November 27, 2019

Ms. Kate Gordon, Director
Office of Planning and Research
1400 10th Street
Sacramento, California 95814

Dear Ms. Gordon:

AB 987 (Kamlager-Dove, Chapter 961, Statutes of 2018) authorized the Governor to certify a specified sports and entertainment project located in the City of Inglewood for the streamlining of judicial review under the California Environmental Quality Act (CEQA), provided the project meets certain conditions. Two conditions for certification require the California Air Resources Board (CARB) to determine that:

1. The project does not result in any net additional emissions of greenhouse gases (GHG), including GHG emissions from employee transportation;
2. Not less than 50 percent of the GHG reductions would be achieved within the project area and in the neighboring communities of the arena; and
3. Not more than 50 percent of the GHG reductions would be achieved through the purchase of offset credits.

For purposes of making these determinations, Murphy's Bowl LLC (the Applicant) submitted an original application to CARB on January 1, 2019; a supplemental application on June 12, 2019; and clarifying documentation on October 7 and 14 and November 1 and 19, 2019 for the proposed Inglewood Basketball and Entertainment Center Project (IBEC Project). Collectively these documents are considered the application for purposes of CARB's evaluation.

As required by the *Governor's Guidelines for Streamlining Judicial Review under CEQA*, the application included proposed GHG quantification methodologies and supporting documentation. CARB staff conducted an evaluation of the GHG emission estimates and reduction measures submitted by the Applicant, and confirmed that the Applicant's methodology, calculations, and documentation are adequate. Based on the documentation submitted by the Applicant, CARB has determined that the IBEC Project will meet the GHG requirements provided by AB 987, as stated above, once the conditions of approval of the project described in the enclosed staff analysis are satisfied. CARB staff's evaluation and the Executive Order noting CARB's determination are enclosed.

If you have any questions regarding the evaluation, please contact Ms. Nicole Dolney, Chief of the Transportation Planning Branch, Sustainable Transportation and Communities Division, at (916) 322-1695 or nicole.dolney@arb.ca.gov.

Sincerely,

Richard W. Corey
Executive Officer

Enclosures

cc: (via email, with enclosures):

J. Matthew Gerken
AECOM
matthew.gerken@aecom.com

Mr. Robert Hodil
Coblentz Patch Duffy & Bass LLP
rhodil@coblentzlaw.com

Mr. Chris Holmquist
Wilson Meany
CHolmquist@wilsonmeany.com

Mr. Gerard McCallum
Wilson Meany
GMcCallum@wilsonmeany.com

Mr. Dennis Kanuk
Montgomery Clark Advisors
Dennis@mcadvise.com

Mr. Scott Morgan
Governor's Office of Planning and Research
scott.morgan@opr.ca.gov

Ms. Nicole Dolney, Chief
Transportation Planning Branch
Sustainable Transportation and Communities Division
nicole.dolney@arb.ca.gov

State of California
AIR RESOURCES BOARD

EXECUTIVE ORDER G-19-150

Determination of Compliance with the Greenhouse Gas Reduction Requirements Pursuant to Public Resources Code section 21168.6.8 for the Inglewood Basketball and Entertainment Center Project

WHEREAS, in September 2018, Governor Brown signed AB 987 (Kamlager-Dove, Chapter 961, Statutes of 2018), an act titled "California Environmental Quality Act: sports and entertainment project;"

WHEREAS, under AB 987, the Governor may certify certain projects for judicial streamlining under the California Environmental Quality Act (CEQA) if certain conditions are met;

WHEREAS, under California Public Resources Code section 21168.6.8, subsection(b)(3), one condition for the Governor's certification is that the project does not result in any net additional emissions of greenhouse gases (GHG), as determined by the California Air Resources Board (CARB). As specified in subsection (j) of section 21168.6.8, a minimum of 50 percent of the GHG emissions reductions must result from local, direct measures, and no more than 50 percent of GHG emissions reductions may result from offset credits;

WHEREAS, the *Governor's Guidelines for Streamlining Judicial Review under the California Environmental Quality Act* require, for purposes of CARB's determination on GHG emissions, that an applicant submit electronically to CARB a proposed methodology for quantifying the project's GHG emissions and documentation that the project does not result in any net additional GHG emissions;

WHEREAS, pursuant to the Governor's Guidelines, Murphy's Bowl LLC (the Applicant) submitted its initial application to CARB on the proposed Inglewood Basketball and Entertainment Center (Proposed Project) and two potential variants (Project Variants) on January 2, 2019; a supplemental application on June 12, 2019; and clarifying documentation on October 7 and 14 and November 1 and 19, 2019;

WHEREAS, as set forth in greater detail in the application and CARB's *Staff Evaluation of AB 987 Application for Inglewood Basketball and Entertainment Center Project*, construction and operation of the Proposed Project would result in an estimated net increase of 304,683 metric ton (MT) carbon dioxide equivalent (CO_2e) over the project's operational life.

WHEREAS, in the application, the Applicant would secure, through purchasing voluntary carbon credits issued by an accredited carbon registry, 148,417 MT of carbon credits for the Proposed Project to offset the net increase in construction and operational emissions generated throughout the life of the project. With regard to

purchasing voluntary carbon credits, the Applicant has committed to execute contracts for the purchase carbon offset credits for construction emissions prior to the issuance of grading permits, and contracts to purchase carbon offset credits for operational emissions prior to the issuance of the Final Certificate of Occupancy;

WHEREAS, as set forth in greater detail in the application and CARB's *Staff Evaluation of AB 987 Application for Inglewood Basketball and Entertainment Center Project*, the Applicant would reduce 156,266 MT CO_2e emissions through implementation of the following local, direct measures;

Local, Direct Emission Reduction Measures
50 percent of Total Emissions Reductions from LEED Gold Qualifying as Local Direct Measures
IBEC TDM Program
Renewable Energy
Waste Reduction and Diversion
Smart Parking
330 On-Site Electric Vehicle Charging Stations (EVCS)
2 Transit ZEVs
10 Municipal Fleet ZEVs
20 Neighborhood EVCS
1,000 Local Residential EVCS
1,000 Trees Planted
Note: The program to implement the Local Residential Electric Vehicle Charging Stations (EVCS) local, direct reduction measure will be implemented prior to the issuance of grading permits for the project, with 250 EVCS to be implemented yearly for the years 2021 through 2024.

WHEREAS, the Applicant has committed to implementing all local, direct emission reduction measures to fully meet AB 987 requirements by the end of the first NBA regular season or June of the first NBA regular season, whichever is later, during which an NBA team has played at the Proposed Project. Documentation that the measures have been implemented will be submitted to the City of Inglewood, with copies provided to CARB;

WHEREAS, the required GHG emissions reduction measures and procurement of offsets will be set forth in the terms of the Development Agreement between the lead agency (City of Inglewood) and the Applicant, and those conditions will be fully monitored and enforced by the lead agency for the life of the obligation, pursuant to Public Resources Code section 21168.6.8, subdivision (b), paragraph (5).

WHEREAS, CARB staff reviewed and evaluated the application in consultation with the lead agency (the City of Inglewood);

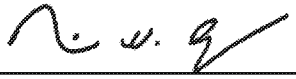
WHEREAS, CARB staff conducted an evaluation of the GHG emission estimates and mitigation included in the application and confirmed the documentation provides an

adequate technical basis for estimating total GHG emissions and mitigation for the Proposed Project;

WHEREAS, CARB's review and determination of the Proposed Project's GHG emissions is for the limited purpose of the Governor's findings and certification under AB 987 and should not be construed as meeting any other requirement under State or federal law, including CEQA; the lead agency remains responsible for full CEQA compliance for this project;

NOW, THEREFORE, based on CARB Staff's Evaluation (Attachment 1) of the documentation submitted by the Applicant (Attachment 2), I determine that the Inglewood Basketball and Entertainment Center Project will not result in any net additional GHG emissions, with a minimum of 50 percent of emission reductions from local, direct measures, and no more than 50 percent of emission reductions from offset credits, pursuant to Public Resources Code section 21168.6.8, et seq. for purposes of certification under AB 987.

Executed at Sacramento, California this 27th day of November 2019.



Richard W. Corey
Executive Officer

Attachments

1. CARB Staff Evaluation of AB 987 Application for Inglewood Basketball and Entertainment Center Project
2. AB 987 Application for the Inglewood Basketball and Entertainment Center Project

CARB Staff Evaluation of AB 987 Application for Inglewood Basketball and Entertainment Center Project

November 27, 2019

I. Executive Summary

Murphy's Bowl LLC (hereafter referred to as the Applicant) has proposed the Inglewood Basketball and Entertainment Center (IBEC), a new mixed-use development within the City of Inglewood. The Applicant is seeking certification for this project under AB 987 (Kamlager-Dove, Chapter 961, Statutes of 2018), which provides for streamlined judicial review under the California Environmental Quality Act (CEQA) if certain conditions are met. To be eligible for streamlining, the project must not result in any net additional emissions of greenhouse gases (GHG) and a minimum of 50 percent of the greenhouse gas emissions reductions must result from local, direct measures, and no more than 50 percent of reductions may result from offset credits as determined by the California Air Resources Board (CARB). This technical evaluation supports CARB's determination.

CARB staff reviewed the projected GHG emissions provided by the Applicant using the data sources, emission factors, emission calculations, and assumptions in the documentation provided by the Applicant. The documentation provided by the Applicant includes the application submitted on January 2, 2019, the supplemental application submitted on June 12, 2019, and clarifying documentation submitted on October 7 and 14 and November 1 and 19, 2019. Collectively these materials comprise the application and are included in Attachment 2.

Based on an evaluation of the documentation, CARB staff concludes that, with commitments to implement feasible GHG emissions reduction measures and purchase carbon credits, the IBEC project (hereafter referred to as the Proposed Project) would not result in any net additional GHG emissions relative to the baseline. CARB staff confirms that the Proposed Project would meet the GHG emissions requirements of AB 987 pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code." (Pub. Resources Code, § 21168.6.8, subd. (b), parag. (3).)

Construction and operation of the Proposed Project would result in an estimated net increase of 304,683 metric ton (MT) carbon dioxide equivalent (CO_2e) over the project's operational life. Reduction measures committed by the project Applicant would achieve 156,266 MT CO_2e in local, direct emission reductions, which is 51 percent of total operational emissions and thus exceeds the 50 percent requirement for local, direct measures. Further, offset credits purchased by the Applicant would achieve 148,417

MT CO_2e in reductions, which meets the AB 987 requirement for not more than 50 percent of GHG emissions reductions from offset credits. A detailed description of emissions by source is described in subsequent sections.

The Applicant has committed to enter into contracts to offset construction emissions prior to the issuance of grading permits, and operation emissions prior to the issuance of the final certificate of occupancy for the Proposed Project. Copies of the contract(s) will be promptly provided to the City of Inglewood, the Governor's Office, and CARB to verify that construction and operational emissions have been offset. Enforcement of compliance will be outlined in the terms of the development agreement between the City of Inglewood and the Applicant and will be imposed by the City as conditions of approval that will be monitored and fully enforceable by the City for the life of the obligation.

I. Introduction

Murphy's Bowl LLC (the Applicant) has proposed the Inglewood Basketball and Entertainment Center, a new mixed-use development on an approximately 33-acre site located at the southern boundary of the South Prairie Avenue and Century Boulevard intersection within the City of Inglewood (the City), as described in Attachment 2[1].

The Applicant is seeking certification for this project under AB 987, which provides for streamlined judicial review under the California Environmental Quality Act (CEQA) if certain conditions are met, as described below.

CARB staff prepared this technical evaluation of the GHG emissions from the Proposed Project as part of its determination. This evaluation includes an executive summary, an overview of the AB 987 requirements, a brief description of the Proposed Project, a technical review and assessment of GHG emissions information provided by the Applicant in its AB 987 application, and CARB staff's determination regarding whether the Proposed Project meets the GHG requirements as provided in AB 987.

[1] Attachment 2 contains the following documentation provided by the Applicant: initial application on January 2, 2019; supplemental application on June 12, 2019; and clarifying documentation on October 7 and 14, 2019; and November 1 and 19, 2019. These comprise the Applicant's full AB 987 submittal, when taken in their entirety, and are used by CARB staff to make the AB 987 determination.

II. Overview of AB 987

AB 987 provides streamlined judicial review of challenges to the lead agency's decision to certify the project's environmental impact report (EIR) or grant project approval if certain conditions are met. AB 987 requires, among other things, that the following conditions are met, as determined by CARB:

- **Section §21168.6.8, subd. (b), parag. (3).** The Proposed Project would result in no net additional GHG emissions, including GHG emissions from employee transportation.
- **Section §21168.6.8 subd. (j), parag. (3).** A minimum of 50 percent of the GHG emissions reductions would result from local, direct GHG reduction measures. And only 50 percent of the GHG reductions achieved through design features implemented to meet the AB 987 LEED gold certification requirement may be counted towards the local, direct requirement.
- **Section §21168.6.8 subd. (j), parag. (4).** Not more than 50 percent of GHG emissions reductions would result from offset credits.

The role of CARB in reviewing the AB 987 application for purposes of the Governor's certification is limited to an evaluation of the quantification methods and documentation[2] submitted by the Applicant.

The Governor's Guidelines for AB 900 applications, under which the AB 987 application is evaluated, require applicants to submit a proposed methodology for quantifying the project's GHG emissions and documentation that the project will not result in any net additional GHG emissions. The documentation must quantify direct and indirect GHG emissions associated with the project's construction and operation, including GHG emissions from employee transportation, and the net emissions of the project after accounting for any mitigation measures. The project's net emissions, after mitigation, must be monitored and enforced consistent with Public Resources Code section §21168.6.8, subdivision (b), paragraph (5).

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[2] The technical elements of the project application evaluated by CARB staff include existing emissions in the absence of the project [i.e., baseline], project emissions, input data and assumptions used for emissions and mitigation calculations, and quantification methods used in the Application.

III. Existing Baseline Conditions

Onsite

The Proposed Project site is located at the southern boundary of the South Prairie Avenue and Century Boulevard intersection within the City of Inglewood. The approximately 33-acre site currently contains the following existing land uses:

- 16,806 square foot (sq. ft.) hotel.
- 1,118 sq. ft. fast food restaurant.
- 28,809 sq. ft. light industrial building.
- 1,134 sq. ft. commercial building.
- 6,321 sq. ft. light industrial building.

Offsite

In addition to the above existing land uses currently located at the Proposed Project site, the LA Clippers currently operate the following land uses at three offsite locations; these facilities would be relocated to the Proposed Project site:

- 19,860 sq. ft. LA Clippers Team Offices in downtown Los Angeles.
- 42,691 sq. ft. LA Clippers Training Center in the Playa Vista neighborhood of Los Angeles.
- LA Clippers games at the 918,000 sq. ft. Staples Center in downtown Los Angeles.

IV. Proposed Project Description

The Applicant proposes the construction of a new basketball and entertainment center and related development in the City of Inglewood to serve as the new home of the LA Clippers. The Proposed Project includes a new arena, practice and training facility, and office space for the LA Clippers, as well as ancillary development, including a sports medicine clinic and retail, restaurant, community space and hotel uses. The multipurpose arena would be used for LA Clippers home basketball games and as a performance venue that could be configured for other events of various sizes, including concerts, other sporting events, family shows, conferences, and civic and community events. The Proposed Project includes two parking structures and a surface parking lot, with a pedestrian bridge across South Prairie Avenue connecting one of the parking structures to the arena and plaza area (Figure 1). Table 1 contains a description of the types of land uses and sizes of each land use that occur under the baseline and Proposed Project. Further, as the existing baseline conditions include land uses that

are located on the project site and off the project site (e.g., Staples Center), Table 1 also indicates which existing baseline land uses are found onsite and offsite.

Table 1: Existing Baseline and Proposed Project Land Uses

Land Use	Existing Baseline Uses	Proposed Project
Fast food restaurant	1,118 sq. ft. (onsite)	----
Commercial building	1,134 sq. ft. (onsite)	----
Light industrial building	28,809 sq. ft. (onsite)	----
Light industrial building	6,321 sq. ft. (onsite)	----
Hotel	16,806 sq. ft./38 rooms (onsite)	217, 800 sq. ft./150 Rooms
LA Clippers Team Offices	19,860 sq. ft. (offsite)	71,000 sq. ft.
LA Clippers Training Center	42,691 sq. ft. (offsite)	85,000 sq. ft.
Arena	918,000 sq. ft. – Staples (offsite)	915,000 sq. ft.
Sports Medicine Clinic	----	25,000 sq. ft.
Community Space	----	15,000 sq. ft.
Full-Service Restaurant/Bar	----	7,000 sq. ft.
Full-Service Restaurant/Lounge	----	8,000 sq. ft.
Coffee Shop	----	5,000 sq. ft.
Quick-Service Restaurant	----	4,000 sq. ft.
LA Clippers Team Store	----	7,000 sq. ft.
Other General Retail & Services	----	17,000 sq. ft.
Parking Structure	----	214,500 sq. ft./650 spaces
Parking Structure	----	1,063,435 sq. ft./3,110 spaces
Parking Structure	----	137,000 sq. ft./590 spaces
Notes: sq. ft. = square feet Source: as documented in Attachment 2.		

In addition to the Proposed Project, two variants are also currently under consideration to allow for flexibility in the development of the project, collectively referred to in this analysis as the Project Variants. The Applicant is including Project Variants to ensure both the Proposed Project and the Project Variants would meet the AB 987 GHG reduction requirements and would receive AB 987 streamlining in the event a variant is implemented. CARB's analysis considers the highest-emitting scenario among the project and variants. As shown in Tables 3 and 4 below, the Proposed Project has higher emissions than the Project Variants. Consequently, the Project Variants, if implemented, would also meet the AB 987 reduction requirements.

Each project variant would include the same number of parking and loading spaces, mechanical equipment, general vehicular circulation, streetscape improvements, and sustainability features as the Proposed Project. The Project Variants would have the same program and size of development for the proposed buildings as the Proposed Project, and both would involve implementation of the transportation demand management (TDM) program as described in the AB 987 application.

Alternate Prairie Access Variant

The Alternate Prairie Access Variant would involve two additional parcels currently developed with a 1,628 sq. ft. three-unit residential building and a 795 sq. ft. single-family residence, if made available for sale by the current property owners and acquired by the Applicant. All structures on properties acquired for the Proposed Project would be removed prior to start of construction. Emissions associated with the existing buildings that would be removed prior to construction of the Proposed Project or the Alternate Prairie Access Variant were included in the baseline conditions, with the exception of the 6,321 sq. ft. light industrial building that was vacant at the time that the Notice of Preparation for the Proposed Project was published in February 2018.

The Alternate Prairie Access Variant would allow for a different configuration for vehicular access from South Prairie Avenue and minor alterations to the design of the main pedestrian plaza and the alignment of the arena structure and would only be implemented if two additional parcels are acquired by the Applicant.

West Century Boulevard Pedestrian Bridge Variant

The West Century Boulevard Pedestrian Bridge Variant could be incorporated into the development of either the Proposed Project or the Alternate Prairie Access Variant and would allow for the construction of a second pedestrian bridge, across West Century Boulevard for pedestrian access to the Proposed Project from the Los Angeles Sports and Entertainment District located to the north of West Century Boulevard.

V. Technical Review and Assessment

AECOM, on behalf of the Applicant, prepared a GHG emissions assessment for the Proposed Project to demonstrate that the requirements of AB 987 are met. The documentation for the Applicant's assessment is included in Attachment 2.

The Applicant relied upon a variety of sources for activity data and emission factors to quantify GHG emissions and reduction measures. This CARB staff evaluation is focused on reviewing the data sources, emission factors, emission calculations, and assumptions used for the emissions quantification, and determining whether these sources and assumptions are reasonable.

The Applicant relied upon Version 2016.3.2 of the California Emissions Estimator Model (CalEEMod), a widely used emissions quantification model developed in coordination with local air districts to quantify criteria pollutant and GHG emissions from land use development projects in California. CalEEMod uses widely accepted sources for emission estimates combined with appropriate default data that can be used if site-specific information is not available. CalEEMod is populated with data from the United

States Environmental Protection Agency AP-42 emission factors, CARB's on-road and off-road equipment emission models such as the EMission FACtor 2014 model (EMFAC2014) and the Off-road Emissions Inventory Program model (OFFROAD). The Applicant used the latest CalEEMod version, in combination with project-specific data, to calculate GHG emissions from project construction and operation, as well as mitigation from the reduction measures that will be implemented by the Applicant.

VI. Project Construction Emissions

Construction-related GHG emissions, including demolition-related emissions, are one-time, direct emissions. These emissions reflect the types of equipment expected and the number of hours of operation anticipated over the construction schedule, and include heavy-duty equipment such as refuse hauling trucks, excavators, cranes, and conventional work vehicles. The Applicant estimated GHG emissions associated with project construction by using CalEEMod. With some exceptions, the Applicant used CalEEMod default settings to generate construction-related GHG emissions.

Table 2 shows project GHG emissions generated by construction activities, and indicates a total of 20,833 MT CO_2e over the project construction period for the Proposed Project and 20,859 MT CO_2e for the Project Variants.

Table 2: Project Construction-Generated GHG Emissions (MT CO_2e/year)

Construction Year	Proposed Project	Project Variants
2021[1]	3,834	3,860
2022	8,373	8,373
2023	7,437	7,437
2024[2]	1,188	1,188
Total	20,833	20,859
GHG Credits Required[2]	**20,833**	**20,859**

Notes: GHG = greenhouse gas; IBEC = Inglewood Basketball and Event Center; MT CO_2e = Metric tons carbon dioxide equivalent;

[1] Construction in 2021 is anticipated to only occur July through December.

[2] Construction in 2024 is anticipated to only occur January through June.

[3] Applicant committed to purchase carbon credits in an amount sufficient to offset net increases in construction-related GHG emissions. The Applicant will, to the extent feasible, place the highest priority on the purchase of offset credits that produce emission reduction within the City or the boundaries of the South Coast Air Quality Management District.

Source: Attachment 2.

CARB staff concluded that the methodology and estimated GHG emissions provided by the Applicant for construction are appropriate.

VII. Baseline Operational Emissions

Baseline conditions represent currently operational onsite and offsite land uses and activities that will be affected by the IBEC facility. These include land uses currently located at the existing project site that would be demolished and removed as part of the project, as well as the following land uses and activities that will be relocated to the Proposed Project site from an offsite location:

- LA Clippers team offices and practice/athletic training facilities would relocate from downtown Los Angeles and the Playa Vista neighborhood of Los Angeles, respectively, to the new IBEC facility.
- All LA Clippers home basketball games would relocate from the Staples Center in downtown Los Angeles to the new IBEC facility.
- Non-basketball events identified in the application would be relocated from three major existing venues in the Los Angeles area (the Staples Center, the Honda Center, and The Forum) to the new IBEC facility.

Operational activities and associated emissions in year 2018 serves as the baseline for purposes of this analysis, which represents existing conditions the year the California Environmental Quality Act Notice of Preparation of an Environmental Impact Report for the Proposed Project was filed. GHG emissions were quantified for mobile, electricity, natural gas, area, solid waste, water, and wastewater sources. As summarized in Tables 3 and 4, GHG emissions associated with Proposed Project baseline conditions are estimated as 1,209 MT CO_2e annually for the years 2021 through 2023[3], 7,249 MT CO_2e for the year 2024[4], and 13,289 MT CO_2e annually for the years 2025 through 2054. As summarized in Tables 3 and 4, GHG emissions associated with Project Variants baseline[5] conditions are estimated as 1,269 MT CO_2e annually for the years

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[3] Baseline emission estimates for 2021 through 2023 include only emissions associated with the existing on-site buildings that would be removed at the start of construction.

[4] Baseline emissions for 2024 only includes half of the existing annual operational emissions associated with the LA Clippers Facilities, existing LA Clippers games, and market-shifted non-NBA events because Proposed Project operations are anticipated to start July 1, 2024; thus, the net new emission estimates for 2024 include only six months of operational emissions.

[5] Project Variant baseline emissions are higher than the Proposed Project baseline emissions because the Alternate Prairie Access Variant would include two additional parcels that currently are developed with a single-family home and a three-unit residential use, resulting in a total of up to eight buildings that may be removed under that variant.

2021 through 2023[6], 7,309 MT CO_2e annually for the year 2024[7], and 13,349 MT CO_2e annually for the years 2025 through 2054.

CARB staff evaluated the Applicant's GHG emission estimations, demand factors, and assumptions used in the Applicant's Proposed Project and Project Variants baseline calculations, summarized in Tables 3 and 4, respectively. CARB staff concluded that the methodology and estimated baseline GHG emissions provided by the Applicant are appropriate.

VIII. Proposed Project Operational Emissions

Operational GHG emission sources from the Proposed Project include mobile, electricity, natural gas, area, stationary, solid waste, water, and wastewater sources. Operational GHG emissions from the Proposed Project were assumed to begin July 1, 2024. The emissions estimates assume the following:

- 243 total events, which include 61 new events to the region that would all occur at the IBEC facility (2 new Clippers pre-season games and 59 new non-NBA games) and 182 market-shifted events (47 Clippers games and 135 non-NBA games).
- Events occurring at the IBEC facility are assumed to have been relocated (i.e., "market shifted") from the three major existing venues in the Los Angeles area (the Staples Center, the Honda Center, and The Forum).
- The market-shifted events at the three existing venues would be 100 percent fully replaced (i.e., "backfilled") due to the incremental growth in the region that would be facilitated by the introduction of the new IBEC facility.

Mobile Source Emissions

Mobile source emissions were estimated from CalEEMod based on the land use types and sizes associated with the Proposed Project. The analysis utilized a project-specific trip generation analysis that was refined to reflect survey data, while also accounting for reductions in project trips as a result of the project TDM program, as indicated in the *IBEC Trip Generation Memorandum* and *IBEC Transportation Demand Management*

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[6] Baseline emission estimates for 2021 through 2023 include only emissions associated with the existing on-site buildings that would be removed at the start of construction.

[7] Baseline emissions for 2024 only includes half of the existing annual operational emissions associated with the LA Clippers Facilities, existing LA Clippers games, and market-shifted non-NBA events because Proposed Project operations are anticipated to start July 1, 2024; thus, the net new emission estimates for 2024 include only six months of operational emissions.

Program (IBEC TDM Program) Supplemental Technical Memorandum prepared by AECOM (included in Attachment 2).

Energy Emissions

As CalEEMod does not contain the most current electricity emissions factors for Southern California Edison (SCE), Anaheim Public Utilities, and Los Angeles Department of Water and Power, the CalEEMod default values were updated to 549 pounds per megawatt-hour (lb/MWh), 1,112 lb/MWh, and 770 lb/MWh, respectively. As CalEEMod does not currently reflect the most current Renewables Portfolio Standard (RPS), such as Senate Bill 100, the electricity emission factors associated with the Proposed Project were adjusted for future years, consistent with the procurement requirements under the RPS. The Proposed Project would also include a 700-kilowatt (kW) solar photovoltaic (PV) system, generating approximately 1,085,000 kW-hours of renewable energy annually.

Solid Waste Emissions

Emissions from solid waste disposal were estimated using CalEEMod using waste disposal rates for a similar project, the Sacramento Kings Arena, which were obtained from the City of Sacramento Entertainment and Sports Center & Related Development Draft Environmental Impact Report[8].

Water and Wastewater Emissions

Emissions from water consumption were estimated using CalEEMod using a water demand study prepared by Stetson Engineers, Inc. This analysis included project-specific data and water demands – both with and without Leadership in Energy and Environmental Design (LEED) Gold features. The electricity usage related to water supply, treatment, distribution and wastewater treatment used the same emission factors for electricity as were used for on-site electricity calculations.

Area Source Emissions

Emissions from area sources, including equipment used to maintain landscaping, such as lawnmowers and trimmers, were estimated using CalEEMod default values. The

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[8] City of Sacramento. 2013. Sacramento Entertainment and Sports Center & Related Development Draft Environmental Impact Report. Available: http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Environmental-Impact-Reports/ESC/ESC_Certified_EIR_Vol_1.pdf?la=en and http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/Environmental-Impact-Reports/ESC/ESC_Certified_EIR_Vol_2.pdf?la=en.

only additional stationary source of emissions is an on-site emergency generator with an estimated capacity rated at 3,250 kW, which would provide emergency power primarily for lighting and other emergency building systems. Emissions of GHGs would be generated during maintenance and testing operations and were estimated using CalEEMod default assumptions. Emergency generators are permitted by the South Coast Air Quality Management District (SCAQMD) and regulated under SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines). Maintenance and testing would not occur daily, but rather periodically, up to 50 hours per year per Rule 1470.

IX. Net Greenhouse Gas Emissions

As summarized in Tables 3 and 4, respectively, annual project construction and operational emissions would exceed baseline throughout the lifetime of the Proposed Project and Project Variants. Further, for the Proposed Project, construction and operation would result in an estimated net increase of 304,683 metric ton (MT) carbon dioxide equivalent (CO_2e) over the project's operational life (30 years).

CARB staff evaluated the Proposed Project's emission calculations, demand factors, and assumptions used to estimate operational GHG emissions and concluded that the methodology and estimated operational GHG emissions provided by the Applicant are appropriate.

Table 3: Comparison of Proposed Project and Baseline GHG Emissions

A	GHG Emissions (MT CO_2e/year)		
	B	C	D (B-C)
Year	**Proposed Project**	**Baseline** [5]	**Net Proposed Project**
2021[1,2]	3,834	1,209	2,625
2022 [1,2]	8,373	1,209	7,164
2023 [1,2]	7,437	1,209	6,228
2024 [3]	17,084	7,249	9,835
2025	31,077	13,289	17,788
2026	30,154	13,289	16,864
2027	29,318	13,289	16,029
2028	28,558	13,289	15,268
2029	27,861	13,289	14,571
2030	27,220	13,289	13,931
2031	26,468	13,289	13,179
2032	25,723	13,289	12,434
2033	25,022	13,289	11,733
2034	24,361	13,289	11,072
2035	23,737	13,289	10,448
2036	23,148	13,289	9,858
2037	22,590	13,289	9,301
2038	22,061	13,289	8,771
2039	21,555	13,289	8,265
2040	21,068	13,289	7,779
2041	20,601	13,289	7,312
2042	20,147	13,289	6,858
2043	19,705	13,289	6,416
2044	19,272	13,289	5,983
2045	18,846	13,289	5,556
2046	18,822	13,289	5,533
2047	18,804	13,289	5,514
2048	18,789	13,289	5,499
2049	18,776	13,289	5,487
2050	18,766	13,289	5,476
2051	18,766	13,289	5,476
2052	18,766	13,289	5,476
2053	18,766	13,289	5,476
2054	18,766	13,289	5,476
Total	**714,239**	**409,556**	**304,683**

Notes: GHG = greenhouse gas; MT CO_2e = Metric tons carbon dioxide equivalent.
Total may not add due to rounding.

[1] Project emission estimates for 2021 through 2023 include only construction-related emissions.

[2] Baseline emission estimates for 2021 through 2023 include only emissions associated with the existing on-site buildings that would be removed at the start of construction.

[3] Proposed Project operations are anticipated to start July 1, 2024. Net new emission estimates for 2024 include six months of construction emissions and six months of operational emissions. Baseline emissions for 2024 only include half of the existing annual operational emissions associated with the LA Clippers Facilities, existing LA Clippers games, and market-shifted non-NBA events.

[4] Reduction measures include implementation of the IBEC Transportation Demand Management (TDM) Program.

[5] See Table 1 for a summary of land uses assumed under Baseline conditions.

Source: as documented in the November 1, 2019 *Greenhouse Gas Emissions Offset Commitment Approach* letter in Attachment 2 and summarized by CARB staff from modeling files provided by the Applicant.

Table 4: Comparison of Project Variant and Baseline GHG Emissions

A	GHG Emissions (MT CO_2e/year)		
	B	C	D (B-C)
Year	**Project Variant[5]**	**Baseline**	**Net Project Variant**
2021[1,2]	3,860	1,269	2,591
2022 [1,2]	8,373	1,269	7,105
2023 [1,2]	7,437	1,269	6,168
2024 [3]	17,084	7,309	9,776
2025	31,077	13,349	17,728
2026	30,154	13,349	16,805
2027	29,318	13,349	15,969
2028	28,558	13,349	15,209
2029	27,861	13,349	14,512
2030	27,220	13,349	13,872
2031	26,468	13,349	13,119
2032	25,723	13,349	12,375
2033	25,022	13,349	11,674
2034	24,361	13,349	11,012
2035	23,737	13,349	10,389
2036	23,148	13,349	9,799
2037	22,590	13,349	9,242
2038	22,061	13,349	8,712
2039	21,555	13,349	8,206
2040	21,068	13,349	7,720
2041	20,601	13,349	7,252
2042	20,147	13,349	6,799
2043	19,705	13,349	6,357
2044	19,272	13,349	5,924
2045	18,846	13,349	5,497
2046	18,822	13,349	5,474
2047	18,804	13,349	5,455
2048	18,789	13,349	5,440
2049	18,776	13,349	5,428
2050	18,766	13,349	5,417
2051	18,766	13,349	5,417
2052	18,766	13,349	5,417
2053	18,766	13,349	5,417
2054	18,766	13,349	5,417
Total	**714,265**	**411,570**	**302,694**

Notes: GHG = greenhouse gas; MT CO_2e = Metric tons carbon dioxide equivalent.
Total may not add due to rounding.

[1] Project emission estimates for 2021 through 2023 include only construction-related emissions.

[2] Baseline emission estimates for 2021 through 2023 include only emissions associated with the existing on-site buildings that would be removed at the start of construction.

[3] Project operations are anticipated to start July 1, 2024. Net new emission estimates for 2024 include six months of construction emissions and six months of operational emissions. Baseline emissions for 2024 only include half of the existing annual operational emissions associated with the LA Clippers Facilities, existing LA Clippers games, and market-shifted non-NBA events.

[4] Reduction measures include implementation of the IBEC Transportation Demand Management (TDM) Program.

[5] Each project variant would result in the same operational GHG emissions, as they include the same number of parking and loading spaces, mechanical equipment, general vehicular circulation, streetscape improvements, and sustainability features as the Proposed Project, and they would not have an effect to project operational activities. The Project Variants would have the same program and size of development for the proposed buildings as the Proposed Project, and both would involve implementation of the TDM Program as described in the application.

Source: as documented in Attachment 2 of the November 1, 2019 *Greenhouse Gas Emissions Offset Commitment Approach* letter and summarized by CARB staff from modeling files provided by the Applicant.

X. Method to Reduce and Offset Emissions

Under the GHG quantification methodology used by the Applicant, the Proposed Project would result in an estimated net increase of 304,683 MT CO_2e, while the Project Variants would result in an estimated net increase of 302,694 MT CO_2e, as summarized in Tables 3 and 4, respectively. Operational emissions would be on-going for the project analysis time horizon (defined as 30 years), and would be expected to decline over the life of the project with the adoption of lower-GHG-emitting vehicle technologies and renewable sources of electricity. The Applicant has demonstrated that it would meet the requirement set forth in California Public Resources Code pursuant to AB 987.

As indicated in Table 3, the Proposed Project would result in an estimated net increase of 304,683 MT CO_2e over the project's operational life, of which 50 percent (152,342 MT CO_2e) must be reduced through local, direct measures. Table 5 summarizes the local, direct reduction measures the Applicant will implement to meet AB 987 requirements. These measures would reduce GHG emissions by 156,266 MT CO_2e, which exceeds the 152,342 MT CO_2e in local reductions necessary to meet the AB 987 50 percent local reduction requirement. The remaining 148,417 MT CO_2e reductions needed would be procured through offset credits[9].

[9] GHG offset credits are calculated as the difference in total project emissions and emission reductions achieved through local, direct measures.

Table 5: GHG Emissions Reductions from Local, Direct Measures

#	Measure	MT CO2e
1	50 percent of Total Emissions Reductions from LEED Gold Qualifying as Local Direct Measures[1]	3,755
2	Reductions from IBEC TDM Program[1]	74,797
3	Renewable Energy[2]	7,617
4	Waste Reduction and Diversion[2]	31,587
5	Smart Parking[2]	1,480
6	330 On-Site Electric Vehicle Charging Stations (EVCS)[2]	13,918
7	2 Transit ZEVs[2,3]	597
8	10 Municipal Fleet ZEVs[2,3]	299
9	20 Neighborhood EVCS[2,3]	2,029
10	1,000 Local Residential EVCS[2,3,4]	19,487
11	1,000 Trees Planted[2,5]	700
	Total Committed Local, Direct Reductions	**156,266**

Notes:

[1] The reductions from the LEED Gold Measures and TDM Program are from the original January 2, 2019 application and June 12, 2019 supplemental application.

[2] The other local, direct reduction measures are from the letters provided by the Applicant on November 1 and November 18.

[3] Reductions assumed over a 10-year operational life.

[4] The additional local, direct reduction measures identified in the June 12, 2019, supplemental application (i.e., photovoltaic system on parking facilities, purchasing renewable energy through SCE's Green Rate program, and purchasing renewable natural gas) have been replaced by the 1,000 reduction measure described in the November 18, 2019, *Electric Vehicle Home Charger Program Commitment* letter.

[5] Reductions assumed over a 20-year operational life.

Source: Attachment 2 and CARB analysis of Tables 3 and 4 from the November 1, 2019 *Greenhouse Gas Emissions Offset Commitment Approach* letter and page A-1 from the November 18, 2019 *Electric Vehicle Home Charger Program Commitment* letter.

To the extent carbon offsets are used to mitigate GHG emissions from the project, the Applicant will purchase voluntary carbon credits issued by an accredited carbon registry, such as the American Carbon Registry, Climate Action Reserve, and Verra, for the net increase in construction and operational emissions. Contracts to purchase carbon offset credits for construction emissions will be entered into prior to the issuance of grading permits, and contracts to purchase carbon offset credits for operational emissions will be entered into prior to the issuance of the final certificate of occupancy for the Proposed Project. Copies of the contract(s) will promptly be provided to CARB, the Governor's Office, and the City of Inglewood to verify that construction and operational emissions have been offset.

Conversation with City of Inglewood Planning Department staff indicates the reduction measure commitments proposed by the Applicant in its AB 987 application (Table 5) will be incorporated into the project's Final Environmental Impact Report (FEIR) as project

design features or mitigation measures. Consistent with CEQA requirements, the Applicant agrees to comply with all project design features and mitigation measures contained in the FEIR through the project's Mitigation Monitoring and Reporting Program, which represents a binding and enforceable agreement with the City of Inglewood, and will be in the terms of the development agreement.

Any identified project design features/on-site reduction measures, off-site local or regional GHG emission reduction measures used to mitigate GHG emissions and any commitments to enter into contracts to offset net additional GHG emission will be incorporated as conditions of project approval under Public Resources Code Section 21183(e), which shall be binding and enforceable by the City of Inglewood as the lead agency. The Applicant has committed to implementing all reduction measures identified in Table 5 to fully meet AB 987 requirements by the end of the first NBA regular season or June of the first NBA regular season, whichever is later, during which an NBA team has played at the Project Arena[10]. Documentation that the measures have been implemented will be submitted to the City, with copies provided to CARB.

XI. Conclusions and Recommendations

Based on an evaluation of the documentation provided by the Applicant, CARB has concluded that the Proposed Project would result in no net additional GHG emissions, that a minimum of 50 percent of the GHG emissions reductions would result from local, direct measures, and that not more than 50 percent of reductions would result from offset credits.

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[10] Note the program to implement the Local Residential Electric Vehicle Charging Stations (EVCS) local, direct reduction measure will be implemented prior to the issuance of grading permits for the project, with 250 EVCS to be implemented yearly for the years 2021 through 2024.