



MARK PESTRELLA, Director

COUNTY OF LOS ANGELES

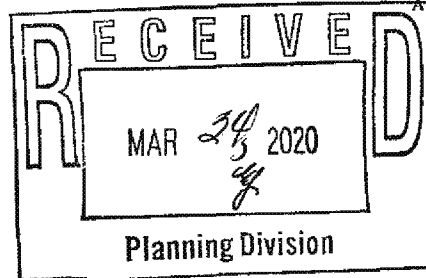
DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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March 19, 2020



IN REPLY PLEASE
REFER TO FILE: LD-4

Ms. Mindy Wilcox
AICP, Planning Manager
City of Inglewood, Planning Division
1 West Manchester Boulevard, 4th Floor
Inglewood, CA 90201

Dear Ms. Wilcox:

DRAFT ENVIRONMENTAL IMPACT REPORT (RPPL2019007632) INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER CITY OF INGLEWOOD

Thank you for the opportunity to review the proposed project's Draft Environmental Impact Report (DEIR). The project would consist of an arena, approximately 915,000 square feet designed to host the Los Angeles Clippers basketball team with up to 18,000 fixed seats for the National Basketball Association games. The arena could also be configured with up to 500 additional temporary seats for events such as family shows, concerts, conventions, corporate events, and non-LA Clippers sporting events.

For specific revisions, additions, or deletions of wording directly from the project document the specific section, subsection, and/or item along with the page number is first referenced then the excerpt from the document is copied within quotations using the following nomenclature:

Deletions are represented by a strikethrough.
Additions are represented by *italics* along with an underline.
Revisions are represented by a combination of the above.

1. General Comments

- A. The DEIR should disclose the following County proposed traffic enhancements in Westmont-West Athens:
- The leading pedestrian intervals at the intersections of Century/Van Ness and Normandie/Century.

- Curb extensions at Century Boulevard/Gramercy Place (Intersection #51) at the southeast and northeast corners. Note that although these curb extensions will not impede right-turning vehicles, please include a comment to the consultant to ensure that defacto right turn lanes were not assumed at this intersection in their line-of-sight calculations.
- B. The DEIR should disclose the following potential County traffic enhancements in Lennox:
- The leading pedestrian intervals at the intersections of Lennox/Inglewood, Lennox/Hawthorne, 111th/Hawthorne, Lennox/Freeman, 104th/Inglewood, and 104th/Hawthorne.

For questions regarding comment No. 1, please contact Andrew Ross of Public Works, Transportation Planning and Programs Division, at (626) 300-4586 or aross@pw.lacounty.gov.

2. 3.7 Greenhouse Gas Emissions, 3.7.3 Regulatory Setting, 2017 Climate Change Scoping Plan Update, page 3.7-14 to 15:

The following revision should be made:

"SB 1383, which requires a 50 percent reduction in anthropogenic black carbon and a 40 percent reduction in hydrofluorocarbon and methane emissions below 2013 levels by 2030, where methane emission reduction goals include a 75 percent reduction in the level of statewide disposal of organic waste from 2014 levels by 2025; and"

For questions regarding comment No. 2, please contact Nilda Gemeniano of Public Works, Environmental Programs Division, at (626) 458-5184 or ngemenia@pw.lacounty.gov.

3. Hydrology and Water Quality, 3.9.1 Environmental Setting, Flooding, page 3.9-8 to 9:

The document should clarify that the 100-year flood has a 1 percent chance of occurring in any given year and the 500-year flood has a 0.2 percent chance of occurring in any given year.

4. 3.9 Hydrology and Water Quality, 3.9.3 Regulatory Setting, Federal, page 3.9-13 to 14:

The document should clarify that the Code of Federal Regulations discussed is set forth by the National Flood Insurance Program's development standards for projects within floodplains.

5. 3.9 Hydrology and Water Quality, Impact and Mitigation (Impact 3.9-3), Analysis, page 3.9-29 to 30:

The document should clarify the rainfall frequency used in the runoff analysis. It is different than those of FEMA.

For questions regarding comment Nos. 3 to 5, please contact Jason Rietze of Public Works, Storm Water Planning Division, at (626) 300-3248 or jrietze@pw.lacounty.gov.

6. 3.14 Transportation and Circulation, 3.14.1 Environmental Setting, Operation, page 3.14-19 to 34:

Tables 3.14-7 and 3.14-8 should note the following intersections as either shared jurisdiction with the County or entirely within the County:

- Intersection #50 – Century Boulevard and Van Ness Avenue
- Intersection #66 – Lennox Boulevard and Freeman Avenue
- Intersection #74 – Hawthorne Boulevard and Westbound 105 off-ramp

7. Summary, Summary Table S-2, 3.14 Transportation and Circulation (b), page S 87:

Clarify the type of pedestrian flow management that will be used. The document should note the type of proposed management, particularly in the southwest corner of the proposed project site.

For questions regarding comment Nos. 6 and 7, please contact Andrew Ross of Public Works, Transportation Planning and Programs Division, at (626) 300-4586 or aross@pw.lacounty.gov.

8. 3.14 Transportation and Circulation, No. 3.14.4 Analysis Impacts and Mitigation through 3.14.5 Analysis Impacts and Mitigations with Concurrent Events:

The DEIR only considers line of sight E or F results as significant; however, multiple County intersections have significant impacts at LOS D, C, etc, thresholds. Please include/denote these as significant impacts as well and then address them in the mitigation section.

- Please use the enclosed ICU methodology for all signalized intersections and unsignalized intersections within or shared with the County.
- Address mitigations for each County-impacted intersection.
- Provide an event management plan to Public Works for review.

For questions regarding comment No. 8, please contact Kent Tsujii of Public Works, Traffic Safety and Mobility Division, at (626) 300-4776 or ketsujii@pw.lacounty.gov.

9. 3.15 Utilities and Service Systems, 3.15.16 Impact and Mitigation (Impact 3.15.11), Operation, page 3.15-80 to 81:

The document should clarify how the venue will comply with existing Assembly Bill 1826 (2014) law and future pending organic waste regulations per State Bill 1383 (2016). By the time the project is constructed, on-site facilities are expected to generate organic waste and will need to have systems in place to recycle their organic waste. Per State Bill 1383 regulations, the venue may be required to implement a food recovery program as a Tier 2 edible food waste generator.

10. 3.15 Utilities and Service Systems, 3.15.15 Regulatory Setting, State, page 3.15-75 to 76:

The following revision should be made:

"AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 past the year 2000. ~~AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation.~~ The City of Inglewood's City-wide diversion rate per AB 939 was 62 percent in 2010."

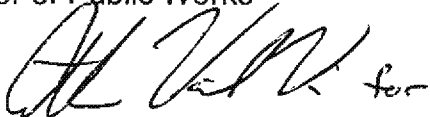
Ms. Mindy Wilcox
March 19, 2020
Page 5

For questions regarding comment Nos. 9 and 10, please contact Nilda Gemeniano of Public Works, Environmental Programs Division, at (626) 458-5184 or ngemenia@pw.lacounty.gov.

We request the opportunity to review the future environmental document for this project when it is available. If you have any questions or require additional information, please contact Jose Suarez of Public Works, Land Development Division, at (626) 458-4921 or jsuarez@pw.lacounty.gov.

Very truly yours,

MARK PESTRELLA
Director of Public Works

Handwritten signature of Anthony Nyivih in black ink, appearing as a stylized cursive script.

ANTHONY NYIVIH
Assistant Deputy Director
Land Development Division

JDC:kt

BPCHECK\PLAN\CHECKING\FILES\PROJECTS\SUBMITTED\BY\OTHER\AGENCIES\SR\PL2019007632\INGLEWOOD\BASKETBALL\AND\TERT,CENTER\DPW\NOT\CLEARED\2020-2-3.

Enc.

Signalized Intersection (ICU Methodology)

ICU Level of Service	
LOS	V/C Ratio
A	0.00 – 0.60
B	0.61 – 0.70
C	0.71 – 0.80
D	0.81 – 0.90
E	0.91 – 1.00
F	> 1.00

ICU Significant Impact		
Pre-Project LOS	V/C Ratio	Project V/C Increase
A/B	0.00 – 0.70	Causing up to 0.75
C	0.71 – 0.80	≥ 0.04 (4%)
D	0.81 – 0.90	≥ 0.02 (2%)
E/F	0.91 or more	≥ 0.01 (1%)

Unsignalized Intersection (HCM Methodology)

HCM Level of Service	
LOS	Delay (sec/veh)
A	0 to 10
B	>10 to 15
C	> 15 to 25
D	> 25 to 35
E	> 35 to 50
F	> 50

HCM Significant Impact		
Pre-Project LOS	Delay (sec/veh)	Project Significant Impact
A/B/C	0 to 25	Causing LOS D or worse
D	> 25 to 35	5.0 seconds delay increase
E/F	> 35	2.5 seconds delay increase

Source: LA County Traffic Impact Analysis Report Guidelines (May 2007).