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Cc: [Jose Suarez](#); [Jose Cruz](#); [Andrew Ross](#); [Kent Tsujii](#); [Nilda Gemeniano](#); [Long Thang](#); [Jason Rietze](#); [Alan Nino](#)
Subject: DEIR comments for Inglewood Basketball and Entertainment Center (IBEC)
Date: Thursday, February 6, 2020 8:21:20 AM
Attachments: [ICU Significant Impact Thresholds.pdf](#)

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

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

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

1
general

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 Bl/Gramercy Pl (Intersection #51) at the SE corner and NE corners. Note that although these curb extensions will not impede right-turning vehicles, please include a comment to the consultant to ensure that de-facto right turn lanes were not assumed at this intersection in their LOS calculations.

2
traffic



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 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, Pg. 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 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, Pg. 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, Pg. 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, Pg. 3.9-29 to 30

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

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

2 con't traffic

3 GHG

4 Hydro

6. **3.14 Transportation and Circulation, 3.14.1 Environmental Setting, Operation, Pg. 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 Blvd and Van Ness Ave
- Intersection #66 - Lennox Blvd and Freeman Ave
- Intersection #74 - Hawthorne Blvd and WB 105 off-ramp

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Traffic

7. **Summary, Summary Table S-2, 3.14 Transportation and Circulation (b), Pg. 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 comments 6 and 7, please contact Andrew Ross of Public Works, Transportation Planning and Programs Division at (626) 300-4586 or aross@pw.lacounty.gov.

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Traffic

8. **3.14 Transportation and Circulation, 3.14.4 Analysis Impacts and Mitigation through 3.14.5 Analysis Impacts and Mitigations with Concurrent Events**

The DEIR only considers LOS 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 attached 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 8, please contact Kent Tsujii of Public Works, Traffic Safety and Mobility Division at (626) 300-4776 or ktsujii@pw.lacounty.gov.

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Traffic

9. **3.15 Utilities and Service Systems, 3.15.16 Impact and Mitigation (Impact 3.15-11), Operation, Pg. 3.15-80 to 81**

The document should clarify how the venue will comply with existing AB 1826 (2014) law and future pending organic waste regulations per SB 1383 (2016). By the time the project is constructed, onsite facilities are expected to generate organic waste and will need to have systems in place to recycle their organic waste. Per SB

8
Utilities

1383 regulations, the venue may be required to implement a food recovery program as a Tier 2 edible food waste generator.

8 con't
Utilities

10. 3.15 Utilities and Service Systems, 3.15.15 Regulatory Setting, State, Pg. 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."

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Utilities

For questions regarding comments 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.

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general

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)