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*Making Conservation  
a California Way of Life.*

March 24, 2020

Mindy Wilcox, AICP  
Planning Manager  
City of Inglewood, Planning Division  
One West Manchester Boulevard, 4<sup>th</sup> Floor  
Inglewood, CA 90301

RE: Inglewood Basketball and Entertainment  
Center (IBEC)  
Draft Environmental Impact Report (DEIR)  
SCH# 2018021056  
GTS# 07-LA-2018-03039  
Vic. LA-105/ PM 3.294  
Vic. LA-405/ PM 22.141

Dear Ms. Wilcox:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would develop the following key elements: An 18,000-fixed-seat arena (Arena Structure or Arena) suitable for National Basketball Association (NBA) games, with up to 500 additional temporary seats for other sports or entertainment events, comprised of approximately 915,000 square feet of space including the main performance and seating bowl, food service and retail space, and concourse areas. The Arena Structure would include an integrated approximately 85,000 square foot team practice and training facility, an approximately 25,000 square foot sports medicine clinic, and approximately 71,000 square feet of space that would accommodate the Los Angeles (LA) Clippers team offices. Contiguous to the Arena Structure would be a 650-space parking garage for premium ticket holders, VIPs, and certain team personnel.

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Caltrans continues to strive towards implementing strategies that provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability. After reviewing the Draft Environmental Impact Report (DEIR), Caltrans has the following comments:

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Caltrans, the Lead Agency (City of Inglewood), and the City's consultancy group (Trifiletti Consulting, Inc.) have been in communication throughout the stages leading up to the DEIR in order to best identify consistent and practical solutions towards alleviating potential transportation impacts on State and Local facilities. On March 22, 2018, Caltrans commented on the Notice of Preparation of an EIR for the Inglewood Basketball and Entertainment Center (IBEC). On January 29, 2019 Caltrans, the City of Inglewood, and other stakeholders, convened for a formal consultation meeting to discuss impact thresholds and technical approaches to be used for the analysis of State facilities in the DEIR. The City of Inglewood agreed to analyzing specific

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interchanges and on- and off-ramps at the following State facilities: I-105, I-110, and I-405. These locations are outlined in the Caltrans response date dated April 19, 2019.

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Based on the review of the DEIR for the IBEC, Caltrans has the following comments:

- The Daytime and Major Events at the proposed project arena would cause significant impacts on State facilities, specifically I-405, under cumulative conditions. Given that this proposed project would result in significant State facility usage, it is recommended that the developer work closely with Caltrans to identify and implement operational improvements along I-405. Such traffic management system improvements could include, but are not limited to, the following: Active Traffic Management (ATM) and Corridor Management (CM) Strategies such as queue warning, speed harmonization, traveler information; Transportation Management System (TMS) elements such as closed circuit television cameras (CCTV), changeable message signs (CMS), etc.

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To mitigate the potential impacts on the I-405, we recommend that the project's developer work with Caltrans early on developing a fair share mitigation agreement towards a proposed project that involves adding the aforementioned improvements to the I-405 within the project's vicinity.

- Per Table K.2-T, K.2-U, K.2-V, K.2-W, and K.2-X, Northbound (NB) and Southbound (SB) I-405 mainline segments will have direct significant impact(s) due to weaving/merging operation. Please identify the mitigation measures, if any.
- Mitigation measure 3.14-3(c) includes restriping the center lane on the I-405 NB Off-Ramp at West Century Boulevard to permit both left and right-turn movements. Caltrans anticipates that the conversion of the middle lane to a shared lane will result in queue for the left turn traffic. Please provide further explanation to justify that the mitigation measure at the I-405 NB off-ramp at West Century Boulevard will not lead to significant impacts.

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If necessary, widening of the off-ramp to add another right turn lane would be considered as a viable mitigation alternative. Please note that ICE screening is required if intersection modification is proposed.

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- According to the DEIR the following intersections have "Significant Impacts" under one or more scenarios. Please provide more details regarding what mitigation measures were proposed for these intersections and why they were not feasible for this proposed project.

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If no mitigation measures have been identified, Caltrans is able to help the developer identify any viable mitigation measures at the following locations for the proposed project:

- Eastbound (EB) I-105 on-ramp from Imperial Highway
- EB I-105 on/off-ramps from 120th Street
- Westbound (WB) I-105 off-ramp to Hawthorne Boulevard

- As a reminder, Caltrans requires the Intersection Control Evaluation (ICE) Step One screening to be conducted as per the guidelines set forth in the Caltrans ICE Process Informational Guide for Traffic Operations Policy Directive 13-02 – Please perform Intersection Control Evaluation (ICE TOPD) at the following locations:

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- WB I-105 off-ramp approach to South Prairie Avenue
- WB I-105 off-ramp to Crenshaw Boulevard

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Regarding active transportation and transit Caltrans “supports aspects of the mitigation measures that achieve state-level policy goals related to sustainable transportation seek to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG), and encourage alternative modes of travel. Caltrans’ Strategic Management Plan has set targets of tripling trips made by bicycle and double trips made by walking and public transit by 2020. The Strategic Plan also seeks to achieve a 15% reduction in statewide, per capita, vehicle miles traveled (VMT) by 2020. Similar goals are embedded in California Transportation Plan 2040, and Southern California Association of Governments’ (SCAG) Regional Transportation Plan. Statewide legislation such as AB 32 and SB 375, as well as Executive Order S-3-05 and N-19-19, echo the need to pursue more sustainable development.

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With reference to parking, Caltrans supports reducing the amount of parking whenever possible. Research on parking suggests that abundant car parking enables and encourages driving. Additionally, research looking at the relationship between land-use, parking, and transportation indicates that the amount of car parking supplied can undermine a project’s ability to encourage public transit and active modes of transportation. For any project to better promote public transit and reduce vehicle miles traveled, we recommend the implementation of Transportation Demand Management (TDM) strategies, as discussed in the EIR, as an alternative to building excessive parking

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The DEIR states that “the Project Site is located within one-quarter mile of eight existing Metro bus stops along the following three Metro routes, 117, 211/215, and 212/312. In addition, local transit service to the Project Site would be provided by Metro in the form of future below- and at-grade light rail on the Metro Crenshaw/LAX line, [approximately one mile away], which is currently under construction and expected to be complete and operational in mid-2020. During operation of the Proposed Project, a shuttle pickup and drop-off shuttle service will be provided at the following two Metro rail stations: the existing Metro Green Line – Hawthorne/Lennox Station [approximately two miles away] and the future Metro Crenshaw/LAX Line – Downtown Inglewood Station” (3.2-67).

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Additionally, the Los Angeles County Metropolitan Transit Authority (LACMTA) has identified the Vermont Corridor as a potential option for the implementation of Bus Rapid Transit (BRT) (Vermont BRT Corridor Technical Study – Final Report, 2017). The Vermont BRT would provide another alternative for transportation to and from the IBEC as the Vermont Corridor not only connects to several rail lines, including the Metro Red, Purple, Expo and Green Lines, but also to dozens of other Metro Rapid and local bus lines as well as several major activity centers. Phase 1 of the study has identified Vermont Avenue/Century Boulevard as a potential BRT station, located approximately three miles away from the IBEC. Though this proposed BRT is in the initial stages of implementation, the Lead Agency should take this proposed BRT into account when establishing alternative transit options and implementing first- and last- mile connections to the IBEC.

When establishing the first- and last-mile connections Caltrans recommends improvements that enhance bicycle and pedestrian safety. Caltrans recommends the following multimodal improvements: robust signage, wayfinding, safety improvements, canopy trees, bioswales, permeable paving surfaces, street furniture. These amenities can lead to a comfortable and

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sustainable environment to encourage active transportation modes and improve community health.

Caltrans encourages the Lead Agency to consider any reduction in vehicle speeds in order to benefit pedestrian and bicyclist safety, as there is a direct link between impact speeds and the likelihood of fatality. The most effective methods to reduce pedestrian and bicyclist exposure to vehicles is through physical design and geometrics. Such methods include the construction of physically separated facilities such as Class IV bike lanes, sidewalks, pedestrian refuge islands, landscaping, street furniture, and reductions in crossing distances through roadway narrowing. Visual indicators such as, but not limited to, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, and striping should be used to indicate to motorists that they can expect to see and yield to pedestrians and people on bikes. Maintaining mature street trees and avoiding unnecessary street widening can promote transit use and pedestrian safety.

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Prior to issuance of building or grading permits for the project site, the applicant shall prepare a Construction Transportation Management Plan (CTMP) for review and approval by City staff. The CTMP would include street closure information, detour plans, haul routes, staging plans, parking management plans and traffic control plans. The CTMP would formalize how construction would be carried out and identify specific actions that would be required to reduce adverse effects on the surrounding community. The CTMP should be based on the nature and timing of the specific construction activities and account for other concurrent construction projects near the project site.

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Furthermore, Caltrans recommends that bicycle and pedestrian detours during construction meet or exceed standards required in the California Manual on Uniform Control Devices. Maintaining viable detour routes during construction, that include adequate barriers against motorized traffic, is critical to the safety and comfort of pedestrians and bicyclists.

Please be aware that, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles of State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

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In the spirit of cooperation, Caltrans staff is available to work with your planners and traffic engineers for this project, if needed. If you have any questions, please contact project coordinator Mr. Carlo Ramirez, at [carlo.ramirez@dot.ca.gov](mailto:carlo.ramirez@dot.ca.gov) and refer to GTS# 07-LA-2018-03039.

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Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse