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LADOT Case No. OUT 20-107261

March 24, 2020

Mindy Wilcox, Planning Manager
City of Inglewood, Planning Division
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Inglewood, California 90301

Subject: **INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER PROJECT – DRAFT
ENVIRONMENTAL IMPACT REPORT [SCH #2018021056]**

Dear Ms. Wilcox:

The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR), dated December 2019, for the proposed basketball and entertainment center generally located at the intersection of West Century Boulevard and South Prairie Avenue. Per the DEIR Project Description, the development would include construction of an 85,000 square-foot (SF) team practice and training facility, 25,000 SF sports medical clinic and 71,000 SF team office space, integrated into an arena structure that would accommodate an approximately 915,000 SF 18,000 fixed-seat arena. Contiguous to the Arena will be 48,000 SF of commercial space, 15,000 SF of community space, and a 650-space parking garage. The Project will also include a 150-guest room hotel with a 365-space parking garage, and an additional 3,110-space parking garage located just west of the Arena.

As noted in Table 3.124-3, the Project traffic study completed an analysis of 30 different project scenarios under both Baseline and Cumulative Conditions and included a study intersection radius ranging from 2 to 3 miles. While it is understood that much of the analysis conducted has significant overlap, in order to ensure that pertinent details within this overlap are not overlooked and to also further ensure that mitigation measures fully address potential project impacts, LADOT respectfully requests the opportunity to continue to provide feedback on the project analysis as part of the final environment review process.

TOPICAL COMMENTS ON THE TRAFFIC STUDY (Appendix K)

Adjusted Baseline

As discussed in the project report, construction has commenced on significant portions of the Hollywood Park Specific Plan (HPSP) located immediately north of the Project Site. The HPSP, which has a projected completion date of September 2021, is included in the Proposed Project's traffic analysis. The analysis included an evaluation of potential parking demands related to concurrent events at the future National Football League stadium in Inglewood.

Given that the Proposed Project is not expected to be complete and operational until mid-2024, the project analysis has been executed using an “adjusted baseline” calculation to establish the “existing” traffic conditions level against which to determine Project activity traffic increases. While LADOT agrees with this analytical approach, it should be noted that the “adjusted” traffic activity attributable to the HPSP is additional traffic, that in and of itself, will contribute significant traffic activity increases to City of Los Angeles intersections while also creating elevated baseline traffic conditions for the proposed project. Therefore, although the IBEC project is being analyzed separately from the HPSP, there is clearly a need to ensure comprehensive coordination between the two projects, particularly in regard to stadium events. In order to provide comprehensive mitigation and ongoing collaboration, a cooperative mitigation program for both projects should be considered.

Traffic Mitigations

Of the 28 study intersections located, either wholly or partially, within the City of Los Angeles, the report indicates that the project could potentially result in significant traffic impacts at up to 19 locations, with 13 impacts directly attributed to the project and 19 impacts occurring under a unique scheduling confluence when a Forum event and Major Project event occur concurrently. In order to ensure appropriate redress to the City of Los Angeles potential impacts, LADOT would like to augment the cited Mitigation Measures as follows:

1. 3.14-1 (a), Event Transportation Management Plan (TMP): Include additional language that **requires** communication with LADOT Special Traffic Operations (STO) staff to ensure that appropriate measures are considered to address potential event related queuing conditions on street traffic managed by LADOT, including the potential deployment of traffic officers at critical intersections.
2. 3.14-2 (c), West Century Boulevard / La Cienega Boulevard Physical Improvement: The Project identified a physical improvement to install dual eastbound and westbound left-turn lanes and a westbound exclusive right-turn lane. Inasmuch as the proposed mitigation still requires LADOT review and approval, LADOT requests that the mitigation description include language that **requires** the project to, should the proposed mitigation be deemed infeasible, provide a commensurate substitute mitigation. Therefore, please modify the current mitigation directive to include the following:

“c) Should these improvements be deemed infeasible at the time of reconciliation, the LADOT may substitute an alternative measure of equivalent effectiveness. A substitute measure that can improve the overall safety and operation of this intersection could include, but not be limited to, providing of transportation systems management (TSM) measures or a commensurate contribution to such measures.”

3. 3.14-3 (j), Centinela Avenue / La Cienega Boulevard Physical Improvement: The Project identified a physical improvement to remove the north-leg raised median island to accommodate dual southbound left-turn lanes. Similar to mitigation 3.14-2(c) above, inasmuch as the proposed mitigation still requires LADOT review and approval, LADOT requests that the mitigation description include language that **requires** the project to provide a commensurate substitute mitigation should the proposed mitigation be deemed infeasible. Therefore, please modify the current mitigation directive as follows:

“The project applicant shall work with the City of Inglewood and the City of Los Angeles to remove the median island on the north leg and construct a second left-turn lane on the southbound La Cienega Boulevard at Centinela. Should this improvement be deemed infeasible at the time of reconciliation, the LADOT may substitute an alternative measure of equivalent effectiveness. A substitute measure that can improve the overall safety and operation of this intersection could include, but not be limited to, providing

of transportation systems management (TSM) measures or a commensurate contribution to such measures.”

4. Transportation Demand Management

LADOT appreciates the Project's goal of reducing vehicle trips and encouraging other more sustainable travel modes. This is consistent with local and state mobility objectives, and greenhouse gas emission and VMT reduction goals. Accordingly, the passage of Senate Bill (SB) 743 requires that greater emphasis be placed on the implementation of TDM strategies in order to create more sustainable travel options and reduce the demand for single occupancy vehicle travel. While LADOT is supportive of the very robust TDM program that has been envisioned for the IBEC project, in order to ensure that the application of these strategies provides the greatest mitigation radius possible, the TDM Program should provide an opportunity for collaboration. Therefore, LADOT respectfully requests that the Project TDM mitigation measure include additional language that **requires** annual reporting of travel patterns and statistics to be provided not only to the City of Inglewood but to LADOT as well to inform ongoing event-day transportation management strategies.

5. Event Transportation Management Plan

LADOT recognizes that a comprehensive event transportation management plan (TMP) is essential in addressing the dynamic conditions created by event traffic. Therefore, as with the Project's TDM program, in order to ensure that the TMP provides the greatest mitigation reach possible, the TMP should provide an opportunity for collaboration. Therefore, to reiterate the addressment of mitigation measure 3.14-1(a) above, LADOT requests that the TMP mitigation measure include additional language that **requires** coordination with LADOT's Special Traffic Operations (STO). The STO Office at LADOT has extensive experience in the management of special event traffic and providing this coordination will ensure that the effective radius of the TMP will be applied to the greatest extent possible. The Project does not identify specific measures to address the potential impact to key City of Los Angeles corridors leading into the project. Therefore, it is imperative that further collaboration on this issue be afforded in order to fully explore potential mitigation. The discussion of this mitigation should also include direction to determine an appropriate agreement instrument in order ensure appropriate funding for any necessary event-day resources.

6. Intelligent Transportation Systems (ITS)

As illustrated in the ITS investment planned by the Project along various corridors within the City of Inglewood, the implementation of ITS measures is a critical mitigation action needed in order to ensure the capability for dynamic traffic management and that the signal systems of the different agencies communicate in real time. Since the DEIR discloses that several City of Los Angeles study intersections cannot be directly mitigated, LADOT would like the Project mitigation program to include a commensurate ITS package, to be determined in consultation with appropriate LADOT staff, that can be used to address these impacts.

All transportation improvements and associated traffic signal work within the City of Los Angeles will require final review and approval through the City's Bureau of Engineering B-Permit Program. Other suggested cooperative mitigation should be coordinated through LADOT's West Los Angeles and Coastal Development Review Office.

SPECIFIC STUDY REPORT QUESTIONS / COMMENTS / CLARIFICATIONS

1. If the analytical scenarios are presumably presented in a lowest project activity level to highest project activity level manner then it is similarly presumed that any impacted location under a lower activity scenario will also be impacted under the higher activity scenario. Similarly, it is also presumed that

because the Cumulative analysis scenarios begin with a baseline level higher than the adjusted baseline analysis scenarios, it is expected that impacted locations will likely be affected under a greater number of cumulative scenarios than under the adjusted baseline analysis. Therefore, for those locations where this is not the case, please clarify. Some example locations are listed below:

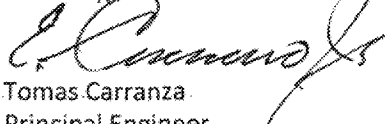
- a. Century Boulevard & Western Avenue and Manchester: significant impact identified under the Cumulative (With the Forum) Plus Major Event Weekday Post-Event Peak Hour scenario but not under the Cumulative (With the Forum and Mid-Sized event and NFL Stadium) plus Major Event Weekday Post-Event Peak Hour scenario. A similar result is shown for Manchester Avenue and Vermont Avenue.
 - b. Century Boulevard & Concourse Way: significant impact identified at this location under the Adjusted Baseline (With Mid-Size Event) Plus Major Event Weekday Pre-Event Peak Hour scenario but not under the Cumulative (With Mid-Sized Event) plus Major Event Weekday Pre-Event Peak Hour scenario.
2. Century Boulevard & Van Ness Avenue: the intersection CMA worksheets should be updated to reflect the current northbound lane configuration which is 1 left-turn lane, 1 through lane and 1 de-facto right-turn lane instead of 1 left-turn, 1 through and 1 through-right.
 3. Tables / Figures: information needs to be cross-reference reviewed and corrected for locations that are not simultaneously identified in both presentations. Example, Manchester Avenue and Western Avenue Adjusted Baseline Plus Project Daytime Event PM Peak Hour impact is reflected in Figure 3.14-13 but not reflected in corresponding Table 3.14-59.

CONCLUSION

The project analysis identified significant potential impacts to key City of Los Angeles corridors leading to the project. The project analysis also identified the significant role TDM and event management planning will play in the mitigation program for this project. Therefore, in order to ensure the best possible strategy for fully addressing the potential impacts of this project, it is imperative that the final environmental impact review process include additional collaboration with LADOT so that critical coordination details can be fully explored and a final collaborative addressment plan can be determined.

If you have any questions, please contact Eddie Guerrero at 213-972-8476 or Robert Sanchez at 213-485-1062.

Sincerely,

FOR →

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