a modern lake feature that will be engineered to naturally filter stormwater runoff prior to entering the storm drain system. The quality of the water within the lakes will be more suitable for birds and small mammals that generally occur in the project area and surrounding developed environs.

COMMENT 14.4

4. Traffic is already heavy on all the surrounding streets – streets in the city already need repair.

RESPONSE 14.4

Section IV. L. Traffic/Transportation of the Draft EIR discloses and analyzes the impacts of the Project on existing traffic conditions in the City. As part of the design features of the Project, the Project includes physical street improvements as part of the Project's circulation design. The Traffic Impact Study (Appendix G-1 to the Draft EIR) proposes on-site and off-site project design features to provide additional capacity to facility traffic flow along Century Blvd. and Prairie Ave. adjacent to the project site. The recommended design features/physical street improvements include street widening and/or roadway restriping for additional turn lanes, traffic signal equipment modifications, installation of a right-turn overlapping signal phase, and installation of two new traffic signals. Please refer to Response 6.5 for a listing of the intersections where physical street improvements will be incorporated as part of the Project.

The Project was found to significantly impact six intersections, and to mitigate these impacts, the Project will fully fund implementation of the ITS system at the six intersections it impacts, in addition to 13 intersections where the Project has no significant impact. Funding ITS at these additional 13 intersections completes the ITS system and will make it more effective at addressing the traffic flow. Please refer to Response 6.5 for further discussion regarding the implementation of the ITS system.

This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require an additional response.

COMMENT 14.5

5. We need more parks and sports fields for our children. Who is expected to take care of the proposed inadequate parks in “the city,” plus street maintenance – etc., etc.

RESPONSE 14.5

This comment is noted for the record and will be forwarded to the decision makers for their consideration. The project's potential impacts upon Parks and Recreation facilities are addressed in Section IV.K-4. As discussed therein, the Project proposes a system of park and recreation spaces throughout the development to serve the needs of the new residents, in addition to the existing Inglewood community. The extensive system of park and recreation spaces created by the Project is designed to create both active and passive forms of recreation. For example, some of the uses proposed for the parks include: half court basketball, an open field for informal sports, tot-lots, open lawns for picnic and play, sand court volleyball court, exercise par course, barbeque pavilions, sedentary game tables, and walking trails. Please refer to Section 3.2.1 "Parks and Open Space" beginning on Page 3-1 of the Hollywood Park Specific Plan for further details regarding the program amenities proposed for each park in the development. In addition, please refer to Response 6.7 for a discussion regarding the City's new park dedication ordinance which requires payment of fees or dedication of parkland for new developments which contain a residential component.

COMMENT 14.6

6. We do not have enough police officers now – never mind thousands more population.

RESPONSE 14.6

This comment is noted for the record and will be forwarded to the decision makers for their consideration. The project's potential impacts upon Police services are addressed in Section IV.K-1. Additionally, the Project includes the construction of a police substation within the Mixed-Use land use designation area as a Project Design Feature (PDF K 1-1), and a Security Plan detailing measures that will be implemented to provide adequate security both within the interior and exterior of the premises will be submitted for review and approval as part of the Plot Plan Review Process. (PDF K 1-2).

COMMENT 14.7

7. Only 1 hospital exists and it is on shaky financial ground often.

RESPONSE 14.7

This comment is noted for the record and will be forwarded to the decision makers for their consideration. Please note that the effects analyzed under CEQA must be related to physical changes in the environment. (CEQA Guidelines Section 15358(b)). Economic and social effects are not considered environmental effects under CEQA. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require an additional response.

COMMENT 14.8

8. Inglewood has not been able to overcome its bad reputation. Many people are too scared to come here. Gangs and graffiti do exist. A shooting occurred at my corner of Prairie and Buckthorn this week.

RESPONSE 14.8

This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require a response. The project's potential impacts upon Police services are addressed in Section IV.K-1.

COMMENT 14.9

9. The city should be very careful – not buy into this rosy proposed deal. It has much to lose.

Helen Wilton
618 East Buckthorn St.
Inglewood, CA 90301

RESPONSE 14.9

This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any specific challenge or objection pertaining to the environmental analysis and this does not require a response.

COMMENT LETTER No. 15

Gary Hildebrand, South Area Engineer
County of Los Angeles
Department of Public Works
Flood Maintenance Division
December 22, 2008

COMMENT 15.1

**Notice of Draft Environmental Impact Report
Hollywood Park Redevelopment Project**

This is in response to your request we received on October 16, 2008, regarding the subject line. The County of Los Angeles Department of Public Works (LADPW) Flood Maintenance Division has reviewed the subject documentation and offers the following comments

RESPONSE 15.1

This comment introduces the LADPW and their comments on the Draft EIR. No specific response is necessary. See Comments and Responses 15.2 through 15.4, below.

COMMENT 15.2

As stated on page IV.F-26 of the Hollywood Park Redevelopment Project Draft Environmental Impact Report (DEIR), the proposal includes the transfer of Miscellaneous Transfer Drain 922, a Hollywood Park Private storm drain, to the LACDPW for maintenance. Prior to transfer, the improvement storm drain plans must be submitted for review and meet Los Angeles County Flood Control District (LACFCD) standards. Therefore, ensure the guidelines stated on page IV.F-1 of the Hollywood Park Redevelopment DEIR regarding storm after facility design and construction are followed.

RESPONSE 15.2

This comment accurately re-states the proposal to transfer Miscellaneous Transfer Drain 922 to the LACDPW for maintenance. All guidelines stated on page IV.F-1 of the Hollywood Park Redevelopment DEIR regarding storm after facility design and construction will be followed.

COMMENT 15.3

On page 4-4 of the Hollywood Park Specific Plan, and page IV.F-26 of the Hollywood Park Redevelopment DEIR, the proposed project includes the relocation of LACFCD Storm Drain Project No. 4401 Line B, Unit 2. This action will require the involvement of our Mapping and Property Management Division. Additionally, new easements must be in favor of LACFCD for maintenance of the proposed storm drain.

RESPONSE 15.3

Comment noted. Any new easements created through the Tract Maps associated with the buildout of the Hollywood Park Specific Plan will be in favor of LACFCD for maintenance of the proposed storm drain.

COMMENT 15.4

Furthermore all proposed work affecting an LACFCD facility requires the project developer to apply for a construction permit from our Construction Division Permits Section.

Finally, all of the above actions can be coordinated through Amir Ibrahim of our Land Development Division at (626)458-5915.

Enclosed for your reference are as built drawings of Storm Drain Project No. 4401 Line B, Unit 2.

If you have any questions, please contact Steve Lipka at (562)861-0316.

Very truly yours,

Gail Farber
Director of Public Works

Gary Hildebrand
South Area Engineer
Flood Maintenance Division

RESPONSE 15.4

The Applicant and the City appreciate the assistance and coordination efforts offered through the LACDPW Flood Maintenance Division. The Applicant will file all applicable permits with the Construction Division Permits Section at the appropriate time prior to commencing any construction activities.

COMMENT LETTER No. 16

Mark Gorman
8194 Medford Street
Ventura CA 93004
December 23, 2008.

COMMENT 16.1

Dear Mr. Curry

This letter is to urge you to stop the destruction of our glorious historical landmark, Hollywood Park Racetrack. When I first came to Los Angeles thirty three years ago, one of the first things I did was visit this legendary facility. Being a horse racing fan all my life, I marveled at the vastness and beauty of the grounds. I was lucky enough to watch some of the greatest horses and jockeys of all time compete at a level I had never seen.

The racetrack is synonymous with the city of Inglewood. The fact that the powers that be would allow this impending devastation to come this close to fruition is beyond comprehension. There is a tendency among people that really value what Hollywood Park represents to sit back and hope that political representatives that have ultimate responsibility to the public will see the light. Unfortunately, as evidenced by the greed that manifested the crisis we now see in our economy, it is time to take action to protect truly meaningful irreplaceable facets of our lives. To allow The Hollywood Park Land Company to destroy an important part of our history for the economic benefit of the few would be a terrible injustice. I urge you to do whatever is necessary to stop this now!

Sincerely,

Mark Gorman
8194 Medford Street
Ventura, CA 93004

RESPONSE 16.1

Please refer to Responses 9.11 through 9.21 for a discussion regarding the Project site as a potential historic resource under CEQA. In addition, please refer to Response 9.122 for a discussion regarding alternatives to the Project that included preservation of racing at Hollywood Park.

COMMENT LETTER No. 17

PBS&J
Peer Review Consultant to the City of Inglewood
Gary Carlin Memorandum to Alison Rondone
November 18, 2008.

COMMENT 17.1

Re: Review of the Walker Parking "Shared Parking Analysis", dated September 25, 2007, and section IV. M. Parking of the Hollywood Park Redevelopment EIR

I have reviewed the Walker Shared Parking study and the Parking section of the EIR and I have the following comments listed below. I reviewed the parking study first since it is referenced within the EIR. As a result any discrepancies between the two documents will refer back to the parking study.

RESPONSE 17.1

This comment summarizes the commenter's methodology in reviewing the Parking section of the Draft Environmental Impact Report and therefore requires no response.

COMMENT 17.2

Walker Parking Consultants, "Shared Parking Analysis", dated September 25, 2007

- The study is only for the mixed use portion of the project and states that the parking for the residential uses will be based on the Hollywood Park Specific Plan.

RESPONSE 17.2

All parking requirements for the Project are proposed to be pursuant to the standards in the Hollywood Park Specific Plan. The Specific Plan uses a Shared Parking Study methodology for determining the required amount of parking for the Mixed-Use portion of the Project, as noted by the commenter. The Specific Plan also provides parking ratios based upon bedroom counts for the residential uses in the Residential Zone of the Project.

COMMENT 17.3

- Required Parking Supply: While the study calculates the parking supply required under the City of Inglewood code, the analysis is based on parking rates from ULI's Shared Parking, 2nd edition. The City of Inglewood code based analysis would require 5,690 spaces for the land uses shown in Table 1 on page 1.

RESPONSE 17.3

The Specific Plan provides flexibility of uses within the Mixed-Use Zone of the Project Site. A variety of different uses are permitted, and the parking need as determined by a shared parking methodology would depend on the parking characteristics of the ultimate uses. At the time the Shared Parking Study was conducted, the precise Mixed-Use Program for the site was still under development, so a sample program was analyzed. Subsequent to the Shared Parking Study (dated September 2007), the proposed Mixed-Use Program was refined and certain land uses were removed from the sample program. The most current proposed Mixed-Use Program does not contain a Grocery component, therefore, the land use quantity used for Grocery was moved to General Retail. As shown in the table below, the parking requirement under the Inglewood Municipal Code considering each component use in the mixed-use area on a stand-alone basis is approximately 5,209 parking spaces.

A principal variance in the City's Municipal Code versus the Shared Parking would be in the number of parking spaces required for the office uses. This is due to office uses peaking in the morning hours, while retail uses peak in the late afternoon and restaurants peak in the evening, therefore, using shared parking methodology in such cases serve the development well.

Additionally, while strict application of the Municipal Code for the Community Room as a whole (i.e., 10,000 SF) yields the requirement for 286 spaces, breaking the Community Room out to the specific uses that are contained within (4,900 SF of leisure area; 2,000 SF athletic club; 1,000 SF of office space) yields approximately 158 spaces requirement.

PROJECT—Mixed-Use Zone	Hollywood Park Specific Plan (Shared Parking)			Inglewood Municipal Code	
	AREA	Ratio ¹	Spaces	Ratio	Spaces
Retail	468,400 SF		1,043	60 + 1/400 SF, in excess of 14,000 SF	1,231
Restaurants	49,100 SF	-	765	1/150 SF	327
QSR "Take Out" Restaurants	42,500 SF	-	243	1/300 SF	142
Cinema	3,000 SEATS	-	517	1 per 5 seats	600
SUBTOTAL	620,000 SF		2,568		2,300
Casino	120,000 SF	-	1,534	1/75 SF	1,600
Office	75,000 SF	-	1	1/300 SF	250
Community Room ²	10,000 SF	-	158	1/35 SF	286
Hotel	300 ROOMS	-	281	102 spaces for first 100, plus 1/2 over 100	202
Banquet/Meeting Space	20,000 SF	-	315	1/35 SF	571
Total Parking Required (Mixed-Use Zone)			4,857		5,209
¹ Walker Parking uses Shared Parking Methodology to derive overall parking requirement for the land uses within the Mixed-Use Zone					

The analysis of City of Inglewood code based parking requirement is conducted in the Parking section of the Draft EIR, as noted by the commenter. The Shared Parking Study would derive a parking requirement based upon the use characteristics of the Mixed-Use program.

COMMENT 17.4

- Mode Split: The study references the 2000 census data as the basis for assuming that only 85% of patrons and employees of the site would drive themselves to the project. While this data may be accurate for the City as a whole, there is no discussion on how this relates to this project and how this reduction is justified.

RESPONSE 17.4

Adjustments for reduced use of automobiles owing to alternative modes of transportation, formal ridesharing programs, or different ratios of persons per car resulting from carpooling can be made when using shared parking methodology. Among the modes that may be available are commuter rail, light rail, bus, private automobile (including trucks, vans and SUVs used for personal transportation), carpools and vanpools, walking, and bicycling.

Industry best practice suggests the use of local mode split as provided in the US Census data for “Means of Transportation to Work”. For employees who work in the City of Inglewood, the US Census data indicates a reduction of 15% is appropriate for the sum of all employees. Although this does not indicate specifics about the location of each employer and how they are impacted, it is the best source of information currently available for the region. Based on prior research conducted by Urban Land Institute, assumptions are made regarding means of transportation using general demographics and transportation needs of employees for the various land uses.

At the Hollywood Park site, and more specifically the mixed-use commercial/retail component, the site is served by two major transit corridors (Century Boulevard and Prairie Avenue). Those corridors include a combined five bus routes, all of which go either directly to the Green Line rail station and bus transfer site or the LAX City Bus Center. The other two major arterials that run along the site (Manchester Boulevard and Crenshaw Boulevard) also are served by two bus routes each.

COMMENT 17.5

- Paid Parking: On page 6 of the study the last bullet before “Step 2” indicates that WMS may at some point in the future charge for parking on site. There is no further discussion on how or when paid parking would be implemented or on the potential impacts to the demands of the site.

RESPONSE 17.5

The Project Applicant may at some future point decide to collect a fee for parking. Paid parking in a retail setting is not out of place in Southern California or in most urban environments throughout the U.S. Paid parking is a function of how well the retail/commercial center is performing, and as such, it cannot be known today whether paid parking will be implemented. The Project Applicant has not indicated if or when it does in fact intend to charge for parking, but has requested that Walker also design the site with adequate drive aisles and queuing for access control equipment and cashier booths to plan for future needs. This would allow for a more seamless retrofit should the Project Applicant wish to engage in paid parking. The intent of adding paid parking would be to 1) discourage off-site employees and patrons from parking on-site, 2) recoup some of the cost to construct and/or operate the parking supply, but without hurting the vitality of the retail center.

COMMENT 17.6

- Walker Parking Demand Analysis: walker estimated parking demands based on ULI as 5,832 for weekdays and 6,153 for weekends. This does not include reductions for shared parking. These demand volumes were then reduced based on the mode split previously mentioned as well as “noncaptive adjustments” that basically reflect potential internal capture/trip chaining behavior. The noncaptive adjustment is not explained clearly and the report states that “Walker applies this factor in a judicious manner so not to create a parking shortfall.” It is not clear how this is done.

RESPONSE 17.6

Non-captive adjustments help to account for those long-term parkers who are already accounted for within one user group, but also generate activity for a second land use. An example of this would be an employee of a retail use eating at a Quick Serve Restaurant on their lunch break. Another example would be a resident of the Hollywood Park development traveling to the commercial portion of the site by means other than a single-occupant vehicle for any trip. These residents may be walking to a restaurant for dinner, or to watch a movie. The resident group would also include teens who may work within the commercial development.

From Walker's parking demand projections for employees, roughly 1,000 employees will be on the site during the peak period for weekdays, and about 750 on weekends. The entire development will contain roughly 3,000 residential units which will be tied to the commercial development through pedestrian friendly corridors. The reduction taken for non-captive adjustment are shown in the tables below.

Hollywood Park Weekday Land Use/User Group	Actual Reduction		Hollywood Park Weekend Land Use/User Group	Actual Reduction
Community Shopping Ctr	31		Community Shopping Ctr	34
Employee	4		Employee	5
Fine/Casual Dining	13		Fine/Casual Dining	10
Employee	3		Employee	3
QSR	208		QSR	196
Employee	4		Employee	4
Cineplex	19		Cineplex	27
Employee	0		Employee	0
Meeting/Banquet	29		Meeting/Banquet	22
Residential Guest	0		Residential Guest	0
Office 25K to 100K sf	0		Office 25K to 100K sf	0
Employee	9		Employee	0
Grocery	27		Grocery	31
Employee	2		Employee	1
Casino	0		Casino	0
Employee	0		Employee	0
Market Square	0		Market Square	0
Employee	0		Employee	0
Subtotal Customer/Guest Spaces	327		Subtotal Customer/Guest Spaces	320
Subtotal Employee Spaces	22		Subtotal Employee Spaces	14
Total Parking Spaces	349		Total Parking Spaces	334

In the Shared Parking Demand analysis for this site, most land uses use minimal non-captive reductions (ranging from 0% reduction to 5% reduction). The tables illustrate that the largest adjustment comes from the Quick Serve Restaurants on the site, which in some cases will be taken as carryout food off-site. The reduction for this land use is higher because patrons visiting the quick serve restaurant likely are at the Hollywood Park site for another use (i.e., these patrons likely would not come to the Hollywood Park site solely for the quick serve restaurant).

COMMENT 17.7

- Monthly Adjustment: while not discussed in the text there is also a monthly adjustment shown in Tables 4 and 5 for weekdays and weekends respectively. Since the analysis appears to be based on high season (late December) it is not understood why there would be any reductions for this analysis. A review of the tables in Appendix B clearly shows that late December has the highest demand so reducing the retail use (e.g. “community shopping center”) demands seems counterintuitive.

RESPONSE 17.7

While peak parking needs for retail uses occur during the holiday shopping season, demand for other uses may be considerably lower during that season. For example, conventions and seminars are less likely to be scheduled for the period between Thanksgiving and New Year’s Day, and business travel is significantly reduced in the last half of the month of December. The holiday shopping season further comprises part but not all of two months: November and December. Cineplex demand during the holiday shopping season is typically quite a bit lower, but will rise again during the period between Christmas and New Year’s Day. This has traditionally made the development and acceptance of default values for the month of December difficult. For these reasons, ULI’s Shared Parking posted a “13th month,” noted as “Late December,” for the period between Christmas and New Year’s Day, reflecting high attendance at active entertainment venues, lower demand at office and other employment-centered destinations, and moderate demand for retail.

In addition to the traffic and parking data available from ITE, there are more sources (i.e. ICSC) available that report on the seasonality of various commercial activities. For example, several firms now track and report the revenue from movie ticket sales on a monthly, even weekly basis. To the extent possible, new data has been employed to adjust and update the factors for seasonality used within the shared parking methodology. Being that the December time period is the peak period, it is set at 100%. Therefore, as all periods are below that peak period they must be some portion of 100%. The monthly adjustment factors used in this analysis come directly from the Shared Parking publication and are sourced therein.

COMMENT 17.8

- Summary Parking Demand: Once all of the adjustments had been (sic) applied a percentage reduction was calculated, specifically 33% for weekdays and 31 % for weekends. However this reduction is relative to the ULI based calculations and not the City Code.

RESPONSE 17.8

The commenter is correct in stating that shared parking reductions were related to ULI based parking requirements and not the City's parking code. As discussed in the IV.M of the Draft EIR and Response 17.2, the parking requirements applicable to the Project are proposed to be pursuant to the standards in the Hollywood Park Specific Plan, not the Inglewood Municipal Code. As a result, the adjustments referenced by the commenter were applied pursuant to the methodology provided in the Hollywood Park Specific Plan.

For the sake of comparison, the total parking requirement for the Mixed-Use Zone pursuant to the shared parking methodology outlined in the Hollywood Park Specific Plan is approximately 7% less than the requirements under the Inglewood Municipal Code. However, it should be noted that the Inglewood Municipal Code parking standards treat each use in the Mixed-Use program of the Project on a standalone basis, and does not recognize the synergies in parking that can be achieved in Mixed-Use developments, as recognized by the shared parking methodology.

COMMENT 17.9

- Step 8- Critical Needs/Management Concerns: Under this section Walker further reduced the overall parking supply by 100 spaces "...while only causing a projected shortfall in December and late December, and only for 2 pm 6 pm and 7 pm." There is no justification for this reduction. Further this section goes on to say, "There is also the possibility that over time visitors to the site will begin to adjust to the site and utilize available transit without affecting the vitality of the development." This is a bit of a stretch to put it mildly and is not supported by any analysis.

RESPONSE 17.9

Please refer to Response 5.40 for clarification of the meaning of Step 8 referenced in the comment.

COMMENT 17.10

- Summary: Based on all of the preceding comments it appears that the Walker parking "Shared Parking Study" has some significant issues that would likely lead require revision to the demand analysis. It is very likely that this revision would result in an increase in the calculated parking demand for the site.

RESPONSE 17.10

This comment is noted for the record and will be forwarded to the decision makers for their consideration. This comment does not raise any challenge or objections pertaining to the environmental analysis.

COMMENT 17.11**Section M, Parking, Hollywood Park Redevelopment EIR**

- The introduction of the parking section states that, “ ... the Shared Parking Analysis for the Hollywood Park Project, prepared by Walker Parking Consultants (September 25, 2007) ...” is the basis for the assessment of the parking demands associated with the mixed use portion of the project.

RESPONSE 17.11

Please refer to Response 17.2.

COMMENT 17.12

- Table IV.M-1: this table is a summary of the parking supply requirements based on the City of Inglewood Code. It should be noted that the development program for the mixed use program in this table varies significantly from the program analyzed in Walker's parking study. Specifically this table includes a 300 room hotel with 20,000 square feet (SF) of meeting space which was not included in the original parking study. Further, the total amount of retail space shown, 468,400 SF does not correlate with the total from the parking study which was 423,400 SF. As a result the total required parking supplies are different. The parking study shows a total requirement of 5,690 parking spaces. The parking section of the EIR shows a total demand of 5,209 parking spaces or 481 less spaces for a program that includes more development.

RESPONSE 17.12

The Specific Plan provides flexibility of uses within the Mixed-Use Zone of the Project Site. A variety of different uses are permitted, and the parking need as determined by a shared parking methodology would depend on the parking characteristics of the ultimate uses. At the time the Shared Parking Study was conducted, the precise Mixed-Use Program for the site was still under development, so a sample program for purposes of demonstrating the analysis was utilized. Subsequent to the Shared Parking Study (dated September 2007), the proposed Mixed-Use Program was refined and certain land uses were removed from the sample program.

Please refer to the table in Response 17.3 for a comparison of parking requirement for the proposed program in the Mixed-Use Zone using the shared parking methodology as provided in the Hollywood Park Specific Plan, as compared to the Inglewood Municipal Code.

COMMENT 17.13

- Shared Parking Discussion: On page IV.M-9, the text states that, “The land uses and quantities contained in the tables below are, therefore, not the precise program.” Does this mean that additional analyses will be submitted at a future date?

RESPONSE 17.13

The Hollywood Park Specific Plan creates a framework for design and development that will happen over

many years. For some land uses in the Mixed-Use Zone of the Project, the Specific Plan includes the use of a shared parking methodology (instead of the Inglewood Municipal Code standards) to calculate the required amount of parking that must be built to support the land uses to be constructed. Given the long-term build-out of the Project, it would not be possible to provide a detailed plan for which precise mix of tenants would occupy the retail portion of the Project Site. Once the precise tenants are known at the time of the submission of the Plot Plan Review application, a shared parking analysis will be submitted to determine the actual amount of parking required based on the specific use. In order to approve the Plot Plan Review application, the decision-makers must find that there is adequate parking provided. From an environmental impact analysis, the Draft EIR discusses and discloses the impacts of implementing the Specific Plan as the Project and based on the framework presented in the Specific Plan, analyzes the environmental impacts of implementing the Project on the existing community.

COMMENT 17.14

- Step 6-Noncaptive adjustment: The noncaptive adjustment is not explained clearly and the report states that “This factor is applied in a judicious manner so not to create a parking shortfall.” It is not clear how this is done.

RESPONSE 17.14

Please refer to Response 17.6.

COMMENT 17.15

- Tables IV.M-2 and M-3: The shared parking demand analysis for weekdays and weekends are shown in these two tables and how significantly different total required parking spaces than shown in the Walker Parking Study.

RESPONSE 17.15

The shared parking demand analysis for weekdays and weekends will be updated based on the Mixed-Use program in Table IV.M-1, pursuant to the Parking section of the Draft EIR. Please see the Additions and Corrections Section of the Final EIR.

COMMENT 17.16

- Total Parking Demand: on page 14 of the parking section, the third paragraph indicates that a total supply of 5,326 parking spaces is required to satisfy projected demands. However this number does not correlate with any of the totals shown in the previously referenced tables.

RESPONSE 17.16

The sample program that was run for the shared parking demand on the weekend, Table IV. M-3,

generated a total of 4,922 spaces. The note at the bottom of the Table IV.M-3 states that the sample program assumed a maximum of 202 residential units in the Mixed-Use Zone area, typically over the retail uses. As such, these units would generate parking demand in addition to the total of 4,922. If all of the 202 units were two bedroom units, an additional demand of 404 spaces (202 X 2 spaces per unit, per the Residential Parking requirement in the Specific Plan, Section 2.11.1.2 Required Residential Parking Within Mixed Use Zone) would be required, bringing the total spaces to 5,326 (4,922 + 404).

However, as the mixed use program was revised since the time the Shared Parking study was done, an updated Shared Parking Study will be included in the Final EIR.

COMMENT 17.17

- Land use Equivalency Impacts: There is a discussion of potential “limited” exchanges of land uses within the project. However no details are provided as to how these exchanges will take place or what “limited” means unless it is through the means of future parking studies. This is not clear.

RESPONSE 17.17

Please refer to Response 5.13.

COMMENT 17.18

- Impact Summary: Since the parking section is based on an apparently flawed shared parking study and since the development program that was evaluated in the parking study is not the same as shown in the EIR it is strongly recommended that the EIR Parking section be updated so as to be consistent with the parking study after the issues with the parking study have been addressed.

RESPONSE 17.18

The Specific Plan provides flexibility of uses within the Mixed-Use Zone of the Project Site. A variety of different uses are permitted, and the parking need as determined by a shared parking methodology would depend on the parking characteristics of the ultimate uses. At the time the Shared Parking Study was conducted, the precise Mixed-Use Program for the site was still under development, so a sample programs was utilized in the analysis. Subsequent to the Shared Parking Study (dated September 2007), the proposed Mixed-Use Program was refined and certain land uses were removed from the sample program.

A updated Shared Parking Study will be provided in the Final EIR that updates the Mixed-Use program to be consistent with the program indicated in Table IV.M-1 of the Parking section of the Draft EIR. It should be noted that the final mixed-use program may change as the mix of uses in the retail/entertainment center is further refined. So long as the parking required at the time of Plot Plan Review for the final mix of uses is consistent with the standards in the Hollywood Park Specific Plan, impacts would remain less than significant.

COMMENT LETTER No. 18

PBS&J

Peer Review Consultant to the City of Inglewood

Gary Carlin Memorandum to Alison Rondone

November 20, 2008.

COMMENT 18.1

I have reviewed the LLG traffic study and the Parking section of the EIR and I have the following comments listed below. I reviewed the traffic study first since it is referenced within the EIR. As a result any discrepancies between the two documents refer back to the parking study.

RESPONSE 18.1

This is an introductory/general comment. No response to this comment is required.

COMMENT 18.2

Linscott Law & Greenspan (LLG) Traffic Impact Study, dated August 1, 2008

- Table 6-2 shows that for an assumed 10,000 attendee event the existing uses generate 19,936 daily trips. This would seem to indicate that almost all attendees arrive via single occupant automobile. Is this reasonable? Also, the ratio of trips for weekdays (19,936 trips/10,000 attendees) is significantly different than for weekend events which are show in Table 6-3 as 13,986 trips/15,000 attendees. Why is there such a dramatically different trip generation rate?

RESPONSE 18.2

As summarized in Section 2.3 (Proposed Project Description), Page 3 of the Traffic Impact Study (Appendix G-1 of the Draft EIR), the proposed Hollywood Park Redevelopment Project consists of the removal of all uses on-site, except the Casino which will remain at its current location. The weekday and weekend project trip generation forecasts, as shown in Tables 6-2 and 6-3, Pages 41-45, Appendix G-1 of the Draft EIR, appropriately incorporated traffic of the Casino/Off-Track Betting component first as a new use and then subtracted it as part of the overall existing uses to be removed (so no net new trips would be generated from the Casino/Off-Track Betting component using this methodology). As a result, the existing uses to be removed included trip generation forecasts for both traffic associated with the racetrack as well as traffic associated with the project casino component (and not associated with only the racetrack component as noted by the commenter). Thus, the trip generation forecast cited in the comment (19,936 daily trips) includes vehicle trips associated with the existing casino (to remain) and the live horse racing (to be removed) based on a 10,000 patron event.

As described in Appendix B-3 of the Draft EIR Traffic Impact Study a trip generation rate for the existing

uses was derived from the actual attendance and trip generation data associated with the current uses. Because of the mix of uses currently on the site, certain assumptions had to be made in order to determine the rate associated with each individual use. One possible methodology derives a trip rate per attendee by taking trips associated with live racing/casino and subtracting trips associated with OTB/casino, averaging the rate over the spring and fall meets, to derive a trip rate associated with live racing only. (i.e.: With horse racing: $1,801 \text{ trips with } 3,384 \text{ attendees} = (1,801-1,037)/(3,384-2,034) = 0.57 \text{ trips/attendee}$ (spring data collection); With horse racing: $1,742 \text{ trips with } 2,902 \text{ attendees} = (1,742-1,037)/(2,902-2,034) = 0.81 \text{ trips/attendee}$ (fall data collection); Average with horse racing = $(0.57+0.81)/2 = 0.69 \text{ trips/attendee}$.)

The difficulty in directly using trip and attendance data from the current Hollywood Park operations is that the traffic counts also include trips related to the adjacent casino, and when racing is not in session patrons still come to the track for Off-Track-Betting. Thus, for purposes of determining the trip generation rate associated with higher live racing attendance levels at the site, as shown in Appendix B-3 of the Draft EIR Traffic Impact Study, the traffic count data collected with live racing and with OTB/casino use were compared to determine a specific trip rate (vehicle trips/attendee) associated with live racing only. For example, for the Weekday pm peak period during the Spring meet, there were 1,472 outbound trips noted at the driveways. When racing was not in session, although there were 646 outbound trips in the pm peak hour, some of those trips are assumed to be going to the track for OTB. Based upon studies of casino related traffic patterns, it is reasonable to assume the same number of casino trips is in-bound as are outbound. Accordingly, only 391 pm trips were subtracted from the 1,472 trips that were counted at the driveways, yielding 1081 trips associated with racing, for a trip generation rate based upon that day's 3,384 documented attendance, of .32 (or $1,081/3,384$).

We would further note that additional traffic counts were recently conducted at Hollywood Park in response to comments that the traffic analysis needed to include counts conducted during school-time conditions (14 of the study intersections in the Draft EIR were evaluated using traffic counts conducted in June after the close of the school year). These supplemental counts were conducted on two Tuesdays (one in December and one in January) when only the casino was in operation (i.e., no live racing or satellite wagering in operation). The supplemental counts are included in the Technical Memorandum included in the Final EIR.

The "casino only" trips averaged over the two days of counts were 386 inbound and 333 outbound. In reviewing this data, the following is noted: First, in the DEIR traffic study (Appendix B of the traffic study), the inbound and outbound casino-only trips were assumed to be 391 in and 391 out. As seen above, the actual counts are generally consistent, although slightly lower as compared to the estimate provided in the Draft EIR traffic study for the casino. Thus, if anything, track related traffic has been underestimated for purposes of calculating the trip related credit. Second, in taking the total casino trips ($386+333=719$ total PM casino trips) and subtracting from the two days of live racing traffic counted for the Draft EIR traffic study, the resulting trip rates for live racing only traffic would equate to the trip rate ($0.03 \text{ trips/attendee inbound} + 0.32 \text{ trips outbound} = 0.35 \text{ total PM peak hour trips/attendee}$) derived in the Draft EIR traffic study:

- o Spring: $(1,801 - 719 = 1,082 \text{ trips})/3,384 \text{ attendees} = 0.32 \text{ trips/attendee}$
- o Autumn: $(1,742 - 719 = 1,023 \text{ trips})/2,902 \text{ attendees} = 0.35 \text{ trips/attendee}$

This rate is about half of the rate derived from the alternative methodology, and represents a conservative assumption for a trip generation rate associated with live racing.

In the development of attendee trip generation rates applicable for the racetrack component, peak period driveway traffic counts were conducted for multiple days both with and without live racing on weekdays and on weekends. Specifically, driveway traffic counts were conducted for two weekday live racing events, one weekday without live racing event, three weekend live racing events, and one weekend without live racing event. The results of the various peak period driveway traffic counts determined that the derived trip generation rates on a per racetrack attendee basis are lower during the weekend when compared to the weekday conditions. On weekdays, it has been observed that patrons to the Racetrack are more likely to drive alone or in small groups. On weekends, more patrons to the Racetrack are likely to travel with friends and family as part of a social outing. Therefore, the average vehicle occupancy on weekends was determined to be higher than on weekdays resulting in a lower trip generation rate derived on a per racetrack attendee basis, as evident by the traffic count data collected.

COMMENT 18.3

- Table 6-2 under note 15 indicates that for the credit attributable to the existing operations it was assumed that 20% of the daily traffic occurs during the PM peak hour. This seems very high and would (sic) to a greater “credit” that might otherwise be expected. Is there any basis for this assumption?

RESPONSE 18.3

Traffic generation forecasts associated with the existing uses to be removed were determined based on actual driveway traffic counts conducted over various weekday and weekend conditions. The weekday driveway traffic counts were conducted during the morning commuter peak period between 7:00 AM and 9:00 AM and the afternoon commuter peak period between 4:00 PM and 6:00 PM. The weekend driveway traffic counts were conducted during the midday peak period between 11:00 AM and 2:00 PM. The highest one hour totals for each of the different time periods were then identified to develop the respective weekday AM peak hour, weekday PM peak hour, and Saturday Midday peak hour conditions, as analyzed in the Draft EIR traffic impact study. The daily traffic forecasts for the existing uses were derived by assuming that the PM peak hour conditions represent approximately 20% of the daily totals (i.e., $3,987 \text{ PM peak hour trips} / 20\% = 19,936 \text{ daily trips}$). It is important to note that the PM peak hour trip generation forecasts were not derived based on daily totals as inferred by the commenter. Rather daily total trips were estimated based on actual counts of PM peak hour trips. If, as the commenter suggests, the peak hour trips are actually a smaller fraction of total daily trips, then total daily trips would be larger than estimated, and again the EIR would have assumed a more conservative result. For example, if PM peak trips represented only 10% of daily trips, then total daily trips to be eliminated by

the project would be: 39,870 (i.e., 3,987 PM peak hour trips / 10% = 39,870 daily trips).

The ITE Trip Generation publication provides one observation/study for horse racetrack use. A weekday PM peak hour trip generation rate of 0.13 trips per attendee and a daily trip generation rate of 1.09 trips per attendee were noted based on the one ITE observation. This suggests that the weekday PM peak hour trip generation for racetrack use represents approximately 12% of the daily trip generation (0.13 PM peak hour trips per attendee / 1.09 daily trips per attendee = 12%). In standard traffic engineering practice, it is also commonly assumed that the peak hour traffic represents approximately between eight to 12 percent of the daily traffic forecasts, depending on various land uses. However, had a similar range of percentages been applied to develop daily traffic forecasts for the racetrack, it would actually result in a much higher daily trip generation “credit” which does not seem to be justified (i.e., 3,987 PM peak hour trips / 12% = 33,226 daily trips, 3,987 PM peak hour trips / 8% = 49,838 daily trips). Therefore, the daily trip generation forecasts as outlined in the Draft EIR traffic study for the existing uses to be removed component are appropriate.

COMMENT 18.4

- Internal Capture: Tables 6-2 and 6-3 show internal capture rates based on ITEs “Trip Generation Handbook”. Some of these percentages seem high especially the general office category at 20% - are there calculations available to support these percentages?

RESPONSE 18.4

The calculations associated with the internal capture percentages for the proposed project are included in the FEIR (see Appendix K-7 of the Final EIR). As discussed on Page 39, Appendix G-1 of the Draft EIR, the internal capture rates were developed based on the methodology outlined in Chapter 7 – Multi-Use Development of the Trip Generation Handbook, An ITE Recommended Practice, published by the Institute of Transportation Engineers (ITE), June 2004. Specific ranges of internal capture rates are recommended in the ITE document on Tables 7.1 and 7.2 therein. Internal capture characteristics and reductions are typically applicable for mixed-use development projects consisting of retail, office, and/or residential uses. As the proposed Hollywood Park Redevelopment Project includes all three of these land use components, it is therefore appropriate to apply the internal capture percentages as recommended in ITE guidelines.

COMMENT 18.5

- Pass-By Capture: Table 6-2 and 6-3 also shows a pass-by capture rate of 23% - are there calculations available to support this percentage?

RESPONSE 18.5

The calculations associated with the pass-by percentages for the proposed project are included in the FEIR (see Appendix K-7 of the FEIR). As discussed on Page 39, Appendix G-1 of the Draft EIR, the

pass-by reductions were developed based on the methodology and equations contained in Chapter 5 – Pass-by, Primary and Diverted Linked Trips of the Trip Generation Handbook, An ITE Recommended Practice, published by ITE, June 2004. Specifically, it is shown on Figure 5.5 of the ITE document that for a retail center providing 620,000 square feet of floor area (i.e., the size of the retail component of the project), a pass-by trip percentage of 23% is recommended. Pass-by trips are made as intermediate stops on the way from an origin to a primary destination without a route diversion. Pursuant to ITE guidelines, separate pass-by reductions were developed for the weekday and weekend analysis conditions. It should be noted that pass-by reductions were appropriately applied to the project retail component only. No pass-by reductions were applied to any of the other components of the project.

COMMENT 18.6**Section L, Traffic/Transportation, Hollywood Park Redevelopment EIR**

- General Comment: if any of the comments on the traffic section require any revisions than this section will have to be updated accordingly.

RESPONSE 18.6

The Final EIR has been updated to reflect the analyses undertaken in response to comments.

COMMENT 18.7

- Transit Usage: While not a major issue, there is a consistency issue in that the traffic study did not assume any significant transit usage while the parking study assumed 10%.

RESPONSE 18.7

As discussed in Section 4.5 Public Transit Services, Pages 17/20-23, Appendix G-1 of the Draft EIR, public transit services are currently provided along major roadways within the project vicinity: Century Boulevard, Prairie Avenue, Manchester Boulevard, and Crenshaw Boulevard. Although public transit information was provided in the traffic impact study, the traffic analysis conservatively incorporates no reduction in the determination of the proposed project's vehicular trip generation forecasts and the corresponding traffic impacts to the surrounding street system to account for project-related trips that may be made via public transit in lieu of private automobiles. Had some transit reduction been applied to the project trip generation forecasts (i.e., 10% reduction consistent with the parking study), the forecast level of project-related traffic impacts would likely be reduced.

COMMENT 18.8

- Civic Use Component: The section states that the analysis “conservatively” assumed that an elementary school would occupy the civic parcels. However, since the pm peak hour is the most crucial analysis period a middle or high school would generate more traffic and therefore be more conservative. Has there

been any discussion with the school board to determine the most likely use of the property?

RESPONSE 18.8

As discussed on Pages 38-39, Appendix G-1 of the Draft EIR, a four acre site is proposed for civic uses which may include a school, a library, a community center, etc. The school district has indicated an interest in developing an elementary school and therefore the weekday AM peak hour traffic analysis was appropriately prepared on this basis. Moreover, given the 4-acre size of the site, it would not meet the state-mandated acreage requirements for high school and would only meet the state-mandated acreage requirements for a very small middle school.

Among the uses that may be developed on the civic use parcel, a library use has higher trip generation potential than an elementary school or a community center during the weekday PM peak hour and the Saturday Midday peak hour analysis time periods. As a result, the Draft EIR traffic impact analysis conservatively assumed that the civic use component would be developed as a library use for purposes of evaluating potential traffic impacts of this project component during the weekday PM peak hour and the Saturday Midday peak hour conditions. Additional traffic analyses assuming middle or high school use are not necessary as the assumed library use would have a higher trip generation potential than a middle or high school during the weekday PM peak hour condition.

COMMENT 18.9

- Projected Build-out: The analysis assumes a build-out of 2014 which seems rather fast considering the magnitude of the project, the environmental permitting environment and the economy. If this end date gets pushed out it will charge the background traffic volumes which will no doubt increase with any extensions.

RESPONSE 18.9

Based on information provided by the project applicant, the proposed Hollywood Park Redevelopment Project is anticipated to be completed by the Year 2014. The comment with respect to the projected build-out will be forwarded to the decision-makers for consideration.

COMMENT 18.10

- Construction Traffic Trip Generation: If we assume that 200,000 tons of existing building materials must be removed from the site that the statement that "...up to 50 truck trips per day are anticipated." is probably inaccurate. Based on the information provided in the study $50 \text{ trucks/day} \times 20 \text{ tons/truck} \times 22 \text{ workdays/month} \times 6 \text{ months} = 132,000 \text{ tons}$, not 200,000. The truck traffic would have to be on the order of 76 trucks per day to remove the debris as stated. Also, the trip generation rates for construction workers, i.e., .36 worker vehicle trips/day for residential development and 0.32 worker vehicle trips/day for commercial development seems low. Is there any backup data for this assumption?

RESPONSE 18.10

As stated on Page IV. L-59, “The Project Applicant anticipates that trucks with a capacity to carry at least 20 tons of material per truck will be used during the export period.” [Emphasis added]. Given that the 20 ton capacity of the trucks is a minimum, the estimated 50 truck trips per day for 22 work days per month for 6 months remains to be a reasonable estimation of the amount of trucks needed to remove the estimated 200,000 tons of debris.

During the final grading and structure construction period, a trip rate of 0.36 worker vehicle trips per unit of residential development per day and 0.32 worker vehicle trips per 1,000 square feet of commercial development per day is assumed. These trip generation rates are based on information contained in the Sacramento Metropolitan Air Quality Management District’s Air Quality Thresholds of Significance Handbook (Sacramento Metropolitan Air Quality Management District (1994)).

COMMENT LETTER No. 19

PBS&J

Peer Review Consultant to the City of Inglewood

Alison Rondone

December 10, 2008.

COMMENT 19.1

RE: Draft Environmental Impact Report for the Hollywood Park Redevelopment Project SCH No. 2007111018

Dear Mr. Curry:

To supplement our comments of November 24, 2008 on the Draft EIR for the Hollywood Park Redevelopment Project, further comment with regard to the project phasing is provided, below.

RESPONSE 19.1

This comment notes that it is a supplement to the Comment Letter No. 9 provided in the Final EIR.

COMMENT 19.2

The Project Description should be updated to include the more specific phasing plan that was recently submitted by the project Applicant. Each section should be carefully reviewed to ensure that changes in the phasing assumptions do not result in any changes to impact conclusions. For example, the Draft EIR assumed 1,000 residential units to be constructed in Phase 1, while the updated phasing plan indicates that 1,600 residential units would be constructed in Phase 1. While the total number of residential units is

consistent (2,995), constructing more residential units in Phase 1 than analyzed in the Draft EIR could result in more severe impacts to traffic, air quality, noise, hydrology, public services, and utilities than analyzed in the document if more intense construction would occur so as to achieve the overall construction schedule for the phase. It should be clarified that the same amount of construction equipment and workers as analyzed in the Draft EIR would be on site with the revised phasing plan. In addition, it is unclear whether the phasing analysis in the traffic section of the EIR (Section IV.L) includes construction and operation, construction alone, or operation alone. The Draft EIR should be revised to clearly state what the analysis consists of and should ensure that both construction and operational traffic impacts from project phasing are accurately analyzed.

If you have any questions, please feel free to contact me at any time.

Sincerely,

Alison Rondone
Senior Project Manager
PBS&J

RESPONSE 19.2

The proposed phasing plan for the Project has two parallel components—construction phasing (detailing the construction of the property based on market conditions) and the traffic mitigation program phasing (detailing the implementation of the Project's operational traffic mitigation program based on project occupancy). The traffic mitigation phasing plan ties the overall operational Project mitigation to completion of a specified number of units. Consequently, the 1,000 units referred to in the comment reflects the trigger point for implementation of the first portion of the Project's traffic mitigation measures, to ensure that mitigation implementation is coordinated with expected traffic impacts.

In contrast, the construction process is intended to be on-going and fluid. For purposes of estimating impacts, it was assumed that four major development phases would occur with construction, starting with the casino renovation and retail center in the southwest corner of the property and continuing northeasterly toward the proposed Bluff Park and the existing Renaissance neighborhood. Construction is assumed to be on-going at all times through 2014. Precise timing of the residential development is primarily a function of current market conditions. Nonetheless, impacts were assumed to be consistent with continuous construction. Therefore, no updates to the Project Description are necessary.

The proposed phasing program is based on the following objectives:

1. Provide for an orderly buildout of the community based on current market trends.
2. Insure adequate public facilities and services concurrent with private development.
3. Provide a range of housing opportunities at a variety of densities as the community develops.

4. Protect the public health, safety and general welfare.

The proposed phasing program considers the following factors:

1. The casino will remain in continuous operation during renovations. Construction will be staged to maintain safe parking and access to the facility.
2. Demolition of all buildings on the property (except the Casino) will be in Phase 1.
3. Mass grading of the entire property to balance cut and fill to the maximum extent possible in Phase 1. (Crushed concrete and asphalt from demolition will be stockpiled on later phases for use in on-site road construction).
4. Infrastructure phasing.
5. Open Space/ Project Amenity Phasing.
6. Market absorption and access to the graded lots.
7. Availability of emergency access routes for each phase of development.
8. Traffic Mitigation Improvement Phasing.

The analysis in the Draft EIR Section IV, Environmental Impacts, considers the phasing objectives and factors described above when analyzing the environmental impacts resulting from construction for each impact category.

COMMENT LETTER No. 20

PBS&J

Peer Review Consultant to the City of Inglewood

Gary Carlin Memorandum to Mr. Sheldon Curry, City of Inglewood

January 14, 2009.

COMMENT 20.1

Re: Hollywood Park Redevelopment EIR

This is an updated review based on receipt of the full traffic study and the full traffic study technical appendices.

Linscott law & Greenspan (LLG) Traffic Impact Study, dated August 1, 2008

• Racetrack Trip Credit Calculations: As previously noted there were concerns over the quantity of trips that were being credited based on the racetrack use. The applicant indicated that the additional background materials would address these questions. However upon further review of the additional materials the following questions still need to be addressed:

RESPONSE 20.1

This is an introductory comment. Specific and technical responses are provided in the following responses to comments.

COMMENT 20.2

There is a significant computational mistake in Appendix B-3 that will increase the weekday outbound PM peak hour traffic from 3,297 to 5,000 peak hour trips due to the use of 1,081 instead of 1,801 when calculating the trips. This represents a significant increase in offsite traffic that will likely change the results of the impacts analysis.

RESPONSE 20.2

There was no calculation error as suggested by the commenter. Appendix B-3 of the Draft EIR Traffic Impact Study provides a summary of the methodology and assumptions utilized in the development of trip generation associated with a 10,000-attendance weekday and 15,000-attendance weekend live horse racing events. The trip generation forecasts associated with the 10,000 weekday and 15,000 weekend events were then utilized in determining the trip generation “credit” for the existing uses in the overall project trip generation analysis. Please refer also to response 18.2.

As described in the Section II. Project Description of the Draft EIR, the Project Site has an existing racetrack and casino. As part of the Project, the existing Hollywood Park Racetrack will be removed to accommodate the Proposed Project, while the existing Casino currently on-site will remain at its current location. To analyze the Project’s impacts on traffic, a trip generation forecast were determined for the proposed new uses on the Project Site, and a trip generation credit for the racetrack (since it will be removed) was also determined. The difficulty in directly using trip and attendance data from the current Hollywood Park operations to determine the appropriate existing use credit for the racetrack is that the traffic counts also include trips related to the adjacent casino, and when racing is not in session, patrons still come to the track for off-track betting. As such, it was necessary to develop a method to isolate the racetrack and casino trips so as to create a reasonable trip generation credit for the racetrack to be removed.

There are two different methods for calculating the trip generation for the existing racetrack. One method is the “straight line” method. The straight line method derives a trip generation rate per attendee by taking trips associated with live racing + Casino and subtracting trips associated with Casino to derive a trip rate associated with live racing only. Given that there is a spring and fall racing season, an average of

the generation rates calculated was taken. This method produces a rate of 0.69 trips/attendee as shown in the calculation below.

Spring data with live horse racing: 1,801 trips with 3,384 attendees = $(1,801-1,037)/(3,384-2,034) = 0.57$ trips/attendee

Fall data with live horse racing: 1,742 trips with 2,902 attendees = $(1,742-1,037)/(2,902-2,034) = 0.81$ trips/attendee (fall data collection)

Average with live horse racing = $(0.57 + 0.81)/2 = 0.69$ trips/attendee

The alternative method that can be used for calculating the trip generation for the existing racetrack is the methodology used in the Draft EIR. In the Draft EIR, the methodology utilized to develop the trip generation for existing uses was based on driveway traffic counts conducted during events at the site with live racing and without live racing. As these driveway traffic counts included both the racetrack and the casino/off-track betting components, the first step to determine trip generation for the racetrack component involved isolating the racetrack traffic from the driveway counts. Based on the PM peak hour driveway traffic counts conducted during the “Without Live Racing” condition, a total of 391 inbound trips were recorded. It is reasonable to assume that these 391 inbound trips are mostly associated with the casino component as the racetrack is near closing during this time. Based on information provided in the article “Recalibration of Trip Generation Model for Las Vegas Hotel/Casinos” from the May 2002 edition of the *ITE Journal*, the directional inbound and outbound distribution for casino uses during the weekday PM peak hour is approximately 50% inbound and 50% outbound. Additionally, as noted in Response 18.2, the actual, site-specific data collected for the Project Site confirmed the reasonableness of this 50/50 assumption. As a result, it can be expected that there are about 391 outbound trips associated with the casino during the weekday PM peak hour. Relevant pages from the referenced *ITE Journal* are included in the FEIR (see Appendix K of the FEIR).

Based on the PM peak hour driveway traffic counts conducted during the “With Live Racing” (Spring) condition, a total of 1,472 outbound trips were recorded. As the 1,472 outbound trips included both the racetrack and the casino component, it is therefore appropriate to subtract the casino traffic in order to determine the trips associated with the racetrack component during the PM peak hour in the outbound direction (1,472 total outbound trips – 391 casino outbound trips = 1,081 racetrack outbound trips). Therefore, the use of the 1,081 number is appropriate and there is no “significant computational mistake” as noted by the commenter.

The next step in the determination of the racetrack trip generation involved the derivation of a per racetrack attendee trip rate. Based on information provided by the current Hollywood Park racetrack operations, the racetrack attendance on the day where traffic counts were conducted during the “With Live Racing” (Spring) condition totaled 3,384 attendees. Therefore, a per attendee trip rate for the PM peak hour outbound direction was determined to be 0.32 outbound trips per attendee (1,081 racetrack outbound trips / 3,384 attendees = 0.32 outbound trips per attendee). For comparison purposes, the same

methodology was also utilized to determine the per attendee trip rate during the “With Live Racing” (Autumn) condition which resulted in a 0.30 outbound trips per attendee. The relatively high correlation of the derived trip rates (i.e., 0.32 vs. 0.30) between the two days of traffic counts is an indication that the methodology used in the Draft EIR for determining trips by live horse racing is valid.

The same approach/methodology was also applied to develop the per racetrack attendee trip rate for the Saturday Midday peak hour. As summarized in Appendix B-3 of the Draft EIR Traffic Impact Study, a total of four separate sets of Saturday counts were utilized in the determination of the per attendee trip rates (three Saturday driveway traffic counts “With Live Racing” and one Saturday driveway traffic counts “Without Live Racing”). The per attendee trip rate for the Saturday Midday peak hour inbound direction was calculated to be 0.12 inbound trips per attendee for all three “With Live Racing” events. As three separate sets of count data conducted during three separate “With Live Racing” events all resulted in the same trip rate per attendee, the methodology and assumptions utilized in the determination of trip generation for the existing uses in the Draft EIR Traffic Impact Study are appropriate and valid.

In addition, as compared to the other methodology described herein, the methodology utilized in the Draft EIR presents a more conservative estimation of the per attendee trip generation for the racetrack—that is, the methodology in the Draft EIR yields a 0.32 per attendee trip generation rate as opposed to a 0.69 per attendee trip generation rate.

To further address the comment, two sets of additional weekday AM and PM peak period driveway traffic counts were recently conducted during the “Without Live Racing” condition (with the Racetrack closed). The additional driveway traffic counts are summarized in the FEIR (see Appendix K-5 of the FEIR).

COMMENT 20.3

I have serious reservations about many of the assumptions used for the “credit” calculations associated with the horse track; specifically they didn’t provide back up for many of them and contrary to what they say in the report they are anything but conservative and reflect attendance levels that exceed 90% of the annual maximum attendance.

RESPONSE 20.3

Refer to Response to Comment 20.2 for additional clarification and discussion regarding the methodology and assumptions utilized in the development of traffic forecasts associated with the existing uses.

As discussed in Response 7.7, the trip credit is not meant to be a deduction to reflect the baseline conditions on the days the counts were taken. Rather, the credit for existing racing use reflects the fact that racing traffic fluctuates considerably with time, seasons, and other factors. The credit taken represents a portion of the traffic that could be generated by the racetrack at full-capacity when racing is in session. Racing attendance varies greatly, so the credit was based on: (i) a review of long-term attendance records and an estimate of the trips associated solely with track attendance, and (ii) the assumptions provided in the General Plan.

Using historic attendance records and General Plan assumptions for the credit calculation is predicated on the rights of the Project Applicant to continue racing on the Project Site under the current entitlements. Applying established usage to determine the baseline environmental setting is an accepted concept under CEQA case law. As summarized in *San Joaquin Rapture Rescue Center v. County of Merced*, 149 Cal.App.4th 645, 658, “Although the baseline environmental setting must be premised on realized physical conditions on the ground, as opposed to merely hypothetical conditions allowable under existing plans, established levels of a particular use have been considered to be part of an existing environmental setting. ‘Environmental conditions may vary from year to year and in some cases it is necessary to consider conditions over a range of time periods.’” (citations omitted).

The proposition is supported in a 1999 California Court of Appeal case, *Fairview Neighbors v. County of Ventura* (70 Cal App. 4th 238). In *Fairview*, the plaintiffs challenged Ventura County’s approval of a conditional use permit to expand mining operations of the respondent. *Fairview* argued that the EIR violated CEQA by “falsely stating that truck traffic under the ‘existing setting’ would consist of 810 trips daily...” as was allowed under the an existing use permit. (240). Instead, *Fairview* argued that the EIR should have compared the existing traffic without the mining operation permitted under the previous conditional use permit. The court found that the EIR “appropriately assume[d] the existing traffic impact level to be the traffic generated when the mine operates at full capacity pursuant to the entitlement previously permitted....” (242). Additionally, the court found that “[d]iscussing the possible environmental effects of the project based on actual traffic counts would have been misleading and illusory under the facts here. The flow of traffic for a mining operation fluctuates considerably based on need, capacity and other factors.” (243). The mine in *Fairview* like the racetrack on the Project Site fluctuates seasonally and because of other factors over time. This is one of the variables that should be considered when determining the appropriate existing use credit for the site.

Additionally, as stated above, the baseline environmental setting must be premised on realized physical conditions—not merely a hypothetical scenario. A review of the historic daily Hollywood Park Racetrack attendance records during live racing seasons shows that from 2000 through 2006, the highest weekday attendance was 23,609 patrons, and the highest weekend attendance was 29,151 patrons, while the lowest weekday attendance was 782 patrons and the lowest weekend attendance was 5,017 patrons. During the period from 1989 through 2006, the daily attendance records during live racing indicate that the highest and lowest weekday attendance at Hollywood Park was 42,612 and 312, respectively, while the highest and lowest weekend attendance during the same period was 51,151 and 5,017, respectively. Further, page 22 of the General Plan, Circulation Element, notes that Hollywood Park is a destination of a significant number of vehicles, accommodating approximately 40,000 vehicles and over 50,000 patrons. Given the documented, actual physical conditions on the Project Site over time, the weekday and weekend trip generation credits analyzed in the Traffic Impact Study are therefore reasonable given that there are documented days where there were more trips than the credit level taken in the Draft EIR. For purposes of the attendance credits, the Traffic Impact Study reasonably assumed a weekday attendance of 10,000 patrons and weekend attendance of 15,000 patrons. These attendance levels represented approximately half of the peak recorded attendance in the past and were well below the attendance level as documented

in the Circulation Element of the Inglewood General Plan.

In light of the comment provided regarding racetrack attendance levels, an updated traffic impact analysis has been prepared utilizing the 85th percentile racetrack attendance as recommended by the commenter for trip generation credits to be applied to the proposed project. Based on a review of the racetrack attendance records from 2000 to 2006 (as summarized in Appendix B-2 of the Draft EIR Traffic Impact Study), the 85th percentile attendance represents approximately 8,700 weekday and 12,200 weekend attendees. It should be noted that if the "straight line" credit methodology were applied to the 85% attendance figures, the trip credit would have been more than twice what is assumed in the updated traffic analysis.

In addition to the racetrack attendance, traffic impact analysis was also updated to incorporate more recent information with respect to the related development projects in the area. First, an initial study for the Inglewood Promenade Project (included as Related Project No. I-1 in the Draft EIR Traffic Impact Study, located at the southeast corner of Prairie Avenue and Century Boulevard) was recently prepared in August 2008. As a result, it is appropriate to update the analysis to reflect land use and project descriptions consistent with the initial study. Secondly, the Home Stretch project (included as Related Project No. I-19 in the Draft EIR Traffic Impact Study, located at the southeast corner of Prairie Avenue and Pincay Drive) continues to remain inactive with no planning applications or project actions filed with the City of Inglewood during the past three years. Therefore, this project has been removed from the updated list of related projects. There are still other projects on the list that also have not filed for a planning application, and thus the analysis remains conservative. The results of the updated traffic impact analysis which incorporated the 85th percentile racetrack attendance and the related projects updates have been summarized in a Technical Memorandum, (prepared by LLG Engineers, dated February 14, 2009) and are included in Appendix K-1 of the Final EIR.

As summarized in Table 6 of the Technical Memorandum, no additional project-related impacts (besides those already identified in the Draft EIR Traffic Impact Study) would result in the updated traffic impact analysis. In addition, no additional cumulative impacts (besides those already identified in the Draft EIR Traffic Impact Study) would result. As the results of the updated traffic impact analysis utilizing the 85th percentile racetrack attendance do not result in any new significant transportation impacts, the conclusions reported in the Draft EIR Traffic Impact Study remain valid.

COMMENT 20.4

Some of traffic counts used as the basis for their assumptions appear to be missing from the appendices, specifically counts from June and July 2006.

RESPONSE 20.4

All the traffic counts as noted by the commenter that were conducted in June and July 2006 were included in Appendix A – Manual Traffic Counts, of the Draft EIR Traffic Impact Study.

COMMENT 20.5

There is no basis for the assumption that the outbound casino traffic will equal the inbound traffic from the horse racing. This appears to result in low inbound traffic volumes based on the relative “split” between the inbound and outbound traffic volumes.

RESPONSE 20.5

Refer to Response to Comment 20.2 for additional clarification and discussion regarding the methodology and assumptions utilized in the development of traffic forecasts associated with the existing uses. Contrary to the commenter's assertion, the outbound bound casino traffic is assumed to be the same as the inbound casino traffic. The traffic impact study assumed that during the PM peak hour, the inbound driveway traffic counts collected under the “Without Live Racing” condition are mostly associated with the casino component because the racetrack is not open for live racing and the facility is near closing and that additional attendees going to the racetrack for off-track betting were not likely during this time. The traffic impact study further assumed that the directional inbound and outbound distribution for casino uses during the weekday PM peak hour is approximately equal (i.e., approximately 50% inbound and approximately 50% outbound). The basis for this assumption was provided in the article “Recalibration of Trip Generation Model for Las Vegas Hotel/Casinos” from the May 2002 edition of the ITE Journal. If more traffic were to be attributed to the racing related uses, the credit calculation would have yielded a higher credit, therefore the analysis errs on the conservative side.

COMMENT 20.6

It was assumed that 20% of the daily traffic occurs during the PM peak hour. This seems very high and would lead to a greater “credit” that might otherwise be expected. 20% was also assumed for the midday peak. There did not appear to be any back-up data to support these assumptions.

RESPONSE 20.6

Refer to Response 18.3 for the detailed response to this comment.

COMMENT 20.7

Internal Capture: Tables 6-2 and 6-3 show internal capture rates based on ITE's “Trip Generation Handbook”. (sic) Some of these percentages seem high especially the general office category at 20%. This previous comment was not addressed by the additional information as had been discussed by the applicant. Specifically there are no calculations to show the basis for this reduction.

RESPONSE 20.7

Refer to Response 18.4 for the detailed response to this comment.

COMMENT 20.8

Pass-By Capture: Table 6-2 and 6-3 also shows a pass-by capture rate of 23%. This previous comment was not addressed by the additional information as had been discussed by the applicant. Specifically there are no calculations to show the basis for this reduction.

RESPONSE 20.8

Refer to Response 18.5 for the detailed response to this comment.

COMMENT 20.9

Construction Traffic Trip Generation: If we assume that 200,000 tons of existing building materials must be removed from the site that the statement that “...up to 50 truck trips per day are anticipated.” is probably inaccurate. Based on the information provided in the study 50 trucks/day x 20 tons/truck x 22 workdays/month x 6 months = 132,000 tons, not 200,000. The truck traffic would have to be on the order of 76 trucks per day to remove the debris as stated. Also the trip generation rates for construction workers, i.e., .36 worker vehicle trips/day for residential development and 0.32 worker vehicle trips/day for commercial development seems low. Is there any back up data for this assumption? This previous comment was not addressed by the additional information as had been discussed by the applicant. Specifically there are no calculations to show the basis for this reduction.

RESPONSE 20.9

Refer to Response 18.10 for the detailed response to this comment.

COMMENT 20.10

Walker Parking Study: I didn't receive any back up documentation for the Walker parking study.

RESPONSE 20.10

Refer to Responses to Comment Letter 17 for a discussion regarding the shared parking methodology in the Walker Parking Study. Additionally, the Walker Parking Study is included as Appendix G-2 to the Draft EIR.

COMMENT LETTER No. 21

County of Los Angeles Fire Department
Frank Vidales, Acting Chief, Forestry Division,
Prevention Services Bureau
January 26, 2009.

COMMENT 21.1

DRAFT ENVIRONMENTAL IMPACT REPORT, THE 238-ACRE HOLLYWOOD PARK REDEVELOPMENT PROJECT SITE, INGLEWOOD (FFER #200800283)

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We have previously reviewed this project and have the following corrections and comments:

RESPONSE 21.1

This comment introduces the Fire Department's comments and does not require a direct response. All of the Fire Department's comments are listed and responded to below as Comments 21-2 through 21-26.

COMMENT 21.2

ENVIRONMENTAL SETTING

2. The third sentence should read "The Los Angeles County Fire Department operates 9 divisions, 21 battalions, 169 Fire Stations and 10 fire suppression camps for 58 district cities and all unincorporated areas of Los Angeles County."

RESPONSE 21.2

Comment noted. The Additions and Corrections Section of the Final EIR has been amended to reflect this change in conditions. Specifically, the third sentence of the first paragraph under the heading Environmental Setting on page IV.K-15 of the Draft EIR shall be revised as follows: "The LACoFD operates 9 divisions, 21 battalions, ~~465-169~~ fire stations and 10 fire suppression camps for 58 district cities and all unincorporated areas of within the County of Los Angeles." This change provides an update to the current operating conditions of the LACoFD and does not affect the findings or conclusion statements of the EIR.

COMMENT 21.3

FIRE STATIONS

3. Paragraph 1, the second sentence states "As of March 2006, Battalion 20 employed approximately 75 full-time staff among the five Fire Stations within the City." is incorrect. The sentence should read "Battalion 20 employed approximately 21 full-time daily staffing among the four Fire Stations within the City."

RESPONSE 21.3

Comment noted. The Additions and Corrections Section of the Final EIR has been amended to reflect this change in conditions. Specifically, the second sentence of the first paragraph under the subheading Fire Stations on page IV.K-15 of the Draft EIR shall be revised as follows: Battalion 20 employed approximately ~~75-21~~ full-time daily staffing among the ~~five-four~~ Fire Stations within the City.” This change provides an update to the current operating conditions of the LACoFD and does not affect the findings or conclusion statements of the EIR.

COMMENT 21.4

4. Paragraph 1: The third sentence provides incorrect response to distances to the project site from all the four Fire Stations.

RESPONSE 21.4

Comment noted. The correct distances are noted in responses to comments 21.5 through 21.8, below.

COMMENT 21.5

5. Fire Station 170 is approximately 1 mile from the project’s vehicle access point at Century Blvd and Yukon Avenue.

RESPONSE 21.5

Comment noted. The correct distance to Station 170 is noted in the Additions and Corrections Section of the Final EIR.

COMMENT 21.6

6. Fire Station 171 is approximately 1.5 miles from the project’s vehicle access point at Prairie and Arbor Vitae.

RESPONSE 21.6

Comment noted. The correct distance to Station 171 is noted in the Additions and Corrections Section of the Final EIR.

COMMENT 21.7

7. Fire Station 172 is approximately 2 miles from the project’s vehicle access point at Prairie and Arbor Vitae.

RESPONSE 21.7

Comment noted. The correct distance to Station 172 is noted in the Additions and Corrections Section of the Final EIR.

COMMENT 21.8

8. Fire Station 173 is approximately .75 miles from the project's vehicle access point at Cullen off Pincay Drive

RESPONSE 21.8

Comment noted. The correct distance to Station 173 is noted in the Additions and Corrections Section of the Final EIR.

COMMENT 21.9

9. Paragraph 2, also states the incorrect distance from Fire Station 173, which is approximately .75 miles from the project site. This paragraph further goes on to state that Fire Station 170 is equipped with a 3-person engine company and a 2-person paramedic squad which is incorrect. Fire Station 170 has an assessment light force consisting of a 4-person truck and a 2-person engine company responding as a unit, with one Fire Fighter paramedic on board and some limited paramedic capabilities.

RESPONSE 21.9

This comment is noted for the record. The information cited in the EIR reflects the conditions that were provided to the City by the LACoFD in prior correspondences and in their response to the NOP. Pursuant to Section 15125 of the State CEQA Guidelines, the EIR must include a description of the physical environmental conditions in the vicinity of the project site as they exist at the time the Notice of Preparation is published. LACoFD's response to the NOP dated January 15, 2008 verified that the information previously provided to the EIR preparer's was still valid. Nevertheless the updated information will be incorporated into the Additions and Corrections Section of the Final EIR. The updated information does not affect the findings and conclusions of the projects impact statement with respect to fire protection services.

COMMENT 21.10

10. Paragraph 2: The last sentence of this paragraph is misleading and should be deleted. The Los Angeles County Fire Department (LACoFD) operates under a regional concept in its approach to providing fire protection and emergency medical services, wherein emergency response units are dispatched as needed to an incident anywhere in the District service territory based on distance and availability, without regard to jurisdictional or municipal boundaries.

RESPONSE 21.10

Comment noted. This deletion has been incorporated into the Additions and Corrections Section of the Final EIR.

COMMENT 21.11

11. Paragraph 3: The first sentence, “while the LACoFD does have automatic aid agreements with other agencies, they would not be applicable to the project area. Furthermore, mutual aid is provided by one fire protection agency to another upon request during major emergencies, and is not intended to provide supplemental fire protection resources on a daily basis.

RESPONSE 21.11

The description of the LACoFD’s mutual aid agreements with other fire agencies is adequately discussed in the Draft EIR. This information was obtained in the City’s of Inglewood General Plan Update Technical Background Report and does not indicate that mutual aid agreements are provided to supplement fire protection resources on a daily basis.

COMMENT 21.12

12. Paragraph 3: The second, third and fourth sentences of this paragraph paint an inaccurate picture of the LACoFD delivery of service and should be deleted. As we have stated above, the LACoFD provides fire protection and emergency medical services under a regional concept, wherein emergency response units are dispatched as needed to an incident anywhere in the District service territory based on distance and availability, without regard to jurisdictional or municipal boundaries.

RESPONSE 21.12

The description of the LACoFD’s mutual aid agreements with other fire agencies is adequately discussed in the Draft EIR. This information was obtained in the City’s of Inglewood General Plan Update Technical Background Report and does not indicate that mutual aid agreements are provided to supplement fire protection resources on a daily basis.

COMMENT 21.13**RESPONSE TIME**

13. We have updated the Fire Department’s response times as follows: In 2007, Inglewood had an average emergency response time for first arriving units of 4.23 minutes. The average non-emergency response time for first arriving units was 6.2 minutes.

RESPONSE 21.13

This comment is noted for the record. The updated response times for 2007 will be included in the Additions and Corrections Section of the Final EIR.

COMMENT 21.14

ENVIRONMENTAL IMPACT – METHODOLOGY

14. Our previous correspondence dated September 5, 2007, as cited in this section, stated “Fire protection serving the area was adequate for the existing development/land use at the time the City of Inglewood entered into a service agreement with the County in 2000. However, each additional development has created greater demands on existing resources.

RESPONSE 21.14

This comment is noted for the record. As noted in the EIR the cumulative impacts of the proposed project in conjunction with related developments within the City and surrounding areas would increase the demand for fire protection services in the Proposed Project area. Specifically, there would be increased demands for additional LACoFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (i.e., property taxes, the City’s Annual Fee, government funding), to which the Proposed Project and related projects would contribute.

COMMENT 21.15

15. The project proposes up to six million square feet of residential, commercial, and hotel uses. A development of this magnitude will significantly impact service demands on the existing resources.

RESPONSE 21.15

This comment is noted for the record and will be forwarded to the decision makers for their consideration. Mitigation measures IV.K.2-1 through IV.K.2-6 are proposed to reduce the project’s impacts upon fire protection services. As concluded in the Draft EIR, the Project’s increased demands upon fire protection services would be mitigated to a less than significant level after mitigation.

COMMENT 21.16

16. The City of Inglewood contracts with the Consolidated Fire Protection District of Los Angeles County (commonly known as the Los Angeles County Fire Department/LACoFD) for fire protection and emergency medical services. The current methodology for calculating the City’s Annual Fee, as well as impacts on existing resources, would need to be reviewed, and the City’s Annual Fee increased based upon the service demands created by this project.

RESPONSE 21.16

This comment is noted for the record and will be forwarded to the decision makers for their consideration. No additions or corrections to the Draft EIR are warranted.

COMMENT 21.17

17. Changes in staffing and cost apportionment must be done in accordance with the Agreement for Services by and between the Consolidated Fire Protection District of Los Angeles County and the City of Inglewood dated April 4, 2000 (Service Agreement).

RESPONSE 21.17

This comment is noted for the record and will be forwarded to the decision makers for their consideration. No additions or corrections to the Draft EIR are warranted.

COMMENT 21.18**IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT**

18. The sentence that states “No impacts associated with fire protection services were identified in the Initial Study to be less than significant” is confusing. To be clear, the Project will have significant impact on fire protection services that must be mitigated by the City of Inglewood through an Amendment to the Service Agreement.

RESPONSE 21.18

This comment is correct. As concluded in the Draft EIR, the Project’s increased demands upon fire protection services were identified and analyzed in the EIR. The project’s impact upon fire protection services would be mitigated to a less than significant level after mitigation.

COMMENT 21.19**OPERATION RESPONSE DISTANCE AND EMERGENCY ACCESS**

19. The scenario provided in this section relating to response distance is not used by the LACoFD to determine the adequacy of fire protection services. The LACoFD uses the national guidelines of a 5-minute response time for the 1st arriving unit for Fire and EMS responses and 8-minutes for advance life support (paramedic) units in urban areas.

RESPONSE 21.19

The national guidelines referenced in this comment were accurately summarized on page IV.K-17 of the Draft EIR. Accordingly, this comment does not warrant any corrections to the Draft EIR section.

COMMENT 21.20

20. Fire Station 173, which is the jurisdictional station for this project, is approximately .75 miles from the project site. It has a 3-person engine company and a 2-person paramedic squad

RESPONSE 21.20

This comment is noted for the record. The correct distance to Fire Station 173 is noted in the Additions and Corrections Section of the Final EIR (See also response to comment 21.8.) With regard to the staffing levels at Station 173, the information cited in the EIR reflects the conditions that were provided to the City by the LACoFD in prior correspondences and in their response to the NOP. Pursuant to Section 15125 of the State CEQA Guidelines, the EIR must include a description of the physical environmental conditions in the vicinity of the project site as they exist at the time the Notice of Preparation is published. LACoFD's response to the NOP dated January 15, 2008 verified that the information previously provided to the EIR preparer's was still valid. While the revised conditions are noted for the record, they do not warrant any corrections to the Draft EIR section.

COMMENT 21.21

21. Based on the distance to the project site, Engine 173 and Paramedic Squad 173 (advanced life support) are estimated to have an emergency response time of 2.5 minutes, which are well within the guidelines for Fire and EMS 1st responses.

RESPONSE 21.21

This comment is noted for the record. This comment provides supplemental information that confirms the Draft EIR's conclusion that impacts related to response time would be less than significant.

COMMENT 21.22**CUMULATIVE IMPACTS**

22. Paragraph 1: The last sentence states "This need would be funded via existing mechanisms (i.e., property taxes, government funding), to which the Proposed Project and related projects would contribute." is incorrect. The City of Inglewood contracts with the LACoFD for fire protection and emergency medical services. Any increased demands on LACoFD services would have to be addressed in the City's Annual Fee.

RESPONSE 21.22

Comment noted. The Additions and Corrections Section of the Final EIR will be revised accordingly. Specifically, the last sentence of the first paragraph will be revised as follows: "This need would be

funded via existing mechanisms (i.e., property taxes, the City's Annual fee, government funding), to which the Proposed Project and related projects would contribute.”

COMMENT 21.23

LEVEL OF SIGNIFICANCE AFTER MITIGATION

23. Project impacts on fire protection services must be mitigated to a less than significant level by the City of Inglewood through the Service Agreement.

RESPONSE 21.23

As noted in Section IV.K-2, Fire Protection, in the Draft EIR, project impacts upon the Los Angeles County Fire Department can and will be mitigated to a less than significant level through the implementation of MM IV.K.2-1 through MM IV.K.2-6.

COMMENT 21.24

LAND DEVELOPMENT UNIT:

1. We have no comments at this time.

RESPONSE 21.24

This comment acknowledges the Land Development Unit has no comments at this time. No response is required.

COMMENT 21.25

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

RESPONSE 21.25

This comment identifies the areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed. No further response is required.

COMMENT 21.26

HEALTH HAZARDOUS MATERIALS DIVISION:

1. We have no comments at this time. If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

Frank Vidales, Acting Chief Forestry Division

Prevention Services Bureau

RESPONSE 21.26

This comment acknowledges the Health Hazardous Materials Division has no comments at this time. No response is required.

V. MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM (“MMRP”) PROCEDURES

Section 21081.6 of the Public Resources Code requires a lead agency to adopt a “reporting or monitoring program for the changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment” (Mitigation Monitoring and Reporting Program, Section 15097 of the CEQA Guidelines provides additional direction on mitigation monitoring or reporting). The City of Inglewood is the Lead Agency under CEQA for the Proposed Project.

This Mitigation Monitoring and Reporting Program is designed to monitor implementation of all project design features and mitigation measures which have been adopted for the proposed Hollywood Park Redevelopment Project. As shown in the following pages, each required mitigation measure and project design feature for the Project is listed and categorized by impact area, with accompanying notation of:

- Monitoring Phase, the phase of the project during which the mitigation measure shall be monitored
- The Implementation Party, the party responsible for implementing the mitigation measure
- The Enforcement Agency, the agency with the power to enforce the mitigation measure.
- The Monitoring Agency, the agency to which reports involving feasibility, compliance, implementation and development are made.

The MMRP for the Hollywood Park Redevelopment Project will be in place throughout all phases of the Project. The City’s existing planning, engineering, review and inspection processes will be used as the basic foundation for the MMRP procedures and will also serve to provide the documentation for the reporting program.

The substance and timing of each certification report that is submitted to the City shall be at the discretion of the City. Generally, each report will be submitted to the City in a timely manner following completion/implementation of the applicable mitigation measure and project design feature, and shall include sufficient information to reasonably determine whether the intent of the measure has been satisfied. The City, in conjunction with the Project Applicant, shall assure that project construction occurs in accordance with the MMRP. The South Coast Air Quality Management District (SCAQMD) shall be responsible for the implementation of corrective actions relative to violations of SCAQMD rules associated with mitigation. Departments listed in the MMRP are all departments of the City of Inglewood unless otherwise noted.

