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March 24, 2020

Mindy Wilcox, AICP
City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301
Sent by Email: ibecproject@cityofinglewood.org

RE: Inglewood Basketball and Entertainment Center (IBEC)
Draft Environmental Impact Report (DEIR) – Metro Comments

Dear Ms. Wilcox:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Inglewood Basketball and Entertainment Center (Project) located in the City of Inglewood (City). Metro is committed to working with the City on transit-supportive developments and planning efforts to grow ridership and reduce driving.

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with comments on the Draft Environmental Impact Report (EIR) for the Project. Specifically, this letter provides comments regarding the Project's potential impacts on Metro services and facilities which should be analyzed in the EIR and provides recommendations for mitigation measures and project design features, as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

Metro recognizes the Project's significance to the City and the greater Los Angeles County region. Metro and the City have been collaborating closely on several efforts, including implementation of the Crenshaw/LAX Project (K Line), transit-oriented development (TOD) specific plans, the Inglewood First/Last Mile Plan, the Centinela/Florence Grade Separation, and event transportation demand management for SoFi Stadium. We are committed to continuing a collaborative approach with respect to this Project. In particular, we appreciate the EIR consultation meeting held between our respective staffs on March 3, 2020. Looking ahead, we look forward to continuing coordination on rail and bus services serving the Project site, the operations of the proposed shuttle service, and other improvements to the Event Transportation Management Plan for the Project.

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

Project Description Summary

The Project area is bounded by West Century Boulevard on the north, South Prairie Avenue on the west, South Doty Avenue on the east, and an imaginary straight line extending east from West 103rd Street to South Doty Avenue to the south. The Project includes an approximately 915,000-square foot (sf) Arena Structure design to host the LA Clippers basketball team with up to 18,000 fixed seats for National Basketball Association (NBA) games. A six-story parking structure containing 3,110 parking spaces would be located within the West Parking Garage Site. The East Transportation and Hotel Site would include a parking garage (365 spaces) and transportation hub to accommodate private vehicle parking. The Project would also include a limited-service hotel use with up to 150 rooms and an approximately 1.3-acre portion of the East Transportation and Hotel Site.

Comments on EIR Analysis

Section 2.5 – Project Description: Project Elements

Page 2-58, “Shuttle Service”: The narrative indicates that the Project would provide shuttle service connecting the Project site to Metro’s Hawthorne/Lennox Station (C Line - Green) and La Brea/Florence Station (K Line). The draft Event Transportation Management Plan (EIR Appendix K.4, p. 17) indicates that shuttle service would be provided from Metro’s Downtown Inglewood Station and possibly Aviation/Century Station along the K Line. Please review and revise to ensure consistency throughout the EIR. Metro’s recommendations on provision of shuttle service are provided below in the “Rail Operations Comments” section of this letter.

Section 3.14 - Transportation and Circulation

Page 3.14-47, “Fixed-Route Bus Service”: The narrative describes scheduling shakeups as occurring in December and July of each year. This should be corrected to December and June (not July). Also, shakeups include both minor and major changes (not just minor as the narrative describes).

Page 3.14-53, “Adjusted Baseline Transit Assumptions”: The narrative describes rail operating plan C-3 that was adopted by the Metro Board of Directors (Metro Board) as being a two year service plan; however, the Metro Board motion indicates the proscribed period is only one year (not two). See Board report as noted in EIR’s footnote.

Page 3.14-130, “Transit System Evaluation”: Metro C Line trains are typically two-car trains; however, service is shifted to one-car or two-car trains starting in the 9 PM hour each night on weekdays. The calculations of train capacity in Table 3.14-36 do not reflect this reduction for weekday night post-event time periods. Also, existing C Line schedules provide three trains an hour after 7 PM (one train every 20 minutes in each direction). During weekends, the C Line operates every 15 minutes with two-car trains during the day, and every 20 minutes with one-car or two-car trains in the evenings. C Line service and headways may or may not change once the K Line opens. Depending on resource availability such as rail cars, train operators, and budget, Metro Rail Operations may be able to keep two-car trains in service later than the 9 PM hour to accommodate post-event demand.

Also, please note that the K Line is being designed to provide service with three-car trains. However, platform lengths on segments of the existing C Line can only accommodate two-car train service. Metro is seeking grant funding from the State of California to extend platforms at four C Line stations. However, in the event that such grant funding is not secured, trains may be limited to two-car service which would limit their carrying capacity for events at the Project site.

Centinela/Florence Grade Separation

In January and February 2017, the Metro Board directed staff to conduct preliminary studies for a potential grade separation project for the K Line at the Centinela/Florence intersection. In mid-2020, Metro staff is expected to present the results of the studies and seek the Board's direction on proceeding with further engineering design and environmental clearance of this project. While funding and tentative construction timelines have not yet been identified by the Board for this project, the City and Applicant should be advised that construction of this project may coincide with construction of the Inglewood Basketball and Entertainment Center. For the duration of the grade separation construction, the K Line could have operational limitations and therefore may not provide the same level of service to the arena and other venues in the vicinity temporarily.

Bus Operations Comments

Service: Metro Bus Lines 211/215, 212/312, and 117 operate on West Century Boulevard and South Prairie Avenue, adjacent to the Project. Two Metro Bus stops are directly adjacent to the Project at West Century Blvd. and South Prairie Ave. Other transit operators may provide service in the vicinity of the Project and should be consulted. The Applicant should be aware of the bus facilities and services that are present and that transit services are likely to be expanded in the future to provide connections to the existing C Line and future K Line.

Bus Stop Locations: Bus stops located on the far side of the intersection are generally preferred over near side bus stops for Metro bus operations. This keeps the bus from being stopped twice by the same traffic signal. It also is safer because most bus passengers alighting at the stop will walk to the rear of the bus greatly reducing the potential for a bus versus pedestrian accident. Metro approves of the relocated North Prairie Ave bus stop from near side of Century Blvd to far side, as well as of the permanent location identified for the East Century bus stop far side of Prairie Ave.

During construction of the project, the City proposes to relocate temporarily the existing East Century/Prairie bus stop from far side of the intersection (southeast corner) to nearside (southwest corner) which is presently deficient in length to accommodate buses. This temporary relocation potentially creates a safety hazard and could adversely affect public transit operations (considered a significant environmental impact as described on EIR page 3.14-63). Metro requests that the bus stop instead temporarily be relocated further west to approximately 60 feet west of the Starbucks driveway, where more adequate space is available and ADA-compliant sidewalk access for bus riders can be provided. Construction of parking facilities on the parcel west of the Starbucks driveway may cause the temporary stop to be relocated from time to time, and we encourage ongoing communication with Metro prior to and throughout the construction process, as noted below.

ADA Access: In general, temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Non-compliant bus stops will not be served by Metro as it is a violation of passengers' civil rights under Federal law. Recommended bus stop design dimensions may be found in Appendix D of Metro's Transit Service Policy (attached).

Coordination During Project Construction: To facilitate coordination with Metro Bus Operations during Project construction in support of Mitigation Measure 3.14-15, Metro recommends that the following information be included in the Project's Construction Traffic Management Plan:

“The Applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro’s Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.”

Rail Operations Comments

Metro encourages event attendees and Project employees and staff to take transit to/from the Arena, and we look forward to continuing coordination between the City, Applicant, and Metro Rail Operations and Bus Service Planning on the development of the Event Transportation Management Plan (ETMP) for the Project. To ensure optimal operations and attendee experience, we note the following comments and recommendations, which should be incorporated into a revised ETMP and in other related Project plans as appropriate.

Funding for Augmented Rail Operations

As discussed in our coordination meeting (March 3, 2020), Metro would like to open discussions with the City and Applicant on assistance with identifying a long-term funding source for additional rail service and related costs to support events at the Project site. As noted below, Metro’s support of events will likely involve additional costs for more frequent rail service and associated personnel for logistics, law enforcement, and traffic control.

Shuttle Service

Rail stations served: We suggest that the shuttle service provide consolidated connections to no more than two (2) Metro Rail stations (likely Downtown Inglewood Station on the K Line, and Hawthorne/Lennox Station on the C Line). Limiting the service to two stations reduces the amount of workforce, logistics, law enforcement, traffic control and general support provided by Metro as well as by the Applicant. We recommend further discussion between Metro, the City, and Applicant on determining which stations should be served. Once the shuttle service is fully operational, we highly encourage the Applicant to coordinate with Metro’s Special Events Bus and Rail Team to meet demand and make changes to servicing rail stations with Metro’s input.

We also recommend that the Applicant leverage existing Metro Bus services that will already be connecting the Project site to Metro Rail stations as part of its overall ETMP strategy.

Shuttle Service provision: The EIR should describe/confirm, in the Project Description section and/or the Transportation and Circulation section:

- a) whether the shuttles will be a private bus service, funded and/or provided by the Applicant, or a municipal/public-provided service;
- b) the frequency of shuttles (headways) proposed for event days;
- c) whether fares for the shuttle will be free, paid, or TAP-card enabled.

Shuttle service hours and augmenting staff (law enforcement, traffic officers and general support) pre- and post-event should be extended on days with concurrent events at the Forum or SoFi Stadium to assist with excessive pedestrian and vehicle traffic.

Rail station/shuttle bus interface:

Curb space: Adequate curb space and/or bus berths should be allocated and designated for shuttle bus stops at each of the rail stations to be serviced. This is necessary to ensure safe and efficient service by shuttle buses and regular Metro Bus and Rail operations, as well as overall vehicular circulation. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at <https://www.metro.net/projects/systemwidedesign>.

Street Closures: Pre- and post-event planning may or may not require street closures and/or queuing of event attendees on the sidewalk (i.e., public right-of-way) to uniformly control crowds. The City and Applicant should coordinate with transportation and public works staff of local jurisdictions where the shuttle services is anticipated to connect to Metro rail stations within and outside the City of Inglewood (e.g. City of Hawthorne, City of Los Angeles, County of Los Angeles) to identify needs for allocation of curb space and sidewalks.

Staff Support: Additional traffic officers and law enforcement support should be provided by the Applicant at transfer locations between rail and the shuttle service (at street level, not Metro property) to mitigate pedestrian and vehicle conflicts at intersections and sidewalks on the day of the event.

Wayfinding: A robust and comprehensive master sign program and wayfinding signs (well-lit for nighttime events) should be implemented to direct attendees to the bus shuttles to and from the arena and at all shuttle stops.

Transit Ticketing: The Applicant should consider allowing Metro TAP/Revenue staff to sell Metro fare media (one way, roundtrip, and day passes) to attendees inside the arena or on the property to help alleviate overcrowding at rail station ticket vending machines after events.

Transit Supportive Planning: Recommendations and Resources

Metro would like to make the following recommendations to maximize the Project's potential synergies associated with transit-oriented development. This will support the Project's efforts to reduce vehicle trips as required by the Project's certification under Assembly Bill (AB) 987 by achieving a greater mode shift to transit and active transportation:

1. Active Transportation: Metro strongly encourages the Applicant to maximize the installation of Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations.
2. Bicycle Use and Micro-mobility Devices: The Project should provide adequate short-term bicycle parking for event attendees, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for employees. As proposed, the Project provides approximately 23 short-term spaces and 60 long-term spaces for bicycle parking, and potentially a bike valet (EIR p. 2-43; 2-44). The Association of Bicycle and Pedestrian Professionals (APBP) recommends that bicycle parking be provided to accommodate 2% of the seating capacity of an event venue (see APBP's *2010 Bicycle Parking Guidelines*).

Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred

spacing dimensions, so bicycle parking can be safely and conveniently accessed. If a bike valet is proposed, its location should be designated in Project plans.

Similar provisions for micromobility devices are also encouraged. Metro also encourages the City and Applicant to explore participation in the Metro Bike Share program.

3. First & Last Mile Access: The Project should maximize opportunities to improve first-last mile connections to and from Metro Rail stations, as described in the Inglewood First/Last Mile Plan which was adopted in February 2019. Please review this plan, located online at https://www.metro.net/projects/inglewood_flm/.
4. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.
5. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at <https://www.metro.net/riding/eapp/>.

If you have any questions or would like to discuss contents in this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address: Metro Development Review, One Gateway Plaza, MS 99-22-1, Los Angeles, CA 90012-2952.

Sincerely,


Shine Ling, AICP
Manager, Transit Oriented Communities

Attachment:

- 2015 Metro Transit Service Policy, Appendix D