

---

---

### 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: “90<sup>th</sup> 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



0 300 600 900 1200  
Feet

Source: Google Earth, 2007.



CHRISTOPHER A. JOSEPH & ASSOCIATES  
Environmental Planning and Research

Figure II-2 [REVISED]  
Aerial Photograph











- 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**

<b>Greenhouse Gas</b>	<b>Global Warming Potential</b>
Carbon Dioxide (CO <sub>2</sub> )	1
Methane (CH <sub>4</sub> )	21
Nitrous Dioxide (N <sub>2</sub> O)	310
Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs)	6,500
Sulfur Hexafluoride (SF <sub>6</sub> )	23,900

*Source: BAAQMD Source Inventory of Bay Area Greenhouse Gas Emissions. November 2006.*

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 CO<sub>2</sub>e.”

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	<del>25</del> <u>2,474</u>
Electricity	9,507
Total Existing	<del>40,248</del> <u>42,679</u>
Project	
Mobile	65,994
Natural Gas	15,121
Electricity	12,360
Total Project	93,475
Net	<del>53,227</del> <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 PM<sub>10</sub> 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<sub>x</sub>, CO, PM<sub>2.5</sub>, and PM<sub>10</sub> impacts during operations. Basin is a non-attainment area under the CCAA for O<sub>3</sub> and the proposed project would exceed the regional daily emissions threshold for ozone precursors, VOC and NO<sub>x</sub>. The Basin is also a non-attainment area under the CCAA for PM<sub>2.5</sub> and PM<sub>10</sub> and the proposed project would exceed the regional daily emissions thresholds for PM<sub>2.5</sub> and PM<sub>10</sub>. The proposed project would potentially increase the~~

frequency of O<sub>3</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> 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

No changes to this Section of the DEIR are required.

#### 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:

“<sup>a</sup> 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
<b><i>Principal 1: Improve mobility for all residents</i></b>	
<p>Encourage transportation investments and land use decisions that are mutually supportive.</p>	<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 97<sup>th</sup> 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>

**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><b><i>Principal 2: Foster livability in all communities</i></b></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 &amp; Employment, horseracing in California is a declining business industry largely due to increased competition for the publics' 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><b>Principal 3: Enable prosperity for all people</b></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><b><i>Principal 4: Promote sustainability for all generations</i></b></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 &amp; 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>	
Encourage neighborhood stability and conservation by reducing the amount of land designated for high density development.	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.
Promote the maintenance, rehabilitation, and modernization of the City’s housing stock.	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.



**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 &amp; 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><b><i>Circulation</i></b></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"><b>Community Facilities</b></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 &amp; 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 <sup>a</sup> (lbs/unit/day)	Total (Pounds/Day)
<b>Existing Uses</b>			
Main Building/Grandstand	594,000	.006	3,564
Pavilion <sup>b</sup>	<del>280,000</del> <u>321,000</u>	.005	<del>1,400</del> <u>2,000</u>
		<i>Subtotal</i>	<b><del>4,964</del> <u>5,564</u></b>
<b>Proposed Project</b>			
Residential	2,995 units	4.00 lbs/unit/day	11,980
HOA Facility	10,000 sf	0.006 lbs/sf/day	60
Office/Commercial	75,000 sf	0.006 lbs/sf/day	450
Retail	620,000 sf	0.005 lbs/sf/day	3,100
Casino/OTB	120,000 sf	0.005 lbs/sf/day	600
Hotel			
Rooms	300 rooms	2.0 lbs/room/day	600
Meeting Space	20,000 sf	0.006 lbs/sf/day	120
Civic Use <sup>c</sup>	4 AC	0.007 lbs/sf/day	515
Open Space	25 AC	--	--
		<i>Subtotal</i>	<b><i>17,425</i></b>
		<b>Net Total</b>	<b><del>12,461</del> <u>11,861</u></b>
<sup>a</sup> Generation Rates based on City of Los Angeles Department of Public Works, Bureau of Sanitation Solid Waste Generation, 1981. Uses not listed are estimated by the closest type of use available in the table. <sup>b</sup> Does not include the Pavilion outdoor seating area which has been abandoned and is not in use. <sup>c</sup> Based on California Department of Education, 2000, Guide to School Site Analysis and Development. A 4-acre school site could be developed with a 73,600 sf school with 800 students (92 sf/pupil). Source: Christopher A. Joseph & Associates, <del>July 2007</del> <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.~~<sup>6</sup>

<sup>6</sup>~~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-92<sup>nd</sup> 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 85<sup>th</sup> 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 85<sup>th</sup> 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 90<sup>th</sup> percentile attendance. If attendance records from 1989 through 2006 are utilized, the 8,700 weekday attendance would represent a 65<sup>th</sup> 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**

The second point under the second bullet will be amended to read, “~~Technical~~ Inconsistency with the Air Quality Management Plan.”

#### **VI. ALTERNATIVES TO THE PROPOSED PROJECT**

##### **VI.A. 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.