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**Letter**            **David Pettit, Natural Resources Defense Council (NRDC)**  
**NRDC**            **March 24, 2020**  
**Response**

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- NRDC-1            This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments NRDC-2 through NRDC-12.
- NRDC-2            The Proposed Project analyzed in the City of Inglewood’s Draft EIR is the same as that analyzed ~~and certified by~~ the California Air Resources Board (CARB) ~~and certified by the Governor~~ under AB 987. The Proposed Project evaluated in the Draft EIR and under AB 987 includes the same physical facilities, consisting of an arena with up to 18,000 fixed seats plus capacity to add up to 500 temporary seats; 71,000 sf LA Clippers Office Space; 85,000 sf LA Clippers Team Practice and Training Facility; 25,000 sf Sports Medicine Clinic; 15,000 sf Community Space; 48,000 sf of commercial ~~retail and dining uses (including~~ ~~and 15,000 sf of restaurant/bar uses), and a hotel with up to 150 rooms, and the same operational characteristics, including~~ ~~anticipated~~ event schedules, frequencies, and attendance. In addition, the Draft EIR and the AB 987 analyses each use a “no net new” emissions threshold to determine the GHG emissions impact of the Proposed Project, and the mitigation measures in the Draft EIR demonstrate how the Proposed Project would achieve that goal. However, the analyses undertaken by the City and CARB differ in their emissions estimation methods and in their specific requirements for meeting the no net new threshold. In addition, the CARB AB 987 review and certification process completed in late 2019, resulted in certain additional commitments to implement emissions reduction measures required pursuant to the provisions of AB 987. ~~Many of which these measures were not assumed considered to be in the Proposed Project in the Draft EIR analysis, which was initiated in 2018 after issuance of the NOP, and will be required by the City as conditions of approval if the Proposed Project is approved.~~
- The key factors contributing to a difference in analytical results between the Draft EIR and the AB 987 filings are the methods for quantifying emissions impacts and determining mitigation requirements. These analytical differences occur because the preparation of an EIR as required under CEQA and certification under AB 987 serve different purposes with different requirements, and because the City of Inglewood and CARB are different agencies, each with

the discretion to guide and implement an analytical approach that fits its respective legal obligations.

The primary quantitative difference in net operating emissions results from the use of different comparison points, or baselines, to determine net new GHG emissions over the 30-year period of operations analyzed for the Proposed Project in the AB 987 analysis and the Draft EIR. The AB 987 analysis evaluates net new GHG emissions compared to a fixed point in time when the NOP of the Proposed Project was issued in 2018 (a “static baseline”). This is the typical approach that CARB has approved in considering the evaluations of projects pursuant to CEQA judicial streamlining legislation, such as AB 900 and AB 987.

The Draft EIR analysis provides a year-by-year comparison that accounts for the anticipated change over time in CO<sub>2</sub>e emissions intensity factors for electricity (due to the Renewables Portfolio Standard) and mobile sources due to State and federal regulations for vehicle efficiency. In other words, the baseline is adjusted annually. As a result, the Draft EIR analysis indicates that the baseline emissions of the Proposed Project in the first full year of operation are approximately 3,200 MT CO<sub>2</sub>e lower than AB 987’s static baseline, and this annual difference increases over time, to nearly 6,300 by year 2054. Over the 30-year analytical life of the Proposed Project, this difference results in the Draft EIR baseline GHG emissions being approximately 166,000 MT CO<sub>2</sub>e lower than the 30-year baseline emissions under the AB 987 analysis, which represents the vast majority of the difference cited in the comment. Because the Draft EIR uses a lower figure to represent “baseline emissions,” the Draft EIR concludes that the net new emissions of the Proposed Project would be higher by a like amount. That, in turn, means that the Proposed Project must provide more mitigation in order reduce Proposed Project emissions to less than the “no net increase” significance threshold. The effect of the City’s approach, as reflected in the EIR, is to increase the Proposed Project mitigation obligations to achieve a less-than-significant impact under the no-net-increase threshold.

The sole purpose of the AB 987 certification process is to determine if the Proposed Project qualifies for judicial streamlining of CEQA legal challenges or other legal challenges if the Proposed Project is approved. AB 987 requires the project applicant to adhere to certain guidelines for streamlining certification, which guided the content of the AB 987 application. AB 987 does not affect or change any of the substantive requirements for preparation or content of an EIR.

The AB 987 certification process resulted in specific commitments to local direct GHG emission reduction measures which, if the Proposed Project is approved, are required to be imposed as conditions of approval. Mitigation



Measure 3.7-1(b) does not specifically mandate these particular measures, because it was not required to do so under CEQA in order to achieve net zero emissions, which would reduce Impact 3.7-1 to insignificance. Mitigation Measure 3.7-1(b) is consistent with the AB 987 reduction measures, and both Mitigation Measure 3.7-1(b) and the AB 987 commitments are intended to achieve net zero emissions under their respective methodologies.

The AB 987 and Draft EIR approaches and emissions reductions measures are complementary. Mitigation Measure 3.7-1(a) would require, if determined necessary, further emissions reduction measures beyond those committed to and required through the AB 987 certification process. For further detailed explanation of the Draft EIR approach to GHG mitigation, see Response to Comment NRDC-9. Further details regarding consistency with AB 987 can be found in Response to Comment NRDC-5, below.

NRDC-3

The City of Inglewood has yet to consider and make a determination on the merits of the Proposed Project. The publication of the Draft EIR is a key part of a process in which the City, as CEQA Lead Agency, evaluates and considers information regarding the potential significant environmental impacts of a proposed action. The general policy language of CEQA establishes that “[t]he purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided” (see California Public Resources Code (PRC) section 21002.1(a)). The City is required to “mitigate or avoid significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so” (see PRC section 21002.1(b)). And under CEQA, if conditions exist that make mitigation or avoidance of significant impacts infeasible, “a project may nonetheless be carried out or approved at the discretion of the public agency if the project is otherwise permissible under applicable laws and regulations” (see PRC section 21002.1(c)).

This general CEQA policy is being implemented by the City and with the publication of this Final EIR, the City is in the process of completing the EIR which provides meaningful disclosure of the significant environmental impacts of the Proposed Project, as well as ways to substantially lessen or avoid those impacts through the adoption of feasible mitigation measures or alternatives to the Proposed Project.

As defined in CEQA Guidelines section 15002(f), an EIR is the public document used by the governmental agency to analyze and disclose the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the possible environmental

damage. The Draft EIR and Final EIR are not decision documents and do not approve or provide support for or opposition to the Proposed Project. The Draft EIR identifies significant and unavoidable environmental impacts that are likely to result from the Proposed Project in the following places:

- Page ii of the Table of Contents for the Draft EIR identifies the location, in Chapter 4, of the list of Significant Environmental Effects That Cannot Be Avoided if the Proposed Project is Implemented;
- Pages S38-S41 of the Draft EIR provides a list of the significant and unavoidable environmental effects that may result from the Proposed Project;
- Table S-2, Draft EIR, pages S-53 through S-108, presents every significant impact and associated mitigation measure disclosed in the Draft EIR, including impacts that would be significant and unavoidable;
- Chapter 3 of the Draft EIR provides detailed technical analyses of environmental impacts, identifying which impacts would be significant and unavoidable;
- Pages 4-1 through 4-5 provides a list of the significant unavoidable impacts that may occur as a result of the Proposed Project on pages 4-1 through 4-5; and
- Pages 6-5 through 6-8 of the Draft EIR provides a list of the significant and unavoidable environmental effects that may result from the Proposed Project.

As demonstrated above, the identification of significant and unavoidable environmental effects occurs in multiple locations in the Draft EIR consistent with the City's requirement under CEQA to disclose the identification of such effects in an EIR.

The Draft EIR for the Proposed Project does not and cannot contain or identify statements of overriding considerations as asserted in the comment because the City has not yet reached a point in the process where it has determined whether to proceed with the Proposed Project. However, the comment refers to the document in which the City, if it ultimately determines to approve the Proposed Project, would disclose its reasons for approval despite the recognition that doing so would create significant environmental impacts. The adoption of such a document would be part of a process specifically outlined in CEQA (see CEQA Guidelines sections 15092 and 15093).

CEQA Guideline section 15092(b)(2)(B) specifically recognizes that a public agency may determine that unavoidable significant impacts are acceptable in light of other benefits that are created by the project. In this way, CEQA recognizes that environmental impacts are one of a number of factors that may

be considered by an agency in deciding whether to approve a proposed project, and reflects that it is within the discretion of the City to determine whether to approve the Proposed Project. CEQA Guidelines section 15093(a) states:

*CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."*

In such a case, CEQA establishes a process through which the lead agency must disclose its reasoning for deciding to proceed with a project despite the recognition of unavoidable significant impacts. Pursuant to CEQA Guideline section 15093(b),

*When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations shall be supported by substantial evidence in the record.*

Thus, the CEQA Guidelines describe the requirement of the City of Inglewood, as the CEQA lead agency, to support a statement of overriding considerations with substantial evidence in the record. If the City Council approves the Proposed Project, ~~choosing to adopt despite the~~ significant and unavoidable impacts identified in the Draft EIR and Final EIR, inclusion of a required statement of overriding considerations would be an articulation of the Council's decision that other benefits provided by the Proposed Project outweigh the significant and unavoidable physical environmental effects that would result from the Proposed Project.

The commenter's opinion as to the merits of the Proposed Project is noted and will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project. However, it is important to recognize that an arena of the type included in the Proposed Project would provide opportunities for people, including residents of the City of Inglewood, across the economic spectrum. The Proposed Project would include components that allow for other uses, in addition to serving attendees of professional basketball games.

In addition, the project applicant and the City have negotiated a “public benefits” package of \$100 million. If the Proposed Project is approved by the City Council, these benefits would include up to \$80 million in programs for the construction of affordable housing and assistance for first-time homebuyers and renters; the balance of \$20 million would fund programs for students, families and seniors. The elements of this package would be part of the entitlement package presented to the City Council for its consideration.

In addition, the Draft Development Agreement includes a number of provisions that would have benefits to the local community irrespective of the ability to afford tickets to events at the Proposed Project. Among other things, the Draft Development Agreement would require the dedication of 100 general admission tickets to every LA Clippers basketball regular season home game for use by a community group at no charge. Another provision would allow the use of the Arena by the City, local schools, youth athletic programs, or local community-based charitable organizations designated by the City for up to 10 days per year on days that the Arena or surrounding facilities are available.

The public benefits package, along with the proposed Development Agreement, would be made available for public review prior to its consideration by the City Council, pursuant to the requirements of the California Government Code.

In addition, as is identified in Table 2-3, on page 2-50 of the Draft EIR, ~~it is projected that LA Clippers basketball games would make up only an average of 4%~~ 42% of the annual events at the proposed Arena, with ~~another up to 188-178 other events anticipated.~~ events including concerts, family shows, other sporting events, and corporate or community events. Further, the Proposed Project would include a variety of other uses that would be accessible to local residents, including an outdoor plaza. (see Table 2-2, on page 2-18 of the Draft EIR).

The accessibility of the Proposed Project, and the value of the uses that would be provided, is one of the factors that the City Council will consider, along with the information provided in the EIR and other social and economic factors in determining its decision to approve or deny the Proposed Project.

NRDC-4

The comment raises questions about a range of issues, including environmental justice, gentrification and displacement, the applicability of National Environmental Policy Act (NEPA) to FAA actions related to the Proposed Project, the consistency of the Draft EIR with a July 2012 document prepared by the California Department of Justice that explains legal background and responsibilities for the consideration of environmental justice in CEQA documents, and potential recirculation of the Draft EIR. Although CEQA does

not require the discussion or analysis of environmental justice, each of the issues referred to in the comment are addressed below.

### **Environmental Justice**

Environmental justice relates to the fair treatment of all people with respect to environmental laws, regulations, and policies. One key aspect of environmental justice involves everyone having the same level of protection from environmental hazards. In many communities, there are areas which have a clean environment and high quality of life compared to other areas that may face environmental pollution and lack beneficial resources, such as parks and sidewalks. The second types of areas are often occupied by low-income residents who may lack resources and the ability to influence their environment. These areas are called “disadvantaged communities” and are required to be addressed in the general plan. According to the City of Inglewood’s proposed General Plan Environmental Justice Element, the Project Site and neighborhoods south and west of the Project Site are disadvantaged communities.<sup>1</sup>

Environmental justice has also been described as the right for people to live, work and play in a community free of environmental hazards. The issue of environmental justice, as it is defined in California law, is not a required to be a separate component of analysis in an EIR. In particular, questions of social and economic effects have a circumscribed role within CEQA. CEQA Guidelines section 15131 allows the approving agency to include or present economic or social information in an EIR, but Guidelines section 15131(a) limits the consideration of such factors in the assessment of significant impacts, stating:

*Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

<sup>1</sup> City of Inglewood, *General Plan Environmental Justice Element*, recommended for approval by the Planning Commission on May 5, 2020, p. 7.

An explanation of this circumscribed consideration of social and economic effects, including community character,<sup>2</sup> is presented on page 3.12-16 of the Draft EIR which states:

As described above, in general CEQA does not require analysis of socioeconomic issues such as gentrification, displacement, environmental justice, or effects on “community character.” The CEQA Guidelines state, however, that while the economic or social effects of a project are not appropriately treated as significant effects on the environment, it is proper for an EIR to examine potential links from a proposed project to physical effects as a result of anticipated economic or social change.

There are, however, a number of issues that are pertinent to the question of environmental justice that are addressed under CEQA and are considered in the Draft EIR, including discussions in the air quality, noise, hydrology and water quality, hazards and hazardous materials, population, employment and housing, transportation, and Other CEQA Considerations technical sections. More specifically, the Draft EIR includes discussion of environmental-justice-related issues in the following places:

- Draft EIR, Section 3.2, Air Quality, includes analysis of the potential for the Proposed Project to result in localized air pollutant emissions or odor emissions that could affect surrounding populations;
- Draft EIR, Section 3.8 Hazards and Hazardous Materials, analyzes the potential for the Proposed Project to result in exposure of nearby people to a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Draft EIR, Section 3.9, Hydrology and Water Quality, includes an analysis of the potential for the Proposed Project to affect water quality and impact the local drainage infrastructure, which also serves surrounding communities;
- Draft EIR, Section 3.10, Land Use and Planning includes an analysis of the potential for the Proposed Project to divide established communities and conflict with existing land use plans;
- Draft EIR, Section 3.11, Noise and Vibration, includes an analysis of the potential for the Proposed Project to generate construction or operational

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<sup>2</sup> The consideration of community character as an impact is not overtly addressed in the CEQA Guidelines, but was the focus of the case of *Preserve Poway v. City of Poway* (March 9, 2016) 245 Cal. App.4th 560, in which the California Court of Appeal, Fourth Appellate District, concluded that “the superior court erred in determining an EIR was required to study the psychological and social impacts discussed at the public hearings and related e-mails by project opponents in this case. CEQA requires decisions be informed and balanced, but it ‘must not be subverted into an instrument for the oppression and delay of social, economic . . . development or advancement.’ (Guidelines, § 15003, subd. (j).)”

noise or vibration that would ~~result in the most intense~~ most intensely affect ~~occurring to~~ nearby sensitive receptors;

- Draft EIR, Section 3.12, Population, Employment, and Housing, includes an analysis of the potential for the Proposed Project to result in direct or indirect displacement of a substantial number of people or housing from the areas surrounding the Project Site;
- Draft EIR, Section 3.14, Transportation and Circulation, includes an analysis of the potential for the Proposed Project to affect local roadways and intersections, access to transit, and pedestrian and bicycle mobility, which would have the greatest effect on nearby residences and businesses;
- Draft EIR, Section 4.4 provides an analysis of growth-inducing effects, including the potential for the Proposed Project to cause increased activity in the local or regional economy; and
- Draft EIR, Section 4.5 provides an analysis of the potential for Proposed Project to result in economic impacts of such severity that they would lead to significant business closures and subsequent urban decay effects.

In 2016, the State of California passed Senate Bill 1000 (SB 1000) which established California Government Code section ~~65040.12~~ 65302(h) requiring cities and counties to address environmental justice in their general plans. Cities and counties may choose to adopt a separate standalone Environmental Justice Element or address environmental policies throughout the General Plan. The City of Inglewood Planning Commission recommended adoption of an Environmental Justice Element on May 5, 2020, and the City Council adopted the Environmental Justice Element on May 26, 2020, ahead of State-mandated deadlines.

The approved Environmental Justice Element includes a comprehensive set of goals and policies that address meaningful public engagement, land use and the environment, mobility and active living, access to healthy food, healthy and affordable housing, and public facilities. The Element sets forth goals and policies related to environmental justice in the City, particularly for disadvantaged communities, aimed at increasing the influence of target populations in the public decision making process and reducing their exposure to environmental hazards. The consistency of the Proposed Project with the City Environmental Justice Element, along with all other goals and policies of the General Plan, will be addressed in staff reports to the Planning Commission and the Inglewood City Council as part of the consideration of the merits of the Proposed Project.

### **Gentrification and Indirect Housing Displacement**

The discussion of Impact 3.12-2, on pages 3.12-15 through 3.12-17 of the Draft EIR, provides a project-specific analysis of the potential for the Proposed

Project to displace a substantial number of existing people or housing units necessitating the construction of replacement housing elsewhere. The impact analysis on page 3.12-16 includes a discussion of indirect displacement, identifying the City's efforts to determine if there is evidence to suggest that gentrification and indirect housing displacement are foreseeable socioeconomic effects pursuant to development of the Proposed Project. Page 3.12-16 identifies that the City's efforts to identify such evidence were intended to address several comments on the NOP, requesting that the City consider the potential for the Proposed Project to indirectly cause displacement of housing and residents as a result of it causing the process of gentrification. To support its evaluation of potential indirect displacement, the City undertook a detailed study, conducted by ALH Urban & Regional Economics (the ALH Report) included in the Draft EIR as Appendix S, to consider and disclose anticipated impacts related to indirect displacement. As described on page 2 of the ALH Report, the purpose of the report is to specifically probe the local context of whether displacement effects arising from gentrification leading to the construction of new housing are likely outcomes pursuant to development of a new sports and entertainment venue in Inglewood.

The Draft EIR provides an analysis of the potential for gentrification and displacement effects associated with the Proposed Project on pages 3.12-16 through 3.12-17. The final paragraph on page 3.12-17 is the City's conclusion, which states the following:

The City's report examined numerous studies of the effects of sports facilities on property values and other effects that can be part of gentrification. The report concludes that neither the gentrification literature nor an analysis of housing cost changes over time provide evidence that development of a professional sports stadium or arena like the Proposed Project causes or contributes to gentrification that could result in physical displacement of existing residents. As a result of a lack of evidence to connect the Proposed Project to gentrification and related displacement that could result in the need for the construction of replacement housing, this impact is **less than significant**.

Pages 3.12-20 through 3.12-22 of the Draft EIR discuss the potential for indirect displacement of a substantial number of people or housing units necessitating the construction or replacement of housing elsewhere, as part of the Impact 3.12-4 discussion. The analysis relies on the ALH Report to conclude that there is no evidence directly connecting increase in housing prices in Inglewood to substantial housing displacement that would result in the need for construction of new housing. No evidence in the record supports a conclusion that a new sports venue would indirectly contribute to such effects that would result in



displacement of existing housing units or residents in such substantial numbers that the construction of new housing elsewhere would be necessitated.

#### ***Applicability of NEPA to FAA Actions***

The Proposed Project is not subject to the requirements of the NEPA, which requires that a federal lead agency address environmental justice impacts resulting from a project that constitutes a major federal action or that has a federal nexus as a result of a federal agency approval, funding, permit, or similar action. The Proposed Project is not subject to FAA approval as a result of the proximity of the Project Site to the Los Angeles International Airport. Draft EIR, Section 3.8, Hazards and Hazardous Materials, page 3.8-22, describes the applicability of Federal Aviation Regulations Part 77, Safe, Efficient Use and Preservation of Navigable Airspace, defining the FAA's role as follows:

Part 77 stipulates that any proposed construction or alteration that is more than 200 feet above ground level (AGL) at its site, or that would exceed the established imaginary surfaces of an airport triggers a requirement to notify the FAA through its Obstacle Evaluation/Airport Airspace Analysis (OE/AAA) system or by filing Form 7460-1, "Notice of Proposed Construction or Alteration," (Form 7460-1), often referred to as a 7460-1 application. This notification prompts the FAA to conduct an aeronautical study to determine whether a project would constitute a hazard to air navigation. During such an aeronautical study, the FAA would evaluate the potential of a project to impact air traffic operations at both airports as well as nearby communication, navigation, and surveillance systems. Furthermore, the ALUP includes policies requiring compliance with Part 77.

Part 77 includes a large number of criteria that protect the airspace around an airport. The most relevant of these to the Project Site include notification criteria, horizontal imaginary surface criteria, and obstacle clearance surface criteria...

The FAA review and determination regarding the Proposed Project is a technical evaluation and advisory action that pertains to the potential for the Project to constitute a hazard to air navigation. The Impact 3.8-5 discussion in the Draft EIR analyzed the potential for the Proposed Project to result in a safety hazard for people residing or working in the project area or the potential for the Proposed Project to create a hazard to navigable airspace and/or operations at a public airport and determined that the Proposed Project could exceed three criteria that require notification of, and evaluation by, the FAA. Mitigation Measure 3.8-5 would require the project applicant to submit the Form 7460-1 and complete the FAA review process, consistent with the requirements of Code

of Federal Regulations Part 77, and make necessary adjustments to the Proposed Project, including project construction plans, to comply with the findings and recommendations of an FAA-initiated aeronautical study. For additional discussion of the status of Form 7460-1 submittals for the Proposed Project, please see Responses to Comments FAA-2 and ALUC-2.

FAA Order 1050.1F serves as the FAA's policy and procedures for compliance with NEPA and implementing regulations issued by the Council on Environmental Quality (CEQ).<sup>3</sup> The order establishes FAA actions that are subject to NEPA review, including, but not limited to, grants, loans, contracts, leases, construction and installation actions, procedural actions, research activities, rulemaking and regulatory actions, certifications, licensing, permits, plans submitted to the FAA that require FAA's approval, and legislation proposed by the FAA. Order 1050.1F section 2-1.2 identifies FAA actions that are not subject to NEPA review. According to section 2-1.2(b),

*Some Federal actions are of an advisory nature. Actions of this type are not considered major Federal actions under NEPA, and NEPA review is therefore not required. If it is known or anticipated that some subsequent Federal action would be subject to NEPA, the FAA must so indicate in the advisory action. Examples of advisory actions include:*

*(1) Determinations under 14 CFR part 77, Safe, Efficient Use, and Preservation of the Navigable Airspace."<sup>4</sup>*

Thus, pursuant to Order 1050.1F 2-1.2(b)(1), the FAA study and recommendations pursuant to FAR Part 77 are advisory actions that are not subject to NEPA review. Therefore, the FAA review process in response to the submittal of a Form 7460-1 does not represent a major federal action and does not result in a federal nexus that would require compliance with NEPA.

#### ***California Department of Justice Legal Background on Environmental Justice in CEQA***

The comment refers to the 2012 State of California Department of Justice document entitled *Environmental Justice at the Local and Regional Level (Legal Background)*.<sup>5</sup> The document explains two sources of environmental justice-related responsibilities for local governments which are contained in the Government Code and in CEQA. The Legal Background describes how local governments can further environmental justice by following well-established

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<sup>3</sup> U.S. Department of Transportation, Federal Aviation Administration, *Order 1050.1F, Environmental Impacts: Policies and Procedures*, July 16, 2015.

<sup>4</sup> U.S. Department of Transportation, Federal Aviation Administration, *Order 1050.1F, Environmental Impacts: Policies and Procedures*, July 16, 2015, p. 2-1.

<sup>5</sup> State of California Department of Justice, Kamala Harris, Attorney General, *Environmental Justice at the Local and Regional Level Legal Background*, July 10, 2012.

CEQA principles. In defining the purpose of CEQA, the Legal Background states that specific provisions of CEQA and the State CEQA Guidelines require that local lead agencies consider how the environmental and public health burdens of a project might specially affect certain communities, citing examples including: (1) Environmental Setting and Cumulative Impacts, (2) The Role of Social and Economic Impacts Under CEQA, (3) Alternatives and Mitigation, and (4) Transparency in Statements of Overriding Consideration. Each of these discussions are addressed below, along with an explanation of how the issue was addressed in the Draft EIR.

*1) Environmental Setting and Cumulative Impacts*

The Legal Background identifies relevant case law and the CEQA Guidelines (as applied in 2012) to direct lead agencies to take special care to determine whether a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive setting be significant. The Legal Background also identifies that lead agencies are required under CEQA to consider whether a project's effects, while they might appear limited on their own, are "cumulatively considerable" and therefore significant. The Legal Background cites PRC section 21083, subd. (b)(3) as:

*[requiring] a local lead agency to determine whether pollution from a proposed project will have significant effects on any nearby communities, when considered together with any pollution burdens those communities already are bearing, or may bear from probable future projects. Accordingly, the fact that an area already is polluted makes it more likely that any additional, unmitigated pollution will be significant. Where there already is a high pollution burden on a community, the "relevant question" is "whether any additional amount" of pollution "should be considered significant in light of the serious nature" of the existing problem.*

The Draft EIR analyzed the localized effects of construction and operations of the Proposed Project, related to NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions and toxic air contaminant concentrations, to determine if the Proposed Project would generate significant localized air quality impacts that could substantially affect air quality sensitive receptors in the vicinity of the Project Site. Page 3.2-46 of the Draft EIR identifies the methodology in identifying the study area for localized impacts:

The localized off-site emissions analysis focused on an approximately 1.3-mile radius from the Project Site, referred to as the local study area, rather than the full trip length assumed under the regional construction and operational emission calculations.<sup>137</sup> The local study area was the focus of this analysis because it would result in the highest incremental

increase in ambient air pollution concentration due to capturing the emission from the Proposed Project on-site site construction, on-site operations, and the four intersections experiencing the maximum traffic volumes surrounding the Project Site.

(Footnote 137: In compliance with PRC § 21151.8 (a)(2).)

It should be noted that within the 1.3-mile radius studied in the Draft EIR are portions of the City of Inglewood that are identified as disadvantaged communities in the City's recently adopted General Plan Environmental Justice Element.

Chapter 3.14 of the Draft EIR, Transportation and Circulation, described the Proposed Project's anticipated travel characteristics and presented the impacts of the Proposed Project on the roadway, bicycle, pedestrian and transit systems in the approximately 20-square mile study area, which included a total of 114 study intersections and 28 neighborhood street segments, including the corridors connecting the major freeways that would provide regional access to the Proposed Project, as summarized on page 3.14-1 of the Draft EIR and included in Draft EIR, Appendix K. Substantial portions of the transportation study area are classified as disadvantaged communities, including the western and southern portion of the City of Inglewood, parts of Lennox, Hawthorne, the City of Los Angeles, and the County of Los Angeles.

The above are examples of the City's substantial efforts to appropriately disclose potential impacts to nearby sensitive receptors, including disadvantaged communities in proximity to the Project Site. The technical sections in Chapter 3 of the Draft EIR included analyses that addressed the impact of the Proposed Project in combination with existing and cumulative conditions on sensitive environmental receptors. For these reasons, the Draft EIR is consistent with the direction of the Legal Background as it relates to environmental setting and cumulative impacts.

#### *2) The Role of Social and Economic Impacts Under CEQA*

The Legal Background explains that economic and social effects may be relevant in determining significance of adverse physical environmental effects under CEQA in two ways:

- Social or economic impacts may lead to physical changes to the environment that are significant; and
- The economic and social effects of a physical change to the environment may be considered in determining whether that physical change is significant.

As an example of the ways in which social or economic impacts may lead to physical changes to the environment, the Legal Background identifies physical deterioration at closed businesses resulting from economic harm caused by a proposed development (i.e. urban decay), as an example of such an impact.

Draft EIR, Chapter 4, Other CEQA Required Considerations, pages 4-15 to 4-22, analyzes the potential for the Proposed Project to result in urban decay effects related to the addition of a sports and entertainment arena and commercial space to the market areas for both types of uses. The analysis of potential urban decay effects utilized a detailed study, conducted by Stone Planning LLC (included in Draft EIR, Appendix R) to evaluate the potential economic impacts of addition of a new arena to the existing arena market. The conclusions of the analyses of urban decay, both in terms of additional sports and entertainment facilities and the addition of retail commercial space in the Project, determined that there was no evidence in the record to support a conclusion that the economic competition generated by the Proposed Project would result in significant environmental impacts.

### *3) Alternatives and Mitigation*

#### **Alternatives**

The Legal Background explains that where a local agency has determined that a project may cause significant impacts to a particular community or sensitive subgroup, the alternatives and mitigation analyses should address ways to reduce or eliminate the project's impacts to that community or subgroup. Depending on the circumstances of the project, the local agency may be required to consider alternative project locations or alternative project designs.

The Draft EIR includes a detailed analysis of a total of seven (7) project alternatives, in response to the significant impacts resulting from the Proposed Project. Draft EIR, Chapter 6, Project Alternatives, Section 6.3, Alternatives Considered but Dismissed from Further Evaluation of the identified and discussed alternatives that were considered but dismissed from further evaluation. Draft EIR, Chapter 6, Project Alternatives, Sections 6.4 through 6.6 identifies, analyzes, and compares seven alternatives to the Proposed Project, which include:

- Alternative 1: No Project Alternative (see Draft EIR, pages 6-22 to 6-23);
- Alternative 2: Reduced Project Size Alternative (see Draft EIR, pages 6-23 to 6-31);
- Alternative 3: City Services Center Alternative Site (see Draft EIR, pages 6-31 to 6-43);

- Alternative 4: Baldwin Hills Alternative Site (see Draft EIR, pages 6-44 to 6-56);
- Alternative 5: The District at South Bay Alternative Site (see Draft EIR, pages 6-56 to 6-69);
- Alternative 6: Hollywood Park Specific Plan Alternative Site (see Draft EIR, pages 6-69 to 6-81); and
- Alternative 7: The Forum Alternative Site (see Draft EIR, pages 6-81 to 6-96).

The alternatives analysis in the Draft EIR specifically considers the impacts to the surrounding community, as discussed above, which demonstrates the consistency of the City’s approach in the Draft EIR with the Legal Background.

### **Mitigation**

The Legal Background discusses the process of development of potentially feasible mitigation measures as intended to be an open process that also involves other interested agencies and the public, in addition to the project proponent and lead agency. It explains that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. As part of the enforcement process, in order to ensure that the mitigation measures and project revisions identified in the EIR are implemented, the local agency must adopt a program for mitigation monitoring and reporting (see CEQA Guidelines section 15097).

The City of Inglewood has included interested agencies and the public in the process of identifying the scope of the Draft EIR and provided an extended opportunity (a total of 89 days) for interested agencies and the public to provide comment on the Draft EIR, including proposed mitigation measures for potentially significant effects identified in its analysis. In addition, during the process of development of the Draft EIR and this Final EIR, the City of Inglewood has conducted more than 20 meetings with responsible and other interested and affected agencies, including, but not limited to, the South Coast Air Quality Management District, Caltrans, the Los Angeles County Airport Land Use Commission, the City of Los Angeles, the Los Angeles County Metropolitan Transportation Authority, the City of Hawthorne, and the Gabrieleno Band of Mission Indians – Kizh Nation. If the City Council chooses to approve the Proposed Project, the approval would include adoption of a Mitigation Monitoring and Reporting Program, which would include the identification of the actions and responsibilities associated with implementation and monitoring of required mitigation measures and other project design features required to avoid or lessen the severity of significant impacts of the Proposed Project. Impacts to a particular disadvantaged community or sensitive

subgroup, would be addressed by the mitigation monitoring and reporting program.

#### *4) Transparency in Statements of Overriding Consideration*

The Legal Background defines the role of the lead agency in balancing a variety of public objectives, including economic, environmental, and social factors along with the goal of providing a decent home and satisfying living environment for every Californian. The document describes the discretion provided to the lead agency pursuant to CEQA to approve a proposed project, and identifies the requirement of the lead agency, if it chooses to approve a project for which significant and unavoidable impacts would result, to provide a statement of overriding considerations that discloses in writing, based on substantial evidence in the record, its reasons for finding the significant and unavoidable impacts acceptable.

As is described in the Response to Comment NRDC-3, above, the identification of significant and unavoidable environmental effects occurs in multiple locations, consistent with the City's requirement to disclose the identification of such effects in an EIR. If the City Council chooses to approve the Proposed Project, despite the significant and unavoidable impacts that would occur as a result of the Proposed Project, then pursuant to CEQA Guidelines section 15093, the Council would include a Statement of Overriding Considerations in its record of approval and in the Notice of Determination. The Statement of Overriding Considerations would be consistent with the requirements of CEQA Guidelines section 15093, and in doing so, would be consistent with the direction of the Legal Background.

#### **Recirculation of the Draft EIR**

Pursuant to CEQA Guideline 15088.5(a), if significant new information is added to the EIR after publication of the Draft EIR but before certification, some or all of the EIR may be required to be recirculated for public review and comment. The term "significant new information" is precisely defined under CEQA to include:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

In particular, CEQA Guideline 15088.5(b) clarifies that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

While the comment asserts that the Draft EIR should be recirculated in order to address environmental justice issues, it does not identify significant new information related to the Proposed Project that has not already been addressed in the Draft EIR,

As described above, the Draft EIR adequately addresses and analyzes environmental impacts as they relate to environmental justice. The Draft EIR provides analysis of project-specific and cumulative impacts that would result from the Proposed Project, identifying and evaluating the effects of feasible mitigation on potentially significant impacts, disclosing all significant and unavoidable environmental impacts, and analyzing feasible alternatives to ~~avoid~~ ~~or reduce~~ significant and unavoidable environmental impacts. As described above, the Draft EIR is consistent with the Legal Background document, Environmental Justice at the Local and Regional Level, provided by the California Department of Justice, which provides direction to CEQA lead agencies regarding their role in ensuring environmental justice for all California residents.

The Final EIR provides responses to all written comments on the Draft EIR. In responding to those comments, the City has at points provided additional clarification or expanded upon information and analyses provided in the Draft EIR. In several locations, minor edits have been made to the language of the Draft EIR in order to correct inadvertent errors, to provide clarification, or reflect information provided by commenters. However, neither the content of the responses to comments, nor the editorial changes made to the language of the Draft EIR constitute “significant new information” as defined in Guideline 15088.5(a). Therefore, there is no requirement for recirculation of the EIR.

NRDC-5

The City carefully examined the question of backfill, the process of reuse of space or event dates associated with uses that under the Proposed Project would relocate to the Project Site from other locations in the Los Angeles region. The relocated uses or events include LA Clippers NBA basketball games currently hosted at the Staples Center, as well as concerts and other arena events that would otherwise occur at other venues, the LA Clippers team administrative offices, and the LA Clippers practice and training facility (see “Methodology



and Assumptions” discussion provided in Draft EIR, Section 3.7 Greenhouse Gas Emission, page 3.7-32).

The Draft EIR presents a full backfill scenario, consistent with the AB 987 full backfill scenario, as well as a partial backfill scenario that is based on independent market analyses completed in 2019 by Conventions, Sports and Leisure (CSL) and Stone Planning, as referenced in the Draft EIR (see “Methodology and Assumptions” discussion provided in Draft EIR, Section 3.7 Greenhouse Gas Emissions, page 3.7-32). The Draft EIR includes the partial backfill scenario to illustrate a reasonable expectation of what may transpire based on these studies. The City believes that the partial backfill scenario is reasonable because of the following facts:

- With the move of the LA Clippers from Staples Center to the Proposed Project, it is not reasonable to assume ~~the location of a comparable that another NBA or other comparable major league sports team into would occupy those vacated dates at Staples Center;~~
- As the third tenant in Staples Center, many of the dates vacated by the LA Clippers are secondary dates when another major event (NBA LA Lakers or NHL LA Kings games) occurs later in the day, relegating the LA Clippers to an afternoon game time rather than the prime evening game time. These types of available dates are not likely to be used for such types of events as concerts, family shows, or other events that require reconfiguration of the event floor at Staples Center; and
- A number of the LA Clippers vacated dates are early weeknight dates (Monday through Thursday). Based on evaluation of the pattern of concert and other event activity in the LA metropolitan region, the majority of desirable dates for major concerts and other events are weekend dates (Friday through Sunday), and as such early weeknight dates are not as readily or reliably backfilled.

The Draft EIR analyzes both a partial backfill scenario and a full backfill scenario because the backfill of arena-type events is inherently dynamic and unpredictable, and to be fully understood must be monitored and verified in real time. Irrespective of whether ~~the any future backfill of vacated LA Clippers event days at Staples Center backfill scenario~~ more closely resembles the partial or full backfill scenarios presented in the Draft EIR, Mitigation Measures 3.7-1(a) (page 3.7-58) and 3.7-1(b) (page 3.7-64) would require achievement of net zero GHG emissions based on the emissions accounting provided by the project applicant in its Annual GHG Verification Report, to be reviewed and approved by the City with a copy submitted to CARB. The Annual GHG Verification Report would determine whether additional offset credits, or other measures, would be needed for the Proposed Project to result in net zero GHG emissions, and must include a process for verifying the actual number and attendance of net

new, market-shifted, and backfill events based on actual event data rather than projections (see Response to Comment NRDC-9).

NRDC-6

The discussion on page 3.2-12 of the Draft EIR acknowledges that the South Coast Air Basin (Air Basin) is in extreme nonattainment for ozone and that the SCAQMD is actively working to achieve attainment of the attainment of the 8-hour ozone standard by 2024. The Draft EIR also acknowledges that the emissions that would be generated by the Proposed Project would be significant and unavoidable, and, as such, the Proposed Project would be required to implement mitigation measures and project design features (PDFs) to reduce pollutant emissions from the construction and operation of the Proposed Project as compared to similar, unmitigated sources of emissions. Implementation of all of the feasible mitigation measures and project design features that would be necessary to avoid or substantially lessen the significant impacts of the Proposed Project would be monitored through the Mitigation Monitoring and Reporting Program required to be adopted if the Proposed Project is approved.

The 2016 Air Quality Management Plan (AQMP) demonstrates that the South Coast Air Basin can achieve the federal air quality standards by the applicable deadlines even with projected growth through year 2031 (compared to the baseline of 2012) with population growth of 12 percent, growth in employment of 23 percent, and growth in vehicle miles traveled of 8 percent.<sup>6</sup> Thus, contrary to the implication in the comment, a project with net new emissions is not inherently inconsistent with the goals of the AQMP. As detailed below, the Project-specific mitigation measures and PDFs would be consistent with many of the plans and strategies outlined in the 2016 AQMP.

Mitigation Measure 3.2-2(c), implementing PDF 3.2-1, would require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and US EPA Tier 4 Final off-road emissions standards or equivalent, and that equipment such as concrete/ industrial saws, pumps, aerial lifts, material hoists, air compressors, and forklifts must be electric or alternative-fueled (i.e., non-diesel). These strategies are consistent with CARB's efforts to achieve additional reductions from off-road equipment, which are included in the 2016 AQMP (see Draft EIR, page 4-40).<sup>7</sup>

Mitigation Measure 3.2-2(c) also would require operators of heavy-duty haul trucks visiting the Project Site during construction commit to using 2010 model

<sup>6</sup> SCAQMD, Final 2016 Air Quality Management Plan, <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>, Table 3-3 on page 3-18; accessed April 16, 2020.

<sup>7</sup> SCAQMD, Final 2016 Air Quality Management Plan, <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>, Table 3-3 on p. 3-18; accessed April 16, 2020.

year or newer engines that meet CARB's 2010 engine emission standards. Accelerating the retirement of older on-road heavy-duty vehicles is consistent with SCAQMD's Proposed Mobile Source 8-Hour Ozone Measure MOB-08. The mitigation measure also would require the project applicant to "strive to use zero-emission (ZE) or near-zero-emission (NZE) heavy-duty haul trucks during construction," consistent with SCAQMD's Proposed Mobile Source 8-Hour Ozone Measure MOB-07.

The Proposed Project would also result in an increase in short-term employment compared to existing conditions, as indicated on page 3.2-66. Although the Proposed Project would generate construction workers on the Project Site during the construction process, construction-related jobs generated by the Proposed Project would likely be filled by employees within the construction industry within the City of Inglewood and the greater Los Angeles region. Therefore, the construction jobs generated by the Proposed Project would not conflict with the long-term employment or population projections upon which the AQMPs are based.

The 2016 AQMP also includes land use and transportation strategies from the SCAG 2016 RTP/SCS that are intended to reduce VMT and resulting regional mobile source emissions (page 4-42 of the 2016 AQMP). Implementation of Mitigation Measure 3.14-2(b), would require the development of a comprehensive Transportation Demand Management (TDM) Program that would include the following features: encouraging alternative modes of transportation (i.e., rail, bus, etc.), event-day dedicated shuttle services, encourage carpools and ZE vehicles, encourage active transportation (i.e., bicycles), employee vanpools, and park and ride programs. These programs would promote the reduction of VMT within the Project Area, thereby resulting in a decrease in mobile emissions.

Nevertheless, because regional emissions during construction and operation of the Proposed Project would exceed the significance thresholds for those criteria air pollutants for which the Air Basin is not in attainment (i.e., VOC, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>), the EIR states that the Proposed Project would have a significant impact regarding consistency with the AQMP.

With respect to Impact 3.2-2, as discussed in the Draft EIR, the Proposed Project would exceed established thresholds for construction NO<sub>x</sub> emissions and operational emissions of VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> that would represent a considerable contribution to a cumulative impact. Therefore, Mitigation Measures 3.2-6(a) through 3.2-6(d), discussed on page 3.2-104, would be required to reduce the Proposed Project contribution to cumulative impacts related to the construction and operation of the Project. Aside from

these mitigation measures, there are no additional feasible mitigation strategies to further reduce the maximum daily regional emissions during operations.

**Comment [U1]:** Add reference to 3.2-2(e) and elsewhere when feasible mitigation strategies related to maximum daily regional emissions are discussed.

With respect to Impact 3.2-5, as discussed above regarding Impact 3.2-1, the Proposed Project would be consistent with plans and strategies included in the 2016 AQMP. However, because pollutant emissions from the Proposed Project would exceed significance thresholds for those criteria air pollutants for which the Air Basin is not in attainment (i.e., VOC, NO<sub>x</sub>, PM10, and PM2.5), the Proposed Project would have a significant impact regarding consistency with the AQMP.

NRDC-7

The analysis in the Draft EIR included calculations based on the EMFAC2017 emission model, which is the most current model for mobile source emissions approved by both CARB and the US EPA. Therefore, EMFAC2017 is the most appropriate model to use for assessing mobile source emissions for the Proposed Project. The effect of the potential revocation of the US EPA waiver has not been incorporated in the EIR as it is currently subject to litigation and it would be speculative to prejudge the outcome of the legal proceedings.<sup>8</sup> Therefore, the analysis, as completed is correct with the most currently approved standards.

On September 27, 2019, the US EPA and the National Highway Traffic Safety Administration (NHTSA) published the SAFE Rule Part One I (84 Fed. Reg. 51,310). The SAFE Rule Part One I Rule revokes California's authority to set its own GHG emissions standards and set zero emission vehicle mandates in California. On March 31, 2020, the US EPA and NHTSA released the final SAFE regulation, known as the SAFE Rule Part II, and submitted it for publication in the Federal Register. SAFE Rule Part II is expected to be effective 60 days after being published in the Federal Register. The new regulation sets CO<sub>2</sub> emissions standards and CAFE standards for passenger vehicles and light duty trucks, covering model years 2021-2026. Under the final regulation, both CAFE and CO<sub>2</sub> emissions standards will increase in stringency by 1.5 percent per year from 2021 through 2026 over model year 2020 levels, which is less stringent than the five percent annual increases required under the previous federal requirements. Thus, implementation of the SAFE Rule Part II would increase the emission factors of mobile source gasoline fueled vehicles model year 2021 or newer by a small margin.

**Comment [U2]:** Check whether reference to SAFE rules should be One/Two or I/II, make global change to Chapters 2.0 and 3.0.

On November 20, 2019, CARB published EMFAC off-model adjustment factors to account for the SAFE Rule Part I.<sup>9</sup> These adjustment factors increase mobile emission factors up to 0.34 percent depending on the criteria pollutant.

<sup>8</sup> California Air Resources Board. 2019. EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One I, November 20, 2019.

<sup>9</sup> Available: [https://ww3.arb.ca.gov/msei/emfac\\_off\\_model\\_adjustment\\_factors\\_final\\_draft.pdf](https://ww3.arb.ca.gov/msei/emfac_off_model_adjustment_factors_final_draft.pdf).

For example, under the 18,500 attendee concert scenario (the largest attendee event at the proposed Arena), reported in the Draft EIR in Table 3.2-23, CO emissions with the SAFE Rule Part I adjustment factor increase from 916.80 pounds per day (lbs/day) to 919.90 lbs/day, a difference of 0.343 percent. Under the same scenario, application of the CARB adjustment factor results in an increase in NOx emissions ~~increase~~ from 92.83 lbs/day to 92.86 lbs/day, an increase of 0.03 percent. For all pollutants for which CARB issued correction factors, the change to the emissions ~~presented in the Draft EIR~~ are negligible and impacts remain significant and unavoidable.

**Comment [U3]:** Percent change from 916.8 to 919.9 is 0.33813%; seems helpful to round up here and also match the stated up to 0.34 increase in CARB adjustments noted earlier in the paragraph.

Draft EIR, page 3.2-41, the following is added after the first full paragraph:

After preparation of the air quality emissions modeling, on September 27, 2019, the US EPA and the National Highway Traffic Safety Administration (NHTSA) published the Safer Affordable Fuel Efficient (SAFE) Vehicles Rule Part One (84 Fed. Reg. 51,310). The SAFE Rule Part One Rule revokes California's authority to set its own vehicle emissions standards and to set zero emission vehicle mandates in California. In response to US EPA promulgation of the SAFE Rule Part One Rule, CARB published EMFAC off-model adjustment factors to account for changed future standards. Although the Rule is subject to current litigation, in the event that it is ultimately implemented, future analysis years would be subject to less stringent emissions standards. The result of these adjustment factors would be slight increases in all criteria pollutants compared to those presented in the analyses in this Draft EIR.

**Comment [U4]:** The same changes also need to be made to the text in Chapter 2.

As discussed above, currently the SAFE Rule ~~Part One~~ is under litigation and the results of that legal process are unknown. Therefore, as both the revocation of the California Waiver and the results of the SAFE Rule ~~Part One~~ litigation are unknown, the most appropriate modeling for the Proposed Project remains the emissions determined using the CARB and US EPA approved EMFAC2017 model. But even when emissions are calculated using CARB's off-model adjustment factors, the change in the calculated emissions is inconsequential.

NRDC-8

The off-model adjustments to EMFAC that were issued by CARB in November to address ~~the SAFE Rule Part One rule~~ did not include adjustment factors for GHG emissions because revisions to the GHG emissions and fuel efficiency standards were expected in the SAFE Rule Part II ~~rule~~. CARB has not released ~~EMFAC off-model~~ the GHG adjustment factors ~~as part of to reflect~~ the SAFE Rule Part II ~~rule~~. Regardless of CARB's forthcoming guidance and the legal challenges that could delay implementation of the SAFE Rule Part II ~~rule~~, the Proposed Project must meet the "no net new" emissions threshold, in the manner described in Mitigation Measures 3.7-1(a) and 3.7-1(b). As described in

Mitigation Measure 3.7-1(b), “[t]he Annual GHG Verification Report shall estimate the Proposed Project emissions for the previous year based on operational data and methods, and using appropriate emissions factors for that year.” Accordingly, the existing mitigation measure would account for any future regulatory changes and associated emissions quantification.

NRDC-9

As described above in Responses to Comments NRDC-7 and NRDC-8, the analyses of criteria air pollutants and GHGs in the Draft EIR are accurate. The mitigation measures presented in the Draft EIR represent all mitigation measures that would be effective, implementable, and feasible. Nevertheless, the comment suggests a number of additional measures, each of which is discussed below.

The comment suggests that shuttle buses should be zero-emission (ZE) vehicles starting on day one. The project applicant would implement the Proposed Project shuttle and charter bus program by contracting with a third-party commercial operator. Although ZE shuttle buses exist today, deployment among commercial operators of ZE shuttles is limited. Because of the operational requirements for the shuttle program, the current limited supply of ZE shuttles and necessary infrastructure to support operations, and the limited available incentives to support the purchase of ZE shuttles by local commercial operators means that it would be highly speculative to assume that ZE shuttles would be commercially available to be deployed when the required shuttle services to the Proposed Project would be initiated.<sup>10</sup> To support its assessment of the feasibility of deployment of ZE shuttle buses, the City retained an air pollution reduction technology expert, Ray Gorski, to conduct a detailed evaluation of the potential availability of ZE and NZE technology as part of the construction and operation of the Proposed Project. Based on the input from the City’s expert, requiring ZE shuttle buses on day one with the inventory that is commercially deployed would be too speculative to consider feasible at this time.

Draft EIR, page 3.2-89, the following is added after Mitigation Measure 3.2-2(d):

**Mitigation Measure 3.2-2(e)**

*If ZE or NZE shuttle buses sufficient to meet operational requirements of the TDM Program described in Mitigation Measure 3.14-2(b) are determined to be commercially available and financially feasible, the project applicant shall provide bidding priority to encourage their use as part of the TDM Program.*

The comment states that emergency generators should be electrically powered. As indicated on page 3.2-45 of the Draft EIR, the Arena Site would include up

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<sup>10</sup> Ray Gorski, Inglewood Basketball & Entertainment Center Draft EIR: Review of Suggested Mitigation Measures, May 2020.

to two stationary emergency generators with an estimated total capacity rated at approximately 2,400 kilowatts (kW) that would provide building electricity to life safety systems such as elevators and fire pumps in the event of a power outage. Because in an emergency electric power may not be available, the use of electric generators would not be feasible for use in emergency situations.

The comment also states that the Proposed Project should include both more solar panels and storage for solar power. As indicated in Chapter 2, Project Description, page 2-7, a photovoltaic (PV) solar panel system would be installed that would have the capacity to generate more than one million kilowatt (kW) hours per year. The purpose of the PV system would be to generate renewable energy and offset grid energy use. Battery energy storage would be integrated to optimize ~~payback of the PV system by reducing demand for grid power,~~ particularly peak demand, on event days, ~~and by saving time-of-use charges.~~ Emergency backup power would be provided by inverters for the West Parking Garage and East Transportation Hub and Parking Garage. However, considering the size of the uses in the Arena Site, a solar PV system with battery energy storage is not feasible or suitable to meet the minimum run-time and necessary loads for emergency backup power required by the California Electrical Code.

The comment suggests revising Mitigation Measure 3.2-1(d) to mandate that vendor and material delivery trucks be ZE or NZE, and that Mitigation Measure 3.2-3(c)(3) be revised to require ZE or NZE heavy-duty haul trucks during construction. Pursuant to CEQA Guideline 15126.4(a)(1), the Draft EIR must describe “feasible” mitigation measures to reduce significant impacts. CEQA Guidelines section 15364 defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” In order to establish the feasibility of GHG and criteria pollutant reduction measures included in Mitigation Measures 3.2-1 and 3.2-3, the City enlisted the help of a recognized subject matter expert in the field of construction technology assessments to establish the availability and applicability of various NOx-reducing technologies, such as those the project applicant would be required to incentivize under Mitigation Measures 3.2-1(d), and 3.2-3(c)(3). Please see Response to Comment SCAQMD3-14.

The results of the review by the City’s air pollution reduction technology expert indicated that ZE and NZE trucks are available but with limited applicability to construction-related activities. Performance requirements of heavy-duty on-road trucks for the construction activities required for the Proposed Project (i.e., soil import/export) are typically Class 8 trucks with a Gross Vehicle Weight Rating (GVWR) greater than 33,000 pounds, equipped with engines greater than 10 liters. Currently available ZE and NZE trucks available consist of engines with

displacement of 6.8- and 8.9-liters are not powerful enough to provide the main service needed during construction (hauling) and therefore would not represent a meaningful portion of the on-road truck trips analyzed in the draft EIR. Because ZE and NZE equipment costs considerably more than similar diesel-powered equipment, most purchasers rely on one of several incentive programs offered by the California Air Resources Board (CARB), California Energy Commission (CEC), or programs administered by the SCAQMD to offset the cost. Based on a search of all major California programs that offer incentives for this type of engine, none were used for construction-related activities such as haul trucks. Because of the uncertainty of the availability of on-road trucks appropriate for construction duty in the market in the timeframe anticipated for project construction, an unequivocal requirement to use ZE or NZE technology that is not yet commercially available would be too speculative to be considered feasible at this time.

Mitigation Measure 3.2-2(d) requires the project applicant to incentivize the use of ZE or NZE heavy-duty trucks for vendors and material deliveries during operation of the Proposed Project. Requiring NZE trucks during operations, as requested by the SCAQMD, would be infeasible as trucks visiting the Project Site would primarily be from third party vendors or tenants, which may be selected based on specific, possibly competing, criteria than their access to ZE or NZE delivery trucks. For example, in order to ensure that the City achieves its goal of additional employment opportunities for Inglewood residents and businesses, the proposed Development Agreement requires the developer, as the owner of the Arena, to take various actions to help the City achieve its goal of hiring qualified Inglewood residents for no less than 35% of the employment positions needed in connection with event operations at the Arena; these employment positions include the Developer's contractors, subcontractors, and vendors providing services in connection with events held inside the Arena, such as food and beverage service, hospitality, and event security ("Event Operations Providers").

Local small businesses may not have the ability to secure ZE heavy-duty trucks to which larger vendors may have access. According to the City's air pollution reduction technology expert, as of today there is limited availability of NZE and ZE vehicles in commercial businesses, and specifically in businesses that support the commercial activities that would likely be needed at an event center like the Proposed Project. Additionally, it is not currently knowable which vendors or tenants would be present during initial operations, and they may change over time. For these reasons, it is speculative to assume that it would be feasible to require vendors and suppliers to provide deliveries and services exclusively, or even meaningfully, using NZE and ZE vehicles. As



such. Mitigation Measure 3.2-2(d) includes all feasible mitigation. Please also see Response to Comment SCAQMD3-14.

**Comment [U5]:** APPLICANT TEAM: Revised to reflect consistency with SCAQMD3-14.

With respect to electric vehicle parking and electric vehicle charging stations (EVCS) recommended in the comment, these items are included in the Proposed Project (see Draft EIR, page 2-64). Additionally, as stated in Draft EIR, Chapter 2, Project Description (Draft EIR, pages 2-43 through 2-45) and in Draft EIR, Section 3.7, Greenhouse Gas Emissions (Draft EIR, page 3.7-44) a total of 330 EVCS would be installed in the Proposed Project parking garages to support and encourage the future use of electric and hybrid-electric vehicles by employees, visitors, event attendees, and the public. The number of proposed EVCS would be equal to 8 percent of total parking spaces and is greater than the minimum requirement ~~that of~~ 6 percent of parking spaces be EV capable, which does not include the actual installation of EVCS, established by CCR 24, California's Building Energy Efficiency Standards; Part 11 (CALGreen Code). The Proposed Project would comply, as required, with applicable building code requirements at the time of construction.

With respect to the suggestion that each building include solar PV panels, the Proposed Project would include a robust solar ~~energy generation~~ and battery ~~storage~~ system, as described above. The Proposed Project would install PV panels on ~~the structures within the Arena Site, the South Parking Garage, and the West Parking Garage Site.~~ Because solar power generated on private property cannot be transferred across a public right of way, such as streets, PV panels were not anticipated on the East Parking Structure since the energy demand from the parking structure and transportation hub is low. The hotel transaction and design have not progressed to the point where feasibility and efficacy of PV panels on the hotel structure or elsewhere on the hotel site can be determined. A requirement for the inclusion of PV panels would be stipulated in the final development agreement, if determined appropriate and feasible, when the hotel design is finalized.

As stated in Draft EIR, Section 3.2, Air Quality (Draft EIR, page 3.2-72), the Transportation Demand Management (TDM) Program would include a variety of components, including programs to encourage alternative modes of transportation (rail, public bus, and vanpool), including event-day dedicated shuttle services; programs to increase the use of carpools and ZE vehicles, active transportation, employee vanpools, a park-n-ride program, and information services; and programs to reduce on-site parking demand, including event-day local microtransit service. The TDM Program would be designed to reduce vehicle trips through a variety of TDM components that would have the correlative effect to reduce greenhouse gas emissions, criteria pollutant, and

TAC emissions from transportation, and would therefore reduce air pollutant and GHG emissions from Project-related transportation.

As required by AB 987, the TDM Program would result in a reduction of vehicle trips, which would result in reduced vehicular emissions of GHGs and related criteria pollutants. The magnitude of potential emissions reductions would be based on reduced vehicles miles traveled (VMT) which accounts for changes in mode (vehicle trip types including private attendee vehicles, transportation network company vehicles, employees, shuttles, and miscellaneous vehicles), ridership (occupancy per vehicle), and trip lengths for events, employees, and patrons of the Proposed Project compared to those same travel characteristics in the absence of the TDM Program required under Mitigation Measure 3.7-1(b). The implementation of this mitigation measure would reduce vehicle trips, especially single-occupancy vehicle trips, and encourage the use of non-automotive modes of transportation, thereby reducing Project-related vehicular emissions during operation of the Proposed Project. The efficacy of the TDM program in reducing GHG and related criteria pollutant emissions reductions would be estimated and independently verified as part of the GHG Annual Verification Report required by Mitigation Measure 3.7-1(b).

The Draft EIR does not improperly defer mitigation. Mitigation Measures 3.7-1(a) and 3.7-1(b) require the project applicant to implement, estimate the efficacy of, and independently verify a GHG Reduction Plan that includes required and any additional GHG reduction measures needed to meet a specified performance standard, namely to reduce the Proposed Project incremental GHG emissions to no net new GHG emissions, or better. Mitigation Measure 3.7-1(a) identifies a list of required measures to be included in the GHG Reduction Plan, including energy reduction to meet LEED Gold certification, a multi-pronged TDM Program with 9 fully articulated TDM strategies and a monitoring program. The measure also identifies specific potential additional on- and off-site measures that may be needed to achieve no net new GHG emissions. Achievement of no net new GHG emissions is a measurable performance standard that would be monitored and verified by an independent qualified expert on an annual basis, as described in Mitigation Measure 3.7-1(b).

Mitigation Measures 3.7-1(b) in the Draft EIR establishes that the GHG Reduction Plan would be monitored and independently verified annually, with reporting provided to the City and a copy to CARB, and refined, as necessary, in order to meet the performance standard in the coming year. Any such revisions would be subject to review and approval by the City. The measure states that “[f]ollowing completion and verification of the Annual GHG Verification Report, the GHG Reduction Plan shall be refined as may be needed in order to

maintain emissions below net zero over the next reporting year. Any such revisions shall be prepared by the qualified expert retained by the project applicant and shall be subject to review and approval by the City.” The City’s review and approval of refinements to the GHG Reduction Plan would not be a discretionary project under CEQA because the role of the City would be “to determine whether there has been conformity with applicable statutes, ordinances, or regulations, or other fixed standards...”, and not the exercise of judgment or deliberation to approve or disapprove a particular activity, in accordance with CEQA Guidelines section 15378.

The use of carbon offset credits for mitigation of GHG emissions is appropriate under CEQA. CEQA Guidelines section 15126.4(c)(2)(3) specifically provides that measures to mitigate greenhouse gases may include ~~states that~~ “[o]ff-site measures, including offsets that are not otherwise required, to mitigate a project's emissions.”

California’s Cap and Trade Program is overseen by CARB, which has adopted five Compliance Offset Protocols to date that qualify for use in the State of California’s Cap and Trade program, and has approved three Offset Project Registries (American Carbon Registry, Climate Action Reserve, and Verra [formerly the Verified Carbon Standard]), to help administer the Compliance Offset Program. These registries were selected because of their commitment to ensuring that the offsets they contain are permanent, additional, quantifiable, and enforceable. There is no requirement under CEQA that GHG offsets used for mitigation meet CARB standards for Cap and Trade compliance offsets. Nevertheless, Mitigation Measure 3.7-1(a)(2)(B)(b)(i) specifies the use of a CARB-approved offset project registry in order to ensure that any offsets used for mitigation of the Proposed Project GHG emissions would be of the highest quality – i.e., real, additional, permanent, and third-party verified.

Finally, the comment provides a list of local, direct measures, stating that they should be required before offsets are used. Although Mitigation Measure 3.7-1(a) includes a list of required GHG reduction measures, and a list of potential additional on-site measures for reducing emissions, it explicitly states that substitute GHG reduction measures may be implemented provided that ~~they are~~ they are equally effective or superior to those proposed, as new technology and/or other feasible measures become available during construction or the 30-year operational life of the Proposed Project. While AB 987 requires the use of local, direct measures to mitigate at least 50 percent of the reductions needed to achieve “no net new” project emissions, because the environmental effects of GHG emissions are purely cumulative in nature and involve global climate change that cannot be tied to emissions in any one location or mitigated exclusively at a local level, under CEQA no such requirement exists for

compliance with the Draft EIR requirements for mitigation. If the Proposed Project is approved by the City, the local direct emissions reductions measures identified in the AB 987 certification would be adopted by the City as additional conditions of approval for the Proposed Project.

NRDC-10

This comment is addressed in Response to Comment NRDC-4, which identifies the substantial effort undertaken by the City to examine whether implementation of the Proposed Project would result in direct or indirect housing displacement effects leading to the construction of new housing. To support its evaluation of potential indirect displacement, the City undertook a detailed study, conducted by ALH Urban & Regional Economics (included in the Draft EIR as Appendix S), to consider and disclose anticipated impacts related to indirect displacement. As is concluded on page 3.12-22 of the Draft EIR, no evidence in the record supports a conclusion that a new sports venue would indirectly contribute to such effects that would result in displacement of existing housing units or residents in such substantial numbers that the construction of new housing elsewhere would be necessitated.

The City conducted a thorough study of potential direct and indirect housing displacement and has drawn a conclusion based on that study; please see Response to Comment NRDC-4 and Draft EIR, Appendix S for further information. The comment does not provide any evidence of potential displacement of current residents that would contravene the evidence and analysis presented in the Draft EIR. Additionally, there is no evidence in the record that supports a conclusion that a new sports venue would indirectly contribute to displacement of existing housing units or residents.

NRDC-11

The Draft EIR described human health impacts of the Proposed Project qualitatively and quantitatively in Draft EIR, Section 3.1, Aesthetics; Section 3.2, Air Quality; Section 3.8, Hazards and Hazardous Materials; and Section 3.11, Noise. Each of these are discussed below.

Although the comment asserts that human health impacts of displacement “are real,” the analysis presented in the Draft EIR, including an expert study undertaken by ALH Urban & Regional Economics, concludes that there is no evidence directly connecting the Proposed Project to substantial housing displacement that would result in the need for construction of new housing. No evidence in the record supports a conclusion that a new sports venue would indirectly contribute to such effects that would result in displacement of existing housing units or residents in such substantial numbers that the construction of new housing elsewhere would be necessitated. Because the Proposed Project would not be associated with substantial displacement, the EIR is not required to discuss the relationship of displacement to human health. Please see Response

to Comment NRDC-4 for a further discussion of the City's analysis concluding the Proposed Project would not result in indirect housing displacement.

### **Aesthetics**

In Draft EIR, Section 4.1, Aesthetics, the issue of health effects of light that could be produced by light-emitting diodes (LEDs) that could be part of the Proposed Project lighting and signage plan is addressed (see Draft EIR, pages 3.1-47 through 3.1-49). The discussion summarizes the current state of the debate regarding the potential health effects of high intensity LED lighting, recognizing both the concerns raised in a June 2016 American Medical Association (AMA) report, and contrary opinions from the Illuminating Engineering Society (IES) and the International Dark Sky Association.

The discussion concludes that the health effects of the use of LED lights remain subject to disagreement as of the publication of the Draft EIR, and that "there is no scientific consensus regarding the health effects of exposure to LED lights. As a result of the lack of scientific consensus on the issue of health effects of exposure to LED lights, further analysis would be speculative."

As noted in the Draft EIR, speculative information is not appropriate for inclusion in an EIR. CEQA Guidelines section 15145 states that "[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact."

### **Air Quality**

Draft EIR, Section 3.2, Air Quality, first describes health impacts qualitatively by identifying criteria air pollutants such as ozone, volatile organic compounds (VOCs), nitrogen dioxide (NO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and lead (Pb). The notable health problems and consequential damage to the environment from these pollutants are described on pages 3.2-3 through 3.2-12. The health impacts of toxic air contaminants (TACs), which are known or suspected to cause serious health problems are also described in the Draft EIR (page 3.2-9 through 3.2-11). TACs include diesel exhaust, gasoline exhaust, and visibility reducing particles.

Several quantitative analyses were completed to adequately evaluate and present the human health impacts of the Proposed Project. These quantitative analyses include a Health Impact Assessment (HIA), localized impact assessment, carbon monoxide (CO) hotspot analysis, and a refined Health Risk Assessment (HRA).

### Health Impact Assessment

An HIA of the Proposed Project's estimated criteria air pollutant emissions was prepared and is described in detail starting on page 3.2-81 of the Draft EIR. The nature of concentrations and the distribution of such regional pollutants as ozone and particulate matter, and the types of long-term exposures that result in health consequences, is very complex and isolating the contribution of any one source of pollution, particularly mobile source pollutants, is not the intent of the currently available models. The HIA uses the best available models: the US EPA's model, Community Multiscale Air Quality (CMAQ), and the US EPA's Environmental Benefits Mapping and Analysis Program – Community Edition (BenMAP-CE) model, and uses a set of conservative assumptions to provide information on possible health effects that could result from the Proposed Project criteria air pollutant emissions.

The quantitative HIA did not result in statistically significant results. As presented in Draft EIR, Appendix D, the modeled health effects of the Proposed Project would be a fraction of a percent compared to the corresponding baseline values for a variety of health effect outcomes, would be well within the range of uncertainty for the models, and, thus, could potentially be zero. Therefore, despite detailed, conservative, and complex photochemical grid modeling, developed in consultation with and reviewed by the South Coast Air Quality Management District, no meaningful conclusion could be drawn with respect to potential health effects from the criteria pollutant emissions of the Proposed Project.

### Localized Impact Assessment

The potential localized impacts from short-term construction activities and long-term operation of the Proposed Project are analyzed in the Draft EIR using an air dispersion model (AERMOD) to generate concentrations of nitrogen dioxide (NO<sub>2</sub>), CO, and small particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) at air quality sensitive receptor locations surrounding the Project Site (see Draft EIR, pages 3.2-91 to 3.2-94). The localized impacts of both construction emissions and operational emissions would be below applicable local and federal thresholds.

As indicated on page 3.2-94, a CO hotspot analysis was completed for the Proposed Project because elevated concentrations of this pollutant tend to accumulate near areas of heavy traffic congestion and where average vehicle speeds are low. A detailed review of the traffic data identified the four intersections in the vicinity of the Project Site that demonstrated the most degraded Level of Service (LOS) and highest vehicle volumes associated with the Proposed Project. Logically, if these vehicular emissions at these four intersections would result in CO concentrations less than the established

thresholds, all other affected intersections would also be below the thresholds. As shown in Table 3.2-30, the CO concentrations at all four evaluated intersections would be below the applicable CAAQS, resulting in a less-than-significant impact.

#### Health Risk Assessment

An HRA was prepared to evaluate the risk of potential negative health outcomes (cancer, or other acute or chronic conditions) related to long-term cumulative TAC exposure from airborne emissions during construction and operation of the Proposed Project (pages 3.2-97 to 3.2-102). For construction, the potential emission sources of mobile source air toxics (MSATs) and diesel particulate matter (DPM) would be diesel-fueled heavy-duty equipment, on-road travel and idling emissions from diesel-fueled haul trucks, and on-road travel emissions from gasoline-fueled worker vehicles. For operation, the potential emission sources would be gasoline-fueled passenger vehicles travelling to and from the Project Site, diesel-fueled delivery trucks, diesel-fueled delivery trucks with transport refrigeration units (TRUs), and diesel-fueled emergency generators and emergency fire pumps.

A dense receptor grid around the Project Site and surrounding roadways that would carry Proposed Project traffic was used to disclose the maximum health risk impacts to exposed air quality sensitive receptors. As shown in Table 3.2-31 in Draft EIR, Section 3.2, Air Quality, construction and operation of the Proposed Project would not result exceedances of the SCAQMD cancer risk significance threshold of an incremental increase of 10 in a million.

#### **Hazards and Hazardous Materials**

The focus of Draft EIR, Section 3.8, Hazards and Hazardous Materials, is the potential creation of health and safety-related hazards through the routine transport, use, or disposal of hazardous materials, or reasonably foreseeable upset and accident conditions involving the release of hazardous materials during construction or operation of the Proposed Project. Discussion on pages 3.8-3 to 3.8-5 of the Draft EIR provides an overview of the types of hazards and human health effects that could occur related to the conditions that exist on the Project Site, including the potential health effects associated with disturbance of hazardous materials that may be present in the site soils, underlying groundwater, or in existing structures on the site during demolition and/or construction of the Proposed Project.

The impact analysis (see Impacts 3.8-1 and 3.8-2) explains the status of known hazards that exist on the site (see Draft EIR, pages 3.8-30 to 31). The removal of older structures on the site has the potential to result in exposures to asbestos

containing materials and other hazardous building materials that could result in adverse health effects “if not managed appropriately as required by existing laws and regulations” (see Draft EIR, pages 3.8-32 to 33). The analysis discusses the potential for improper handling and transport of hazardous materials to result in adverse health effects to workers and the public. Because these hazards would be managed in compliance with federal, State, and local regulations regarding the management of hazardous materials, the analysis concluded that the health-related impacts of these hazards would be less than significant.

The air quality analysis is based on the existing conditions of the soils at the Project Site. As stated on page 3.8-40 of the Draft EIR, “there are no known properties within the Project Site that are under active investigation or remediation.” However, as also stated on page 3.8-40, it was acknowledged that “the possibility exists for future improvements associated with the Proposed Project to disturb previously unidentified contamination.” The analysis concluded that “[b]ased on the land use history and results of soil sampling on the Arena Site, during demolition and excavation phases of construction workers could be exposed to diesel--range TPH, chrome, and lead which can have adverse health effects depending on exposure levels and length of exposure.”

While the analysis of the soil samples that were collected across the Project Site included detections of some contaminants, the levels for all the soil samples were below the screening levels for commercial/industrial land uses, with only one exception. On the West Parking Garage Site, because prior analysis has detected levels of contaminants, including possibly hexavalent chromium, thallium, and lead, that are above residential screening levels but below commercial/industrial screening levels, “[e]xposure of people or the environment to contaminated soils or groundwater could occur during construction of the Proposed West Parking Garage.”

A single soil sample on the East Transportation and Hotel Site detected total petroleum hydrocarbons, such as diesel, above the commercial/industrial screening level. However, as stated on page 3.8-42, “this detection is not necessarily an indication of any substantive presence of legacy contaminants,” and as a result, there is no indication from the concentrations of pollutants in onsite soil samples collected that any onsite or offsite remediation would be necessary.

On the Well Relocation Site, the potential for legacy contaminants to be present could result in the exposure of people or the environment to contaminated soils or groundwater during construction of the proposed replacement well.



Each of these impacts was identified to be potentially significant, and mitigated to a less-than-significant level through the implementation of Mitigation Measure 3.8-4, which requires compliance with regulatory standards that are protective of the environment and human health.

### **Noise**

The analysis of noise impacts of the Proposed Project included a thorough discussion of the known relationship between environmental noise and human health, including information from the federal Occupational Safety and Health Administration (OSHA), the World Health Organization (WHO), and other sources (see Draft EIR, pages 3.11-8 to 9). In addition to contributing to hearing impairment, excessive noise has been noted to result in sleep disturbance, which in turn has potential physiological and mental health consequences. The analysis also describes the health effects of vibration, especially to construction workers using vibrating power tools (see Draft EIR, page 3.11-10).

Discussion on pages 3.11-64 to 65 of the Draft EIR describes the potential health consequences of excessive construction noise levels, and discussion on page 3.11-70 describes potential health effects of the type of long-term operational noise that can be generated by traffic noise impacts.

A discussion under Impact 3.11-1 (Draft EIR, page 3.11-101) describes the potential health effects of significant construction noise impacts of the Proposed Project, and Figure 3.11-7 on page 3.11-102 of the Draft EIR identifies areas around the Project Site that could be subject to potential sleep disturbance as a result of worst-case nighttime construction. The analysis of health effects concludes that “[d]ue to the high variability of each individual’s sensitivity to nighttime noise, uncertain factors related to nighttime construction activity such as number of peak noise level occurrences, and lack of an established or adopted threshold designating acceptable occurrences of awakenings, the estimated area for awakenings presented in this analysis represents the City’s best effort to disclose the potential sleep disturbance effects of nighttime construction, but do not represent predictions of sleep awakenings for any specific location or population.” It then goes on to conclude that “[w]hile exposure to high levels of noise during sleep can result in physiological responses, it is not possible to predict such effects in any particular population.”

In addition to construction noise health effects, the Draft EIR also considered the potential health effects of roadside noise impacts (see Draft EIR, page 3.11-137). The analysis explains that post-event traffic noise after evening Major Events “could generate significant noise levels late into the evening hours up to 15-25 times a year, [and] could disturb sleep during nighttime hours.” However, given the time of the evening (9:30-10:30 PM) and relatively short duration of

post-event traffic, “significant traffic noise increases of the Proposed Project would not be expected to result in adverse health impacts.”

Finally, the analysis of on-site operational noise discusses the potential health effects of identified significant impacts (see Draft EIR, pages 3.11-157 to 158). It explains that operational noise levels would not reach the point at which pain or hearing damage would occur, but does acknowledge that it is possible that noise levels late into the evening “could disturb sleep during nighttime hours.”

### **Conclusion**

As described above, the Draft EIR included a broad and thorough discussion of the potential health consequences of a range of significant impacts. It met the requirements of CEQA that are articulated in the CEQA Guidelines and were most recently interpreted by the California Supreme Court in the case of *Sierra Club v. County of Fresno* 6 Cal.5th 502.

NRDC-12

The Final EIR provides responses to all written comments on the Draft EIR. In responding to those comments, the City has at points provided additional clarification or expanded upon information and analyses provided in the Draft EIR. In several locations, minor edits have been made to the language of the Draft EIR in order to correct inadvertent errors, to provide clarification, or reflect information provided in comments. However, neither the content of the responses to comments, nor the editorial changes made to the language of the Draft EIR constitute “significant new information” as defined in CEQA Guideline section 15088.5(a). Therefore, there is no requirement for recirculation of the Draft EIR.

Letter Garcia (1 of 1)

**Letter**        **Richard Garcia**  
**Garcia**       **December 30, 2019**  
**Response**

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Garcia-1        The comment refers to the Los Angeles Aerial Rapid Transit project, also known as the Dodger Stadium Gondola project. This project is currently undergoing an environmental review, led by Metro. No analysis of the project has been released. The project would connect Union Station in downtown Los Angeles to Dodger Stadium, providing a transit option for stadium attendees, and could conceivably serve as a tourist attraction on non-event days. The proposal is estimated to be 1.25 miles in length. Station locations have not been determined. The cost of the project is preliminarily estimated to be \$125 million. The project is privately financed.<sup>11</sup>

The City believes that incorporation of a mitigation measure to construct a gondola from the Hawthorne/Lennox Station, on the Metro Green Line, to the Proposed Project as a way to reduce traffic on event days is neither feasible nor practical. Neither the City of Inglewood nor private developers such as the developers of the NFL Stadium or the Proposed Project have proposed to construct a gondola in Inglewood. The Green Line Station is approximately 0.9 miles from the Project Site, as the crow flies. Along this path, the route would be over many private properties, including several residential neighborhoods, businesses, and an elementary school. If the route would follow along public rights-of-way, the route would be longer, approximately 1.3 miles from the Hawthorne/Lennox Station to the Proposed Project. Under any route considered, right-of-way would need to be acquired to accommodate the structural support towers needed for the gondola, and air rights would need to be acquired to the extent necessary. The cost of such a system has not been estimated, but it would likely exceed the \$125 million preliminary estimate for the LA ART project due to the need to acquire right-of-way.

As discussed and analyzed in the Draft EIR, during major events, the Proposed Project would operate shuttles that transport attendees between the site and the Hawthorne Green Line Station and planned Metro Crenshaw/LAX Line station in Downtown Inglewood (see Draft EIR, page 3.14-96). Mitigation Measure 3.14 2(b) on pages 3.14-195 through 3.14-199 of the Draft EIR further describe the TDM Program for the Proposed Project to ensure transit connectivity to the Project Site and reduce roadway congestion.

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<sup>11</sup> Metro, 2019. Board Report, Executive Management Committee, Informational Report, Los Angeles Aerial Rapid Transit Project Update. April 18. Additional information is available at the LA ART sponsor's web site at <https://www.aerialrapidtransit.la/>.

Further, as the project applicant does not control property in the HPSP area, where the NFL Stadium is located, construction of facilities in the HPSP area would not be practical. Therefore, the City rejects the suggestion of a gondola from the Hawthorne/Lennox Station, or any other Metro Green Line stations, to the Project Site as infeasible and impractical.

Garcia-2 The City agrees that public transit options should be made available to Arena patrons. The Proposed Project includes several features to encourage the use of transit by Proposed Project patrons and employees. Mitigation Measure 3.14-2(b) requires the project applicant to develop a TDM Program which would include strategies, incentives, and tools to provide opportunities for non-event employees and patrons as well as event attendees and employees to reduce single-occupancy vehicle trips and to use other modes of transportation besides automobile to travel to basketball games and other events hosted at the Proposed Project. Such strategies would include incentivizing alternative modes of transportation (rail, public bus, and vanpool), providing dedicated event-day shuttle services, encouraging carpools and zero emission vehicles, encouraging active transportation such as bicycling and walking, providing an employee vanpool program, providing a regional park-n-ride program, providing information to the public about transportation options, reducing on-site parking demand, and providing event-day local microtransit service. Mitigation Measure 3.14-2(a) requires the project sponsor to implement a Transportation Management Plan during events at the Proposed Project; this plan includes shuttle service to and from Metro stations to further encourage transit use. Depending on demand, additional shuttles may be provided. Details are provided in Draft EIR, Appendix K.4, which provides a draft of the Event TMP. These measures would reduce local traffic volumes and provide connectivity options to train stations and bus transfer stations.

It is possible that in the future Metro could extend bus and train service beyond its existing hours of operation to further accommodate Proposed Project event attendees. The Event TMP and TDM Program include monitoring components so that if demand exists, additional transit service can be provided.

Garcia-3 This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

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Letter Ginyard1 (page 1 of 1)

**Letter**      **Halimah Ginyard**  
**Ginyard1**    February 1, 2020  
**Response**

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Ginyard1-1      This comment expresses support for the Proposed Project, and provides a general description of the Draft EIR's analysis of impacts to and mitigation measures addressing neighborhoods around the Project Site. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter Boles1 (1 of 1)

**Letter**      **Angela Boles**  
**Boles1**      February 2, 2020  
**Response**

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Boles1-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Carr1 (1 of 1)

**Letter**        **Holli Carr**  
**Carr1**        February 2, 2020  
**Response**

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Carr1-1        This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Edwards1 (1 of 1)

**Letter**      **Edward Edwards**  
**Edwards1**    February 2, 2020  
**Response**

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Edwards1-1      This comment expresses support for the Proposed Project and recalls when sports teams and activities were present in Inglewood. The comment also refers to community benefits that the project applicant is dedicated to providing to the local community. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Ginyard2 (1 of 1)

**Letter**      **Halimah Ginyard**  
**Ginyard2**    February 2, 2020  
**Response**

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Ginyard2-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter Holmes1 (1 of 1)

**Letter**      **Louise Holmes**  
**Holmes1**    **February 2, 2020**  
**Response**

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Holmes1-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Jennings-Maul (1 of 1)

**Letter**            **Deborah Jennings-Mau**  
**Jennings-**       **February 2, 2020**  
**Mau1**  
**Response**

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Jennings-Mau1-1 This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Preshal (1 of 1)

**Letter**      **Heather Presha**  
**Presha 1**    **February 2, 2020**  
**Response**

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Presha1-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Roberts (1 of 1)

**Letter**      **Aaron Roberts**  
**Roberts**     February 2, 2020  
**Response**

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Roberts-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter Williams1 (1 of 1)

**Letter**      **Sam Williams**  
**Williams1**    February 2, 2020  
**Response**

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Williams1-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Allen (1 of 1)

**Letter**      **James Allen**  
**Allen**        February 3, 2020  
**Response**

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Allen-1        This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Boles2 (1 of 1)

**Letter**      **Angela Boles**  
**Boles2**      February 3, 2020  
**Response**

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Boles2-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Campbell (1 of 1)

**Letter**      **Billy C. Campbell**  
**Campbell**    February 3, 2020  
**Response**

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Campbell-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter Chenier (page 1 of 1)

**Letter**      **Duana Chenier**  
**Chenier**      **February 3, 2020**  
**Response**

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Chenier-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Cole (page 1 of 1)

**Letter**      **Dorothy Cole**  
**Cole**        **February 3, 2020**  
**Response**

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Cole-1            This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Cuban Leaf (page 1 of 1)

**Letter**      **Cuban Leaf Cigar Lounge**  
**Cuban**      February 3, 2020  
**Leaf**  
**Response**

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Cuban Leaf-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Elzie (page 1 of 1)

**Letter**      **Aaron Elzie**  
**Elzie**        **February 3, 2020**  
**Response**

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Elzie-1            This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Robert Gaskill**  
**Gaskill**      February 3, 2020  
**Response**

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Gaskill-1      This comment expresses support for the Proposed Project, and specifically supports the energy-efficiency and sustainability of the Proposed Project. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Yonnie Hagos**  
**Hagos**      **February 3, 2020**  
**Response**

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Hagos-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Erin James**  
**James**      **February 3, 2020**  
**Response**

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James-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter        Deborah Jennings-Mau**  
**Jennings-    February 3, 2020**  
**Mau2**  
**Response**

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Jennings-Mau2-1 This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter Kay Marina Kay**  
**Response February 3, 2020**

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Kay-1            This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Dolly Morrison**  
**Morrison**    **February 3, 2020**  
**Response**

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Morrison-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Jacquelyn M. Phillips**  
**Phillips**      February 3, 2020  
**Response**

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Phillips-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Sheri Pilts**  
**Pilts**        **February 3, 2020**  
**Response**

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Pilts-1

This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Cheree Psalms**  
**Psalms**      February 3, 2020  
**Response**

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Psalms-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Odest T. Riley Jr.**  
**Riley**        **February 3, 2020**  
**Response**

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Riley-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Linda Smith**  
**L. Smith**    February 3, 2020  
**Response**

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L. Smith-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Brenda Sparks**  
**Sparks**      February 3, 2020  
**Response**

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Sparks-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Alfred Torregano**  
**Torregano**   **February 3, 2020**  
**Response**

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Torregano-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Chibuzo Walton**  
**Walton1**     **February 3, 2020**  
**Response**

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Walton1-1      This comment expresses support for the Proposed Project and recognizes potential environmental and economic impacts of the Proposed Project. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Ana Lopez Albero**  
**Albero**      **February 4, 2020**  
**Response**

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Albero-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Danielle Baines**  
**D. Baines1**   February 4, 2020  
**Response**

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D. Baines1-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Eric Baines**  
**E. Baines1**   February 4, 2020  
**Response**

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E. Baines1-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Thomas Bunn**  
**Bunn**        **February 4, 2020**  
**Response**

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Bunn-1            This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Desiree Deshay**  
**Deshay**      **February 4, 2020**  
**Response**

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Deshay-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Dionne Faulk**  
**Faulk**      February 4, 2020  
**Response**

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Faulk-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Halimah Ginyard**  
**Ginyard3**    February 4, 2020  
**Response**

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Ginyard3-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **LaTaunya Green**  
**Green1**      **February 4, 2020**  
**Response**

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Green1-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Dexter Hall**  
**Hall1**        **February 4, 2020**  
**Response**

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Hall1-1      This comment expresses support for the Proposed Project and refers to community benefits that the project applicant is dedicated to providing to the local community. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Darlene J. Draper Martin**  
**Martin1**     February 4, 2020  
**Response**

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Martin1-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Darwin Scott**  
**Scott1**      February 4, 2020  
**Response**

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Scott1-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Chibuzo Walton**  
**Walton2**     **February 4, 2020**  
**Response**

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Walton2-1      This comment expresses support for the Proposed Project, posing a tradeoff between increased traffic levels and anticipated job creation and potential improved economic conditions. The comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Roshelle Bailey**  
**Bailey**      February 5, 2020  
**Response**

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Bailey-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Danielle Baines**  
**D. Baines2**   February 5, 2020  
**Response**

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D. Baines2-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter      Eric Baines**  
**E. Baines2   February 5, 2020**  
**Response**

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E. Baines2-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Holli Carr**  
**Carr2**      February 5, 2020  
**Response**

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Carr2-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Starla Cameron**  
**Cameron**    **February 5, 2020**  
**Response**

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Cameron-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Illya Dailey**  
**Dailey**      **February 5, 2020**  
**Response**

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Dailey-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Edward Edwards**  
**Edwards2**   **February 5, 2020**  
**Response**

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Edwards2-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Bryce Flueller**  
**Flueller**     February 5, 2020  
**Response**

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Flueller-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **LaTaunya Green**  
**Green2**      **February 5, 2020**  
**Response**

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Green2-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **Michelle Hicks**  
**Hicks**            **February 5, 2020**  
**Response**

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Hicks-1            This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Louise Holmes**  
**Holmes2**    February 5, 2020  
**Response**

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Holmes2-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Cynthia Jackson**  
**C. Jackson**   February 5, 2020  
**Response**

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- C. Jackson-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter Haskel Jackson**  
**H. Jackson February 5, 2020**  
**Response**

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H. Jackson-1 This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Johnnie Jameson**  
**J. Jameson**   February 5, 2020  
**Response**

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- J. Jameson-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Sheryl Jameson**  
**S. Jameson**   February 5, 2020  
**Response**

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- S. Jameson-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter        Deborah Jennings-Mau**  
**Jennings-    February 5, 2020**  
**Mau3**  
**Response**

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Jennings-Mau3-1 This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Cheryl McClellen**  
**McClellen**    February 5, 2020  
**Response**

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McClellen-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**        **Sylvester Mitchell**  
**Mitchell**      February 5, 2020  
**Response**

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Mitchell-1        This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Heather Presha**  
**Presha2**     February 5, 2020  
**Response**

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Presha2-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Aisha Spikes**  
**Spikes**      February 5, 2020  
**Response**

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Spikes-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Theo Thomas**  
**T. Thomas**   February 5, 2020  
**Response**

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- T. Thomas-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Lisa Wright**  
**Wright**      **February 5, 2020**  
**Response**

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Wright-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter      Eric Baines**  
**E. Baines3   February 9, 2020**  
**Response**

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- E. Baines3-1      This comment expresses support for the Proposed Project and notes that the Project Site has been mostly vacant for an extended period of time. The comment recognizes potential economic impacts of the Proposed Project. The comment also references the Proposed Project's energy efficiency and mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Angela Boles**  
**Boles3**      **February 9, 2020**  
**Response**

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Boles3-1      This comment expresses support for the Proposed Project and notes that the Project Site has been mostly vacant for an extended period of time. The comment recognizes potential economic impacts of the Proposed Project. The comment also references the Proposed Project's energy efficiency and mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **James T. Butts**  
**Butts1**            February 9, 2020  
**Response**

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Butts1-1            This comment expresses support for the Proposed Project, and in particular comments on the thoroughness and transparency of the Draft EIR analyses, and its attention to mitigation of neighborhood issues during construction and operation. Please also see Response to Comment Butts2-1.

Letter (page 1 of 1)

**Letter**      **Holli Carr**  
**Carr3**      **February 9, 2020**  
**Response**

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Carr3-1      This comment expresses support for the Proposed Project and notes that the Project Site has been mostly vacant for an extended period of time. The comment recognizes potential economic impacts of the Proposed Project. The comment also references the Proposed Project's energy efficiency and mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Holli Carr**  
**Carr4**      **February 9, 2020**  
**Response**

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Carr4-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Dexter Hall**  
**Hall2**      **February 9, 2020**  
**Response**

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Hall2-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Tiffany Hinton**  
**Hinton**      **February 9, 2020**  
**Response**

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Hinton-1      This comment expresses support for the Proposed Project and notes that the Project Site has been mostly vacant for an extended period of time. The comment recognizes potential economic impacts of the Proposed Project. The comment also references the Proposed Project's energy efficiency and mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Erick Holly**  
**Holly**        **February 9, 2020**  
**Response**

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Holly-1            This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Louise Holmes**  
**Holmes3**     **February 9, 2020**  
**Response**

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Holmes3-1      This comment expresses support for the Proposed Project and notes that the Project Site has been mostly vacant for an extended period of time. The comment recognizes potential economic impacts of the Proposed Project. The comment also references the Proposed Project’s energy efficiency and mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Tunisia Johnson**  
**Johnson**    **February 9, 2020**  
**Response**

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Johnson-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Darlene J. Draper Martin**  
**Martin2**      **February 9, 2020**  
**Response**

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Martin2-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Dana C. Pearson**  
**Pearson**     February 9, 2020  
**Response**

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Pearson-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Michael Prudent**  
**M. Prudent**   February 9, 2020  
**Response**

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M. Prudent-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Tashana Prudent**  
**T. Prudent**   **February 9, 2020**  
**Response**

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T. Prudent-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter      Del Richardson**  
**Richardson   February 9, 2020**  
**Response**

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Richardson-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Darwin Scott**  
**Scott2**      **February 9, 2020**  
**Response**

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Scott2-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter  
Strong  
Response**      **Andrea Strong**  
February 9, 2020

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Strong-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**                      **Renee Thompson**  
**Re. Thompson** February 9, 2020  
**Response**

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Re. Thompson-1    This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**                    **Richard Thompson**  
**Ri. Thompson**    February 9, 2020  
**Response**

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Ri. Thompson-1    This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Tarron Wiley**  
**Wiley**      **February 9, 2020**  
**Response**

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Wiley-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Sam Williams**  
**Williams2**   **February 9, 2020**  
**Response**

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Williams2-1      This comment expresses support for the Proposed Project and notes that the Project Site has been mostly vacant for an extended period of time. The comment recognizes potential economic impacts of the Proposed Project. The comment also references the Proposed Project's energy efficiency and mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Christopher Agrella**  
**Agrella**      **February 24, 2020**  
**Response**

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Agrella-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Nyambo Anuluoha**  
**Anuluoha**    **February 24, 2020**  
**Response**

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Anuluoha-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **Viola Bales**  
**Bales**            **February 24, 2020**  
**Response**

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Bales-1            This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**            **Theresa Bruno**  
**Bruno**            **February 24, 2020**  
**Response**

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Bruno-1            This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Tony Burnett**  
**Burnett**      **February 24, 2020**  
**Response**

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Burnett-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Mai Coleman**  
**Coleman**    **February 24, 2020**  
**Response**

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Coleman-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter  
Cotton  
Response**      **Stephen Cotton**  
February 24, 2020

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Cotton-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Randall Curtis**  
**Curtis**      **February 24, 2020**  
**Response**

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Curtis-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **Diana David-Maria**  
**David-**            **February 24, 2020**  
**Maria**  
**Response**

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David-Maria-1    This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **Chamberlain Duru**  
**Duru**              **February 24, 2020**  
**Response**

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Duru-1              This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter            Form Letter 1**  
**Form Letter   February 24, 2020**  
**1**  
**Response**

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Form Letter 1-1    This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Form Letter 2**  
**Form Letter**   February 24, 2020  
**2**  
**Response**

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Form Letter 2-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **Form Letter 3**  
**Form Letter**   February 24, 2020  
**3**  
**Response**

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Form Letter 3-1    This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Jeanne Fischer**  
**Fischer**      **February 24, 2020**  
**Response**

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Fischer-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Ana Gamble**  
**Gamble**      **February 24, 2020**  
**Response**

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Gamble-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Halimah Ginyard**  
**Ginyard4**    **February 24, 2020**  
**Response**

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Ginyard4-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter  
Hellot  
Response**      **Christian Hellot**  
February 24, 2020

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Hellot-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Lu Jackson**  
**L. Jackson**   February 24, 2020  
**Response**

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- L. Jackson-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **RJ Jarreau**  
**Jarreau**         **February 24, 2020**  
**Response**

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Jarreau-1         This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter Lew Danielle Lew**  
**Response February 24, 2020**

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Lew-1            This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Michaela Marrafino**  
**Marrafino**    February 24, 2020  
**Response**

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Marrafino-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **Stephan Nelson**  
**Nelson**           **February 24, 2020**  
**Response**

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Nelson-1            This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **David Rice**  
**Rice**        **February 24, 2020**  
**Response**

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Rice-1            This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**      **Robert Smith**  
**R. Smith**    February 24, 2020  
**Response**

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R. Smith-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter      Dei Thomas**  
**D. Thomas   February 24, 2020**  
**Response**

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- D. Thomas-1      This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**            **Phyllis Covington Thompson**  
**P. Thompson**   February 24, 2020  
**Response**

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P. Thompson-1    This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter (page 1 of 1)

**Letter**      **Nathan Velasco**  
**Velasco**    **February 24, 2020**  
**Response**

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Velaso-1      This comment expresses support for the Proposed Project and opines on the thoroughness of the Draft EIR analyses. The comment also recognizes potential economic impacts and community benefits of the Proposed Project, and references air quality, lighting, and neighborhood protection measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.



Letter (page 1 of 1)

**Letter**            **Karen Vetter**  
**Vetter**            February 24, 2020  
**Response**

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Vetter-1            This comment expresses support for the Proposed Project and recognizes potential economic impacts of the Proposed Project. The comment also references noise, lighting, and transportation measures incorporated into the Project Design or included as mitigation in the Draft EIR. This comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Rodeway (page 1 of 1)

**Letter**      **Rodeway Inn**  
**Rodeway**    **March 5, 2020**  
**Response**

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- Rodeway-1      This introductory comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project. The presence of the 16,806 square foot Rodeway Inn & Suites motel located on a 0.66-acre parcel within the Arena Site is presented in Chapter 2, Project Description, Table 2-1 and in text on page 2-14 of the Draft EIR. In addition, the 38-room Roadway Inn & Suites motel is recognized in Draft EIR, Section 3.10, Land Use and Planning, page 3.10-5.
- Rodeway-2      The Draft EIR was released for public review on December 27, 2019 and comments were sought during an 89-day public comment period that ended on March 24, 2020. Pursuant to CEQA Guideline 15088, the City is responding to all comments received in this Final EIR. A formal public review of the Final EIR is not required under CEQA. Pursuant to Guideline 15089 (b), "Lead Agencies may provide an opportunity for review of the final EIR by the public or by commenting agencies before approving the project. The review of the final EIR should focus on the responses to comments on the draft EIR." Certification of the Final EIR for the Proposed Project will first be considered by the City Planning Commission, which will make a recommendation to the City Council pertaining to such certification, and then by the City Council prior to its consideration of the application for the Proposed Project. Whether there will be public hearings on the adequacy of the Final EIR are decisions that are at the discretion of the City Planning Commission and the City Council. The City will provide public notice of its consideration of the Draft and Final EIRs, and of the proposed entitlements for the Proposed Project, in accordance with applicable laws. The commenter is welcome to participate in further City proceedings, and any information it provides will be part of the record of proceedings for the Proposed Project. This comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.
- Rodeway-3      At the commenter's request, the commenter will be provided a copy of the public notices related to the Proposed Project, including any notices concerning the Final EIR, and has been added to the list of entities that have requested public notices related to the Proposed Project.

Letter Gerson (page 1 of 2)

Letter Gerson (page 2 of 2)

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**Letter**        **Andrew Gerson**  
**Gerson**        **March 5, 2020**  
**Response**

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Gerson-1        This introductory comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments Gerson-2 through Gerson-4.

Gerson-2        The Draft EIR addressed the environmental effects of the Proposed Project at the Project Site, which is the project applicant's proposed location. As required under CEQA, the Draft EIR considered the comparative environmental effects of a reasonable range of potentially feasible alternatives to the Proposed Project. Because some of those significant impacts identified are both unavoidable and related to conditions in and around the Project Site, the Draft EIR addressed five (5) alternatives involving the construction of a project that would potentially accomplish most of the basic objectives of the Proposed Project but at a different location in the City or region.

Alternative 7 (see Draft EIR, pages 6-81 through 6-96), analyzes the comparative impacts of locating the Proposed Project on the current site of The Forum. This analysis explores the potential to avoid or substantially lessen one or more significant environmental impacts of the Proposed Project, including the transportation-related impacts associated with concurrent events at the existing Forum venue and the Proposed Project. Alternative 7 anticipates demolition of The Forum because The Forum building is substantially smaller than, and does not include the features and amenities provided in, modern NBA arenas (see Draft EIR, page 6-83). A description of Alternative 7 is found starting on page 6-81 of the Draft EIR, and a comparative analysis of environmental effects of Alternative 7 is provided starting on page 6-86 of the Draft EIR.

In addition to The Forum building, The Forum site has physical capacity for up to 3,530 parking spaces. Due to current site constraints such as storage and other uses, approximately 2,500 spaces are available for private vehicle parking and 500 spaces are usable for Transportation Network Companies (TNCs), such as Uber and Lyft, during events at The Forum. As discussed on page 6-85 of the Draft EIR, construction and operation of the proposed Arena on The Forum site would require 4,125 on-site parking spaces, which would result in a net increase of 567-595 total spaces on The Forum site, and an increase of 1,625 in the

number of usable spaces. A majority of these spaces would be provided in a 3,525-space parking structure with the remaining spaces provided in surface lots and a small subterranean parking structure. As a result of the increase in parking on the Forum site, Alternative 7 would result in an increase in trips to and from the site compared to existing conditions. In addition, similar to existing operations at The Forum, Alternative 7 would require off-site overflow parking, which would likely be provided at surface or structured parking the HPSP area, except when those parking spaces are in use for events at the NFL Stadium.

As discussed on page 6-85 of the Draft EIR, regional access to The Forum Alternative site would be similar to but slightly different than access to the Project Site. While The Forum Alternative site and the Project Site are similar distances to the I-405 and I-110 freeways, The Forum Alternative site is further away from the I-105 freeway than the Project Site. Local access to The Forum Alternative site would be similar to access to the existing Forum concert and event venue provided by several major arterials, including South Prairie Avenue and West Manchester Boulevard with alternative connections to Florence Avenue, Hawthorne Boulevard, Crenshaw Boulevard and Arbor Vitae Street.

Finally, with respect to ingress/egress, two entrances on Kareem Court, and one entrance each on West Manchester Boulevard, South Prairie Avenue, and Pincay Drive currently provide vehicular ingress/egress to The Forum Alternative site. As discussed on page 6-85 of the Draft EIR, placement of the Proposed Project on The Forum site would utilize some of these existing vehicular access points. The on-site parking structure would be accessed from Kareem Court and West Manchester Boulevard, with access to surface parking provided from Pincay Drive. However, the vehicular access point on South Prairie Avenue would be eliminated, thus changing the flow of traffic in and out of The Forum Alternative site.

The Draft EIR includes the following summary of the impacts of developing the Proposed Project at The Forum Alternative site:

*Alternative 7 would involve the development of a similar amount of development and the same sized arena as under the Proposed Project, and thus impacts related to the intensity of use would be similar to those of the Proposed Project. Many of the transportation impacts of this Alternative are already occurring on the local street system around the Forum Alternative site, and thus would not be net new impacts resulting from Alternative 7. The demolition of the existing Forum building would eliminate the impacts of the Proposed Project created by scenarios of overlapping and concurrent events at The Forum, NFL Stadium, and Proposed Project arena. Further, because over 100 events per year are already occurring at The Forum, and because the*



*hotel use would be eliminated from Alternative 7, there would be a material decrease in net new VMT, criteria air pollutant emissions, energy demand, water demand, and GHG emissions compared to the Proposed Project. Alternative 7 would, however, result in the demolition of an historic structure that is listed on the National Register and the California Register; impacts to aesthetics and cultural resources that would be significant and unavoidable and which would not occur with the Proposed Project.*

As this summary notes, development of the Proposed Project at The Forum Alternative site involves tradeoffs, in that certain impacts would be avoided, but others would occur, as compared to the Proposed Project. This information will be available to the City at the time it considers whether to approve the Proposed Project or an alternative. The commenter’s preference for Alternative 7 is noted and will be forwarded to decision-makers for their consideration.

On March 24, 2020, it was announced that a company ~~with common ownership as the LA Clippers (CAPPS LLC) had affiliated with the project applicant~~ reached agreement with the Madison Square Garden Company (MSG) to acquire The Forum. Since the acquisition was finalized on May 4, 2020, the project ~~applicant~~ has not asked the City to shift its focus to The Forum site.

**Comment [U6]:** Global check on project applicant vs sponsor.

Gerson-3 This comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. The proposed schedule for construction of the Proposed Project is provided in Chapter 2 of the Draft EIR (see Draft EIR, pages 2-80 – 2-88). The Proposed Project, if approved, would be scheduled to commence operations in 2024. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Gerson-4 The Draft EIR addresses the impacts of the Proposed Project on the noise, vibration, and air quality environment of the neighborhood surrounding the Project Site discussed in the comment, and identifies all feasible mitigation measures for impacts that are determined to be significant. The discussion below addresses the feasibility and efficacy of the suggested mitigation strategies for air quality, noise, and vibration.

**Air Quality**

***Construction***

As presented in Draft EIR, Section 3.2, Air Quality, Subsection 3.2.4, Analysis, Impacts and Mitigation (see Table 3.2-14), construction of the Proposed Project would have the potential to temporarily generate air pollutant emissions in

excess of regional mass emission thresholds for volatile organic compounds (VOCs) and oxides of nitrogen (NO<sub>x</sub>). The Proposed Project would include a number of project design features to reduce emissions during construction, including the use of off-road diesel-powered construction equipment that meets or exceeds CARB and US EPA Tier 4 Final off-road emissions standards or equivalent, and the use of low-VOC architectural coatings (see detailed description of these design features on page 3.2-64 of the Draft EIR). Localized impacts, as presented in Tables 3.2-25 and 3.2-26 (see Draft EIR, pages 3.2-91 and -92), demonstrate that the nearby sensitive land uses, such as the homes on Doty Avenue listed in the comment, would not be exposed to pollutant concentrations in excess of applicable ambient air standards.

Because regional air pollutant emissions attributable to construction of the Proposed Project would exceed established significance thresholds, the City has identified a number of feasible and enforceable mitigation measures to reduce air emissions during construction. These mitigation measures, such as Mitigation Measure 3.2-2(c), include required use of heavy-duty haul trucks that are 2010 model year or newer; incentivizing the use of zero-emission or near-zero emission heavy-duty haul trucks; ensuring all construction equipment and vehicles are in compliance with the manufacturer's recommended maintenance schedule; and restricting construction vehicle idling time to no more than five minutes. Even with implementation of all feasible mitigation, regional emissions from the Proposed Project would remain in excess of significance thresholds.

A Health Risk Assessment (HRA) was prepared to evaluate the risk of potential negative health outcomes (cancer, or other acute or chronic conditions) related to exposure of nearby residents to airborne toxic air contaminants (TACs) that would be emitted during construction and operation of the Proposed Project (see Draft EIR, pages 3.2-97 to 3.2-102). For construction, the potential sources of Mobile Source Air Toxics (MSATs) and diesel particulate matter (DPM) emissions would be diesel-fueled heavy-duty equipment, on-road travel and idling of diesel-fueled haul trucks, and on-road travel of gasoline-fueled worker vehicles. For operation, the potential emission sources would be gasoline-fueled passenger vehicles travelling to and from the Project Site, diesel-fueled delivery trucks, diesel-fueled delivery trucks with transport refrigeration units (TRUs), and diesel-fueled emergency generators and emergency fire pumps. A dense receptor grid around the Project Site and surrounding roadways that would carry Proposed Project traffic captures the maximum health risk impacts to exposed air quality sensitive receptors. As shown in Tables 3.2-31 through -35, the Proposed Project emissions would not exceed SCAQMD's cancer risk significance threshold of an incremental increase of 10 in a million at any off-site receptors, including the housing units in the area addressed in the comment.

The comment suggests that the City impose a mitigation measure that would provide environmental upgrades at nearby residences, including sound insulation, air conditioning/ventilation, and new windows, to offset project-related air quality, noise, and vibration impacts. The City does not consider these strategies to be feasible methods for reducing regional air quality impacts because insulation is related to sound dampening, and windows by themselves, even newer models, do not impede exposure to air pollutants.

Enhanced filtration that would result from installation of new air conditioning or ventilation systems has been found to be effective, but only for particulate emissions, and only when combined with inoperable windows. The South Coast Air Quality Management District (SCAQMD) acknowledges that “filters are only effective when assumed to operate 100 percent of the time while residents are indoors and does not account for the times when the residents would have their windows or doors open. The use of these filters would also require HVAC systems to be running which would include an increase in energy cost to the resident. Lastly, filters have no ability to filter out any toxic gasses commonly generated from vehicle exhaust”.<sup>12</sup> In addition, as noted in the comment, not all other property owners or residents may accept the upgrade offers.

For the reasons noted above, the suggested measures were deemed infeasible for the purposes of mitigating construction air emissions generated by the Proposed Project, and were therefore appropriately not included in the Draft EIR.

### ***Operation***

As presented in Tables 3.2-15 through -23 (see Draft EIR, pages 3.2-76 to -80), operation of the Proposed Project would result in emissions in excess of applicable mass emission thresholds for volatile organic compounds (VOC), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). The Draft EIR also presents the results of refined localized impact assessments of Proposed Project-generated concentrations of NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> at air quality sensitive receptor locations surrounding the Project Site (see Draft EIR, pages 3.2-91 to 3.2-94). Dispersion modeling demonstrates that Proposed Project-generated emissions of NO<sub>2</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> would not result in exceedances of applicable standards at any sensitive land uses (i.e., residences) in the vicinity of the Project Site. Additionally, as shown in Tables 3.2-31 through -35, health risks from construction and operation of the Proposed Project would not result in significant health impacts. These analyses demonstrate that while the Proposed Project would generate regional emissions

<sup>12</sup> South Coast Air Quality Management District, Draft Environmental Impact Report (DEIR) for the Pepper Avenue Specific Plan (State Clearinghouse No.: 2016021047), April 21, 2017.

above the thresholds of significance, the impacts to sensitive receptors near the Project Site would be less than significant.

In order to reduce significant regional emissions resulting from operation of the Proposed Project, a number of feasible and enforceable project design features (PDFs) and mitigation measures were identified in the Draft EIR. PDF 3.2-2, described on page 3.2-65 of the Draft EIR, would include:

- The use of emergency generators selected from the SCAQMD certified generators list and that meet applicable federal standards for diesel emissions;
- Testing of the generators for maintenance and operations purposes only during non-event days; and
- Prohibiting heavy-duty delivery trucks from traveling to and from the Project Site during the two hours before and one hour after an event of more than 9,500 attendees at the Proposed Project arena, and during pre-and post-event hours during major event days at the NFL Stadium and/or The Forum.

The Draft EIR mitigation measures intended to substantially lessen the Proposed Project-generated regional air emissions include implementation of a Transportation Demand Management (TDM) program that on major event days would incorporate a shuttle program to facilitate multi-modal travel to and from events at the Project Site and stations on the LA Metro Crenshaw and Green lines. Implementation of these PDFs and mitigation measures would serve to reduce air quality emissions during the operational phase of the Proposed Project.

For reasons similar to those described above for construction impacts, the City does not consider the suggested strategies (sound insulation, air conditioning/ventilation, and new windows) to be feasible strategies for reducing Proposed Project operational regional air quality impacts. First and foremost, the significant emissions impacts identified in the Draft EIR are regional in nature, and the mitigation suggested in the comment would not mitigate those impacts. The Draft EIR determined that localized air pollutant concentration impacts would be less than significant, and would not require mitigation. Further, as explained above, sound insulation and new windows would not impede exposure to air pollutants, and enhanced filtration would only be effective for particulate emissions when combined with inoperable windows. Bedrooms below the fourth story of a building must have at least one exterior emergency escape and rescue opening, which most frequently means an operable and openable window, but which could also mean a door to the

exterior.<sup>13</sup> Therefore, inoperable or un-openable windows in homes, particularly in bedrooms, are not considered feasible in residential units in the vicinity of the Project Site. Finally, as noted in the comment, not all affected property owners or residents may accept the upgrade offers.

For the reasons noted above, the suggested measures are considered infeasible for the purposes of mitigating operational regional emissions generated by the Proposed Project. Localized impacts are considered less than significant and therefore no further mitigation is required. For these reasons, the mitigation measures suggested in the comment were not included in the Draft EIR.

### **Noise**

As discussed in Draft EIR, Section 3.11, Noise, construction and operation of the Proposed Project would result in increases in ambient noise levels. The Proposed Project would include a number of strategies to reduce exposure of receptors to significant noise levels during construction and operation, and the City has mandated a number of mitigation measures to reduce the impacts to the extent feasible. The comment identifies a large geographic boundary and suggests mitigation to reduce impacts in that entire geographic area. However, the Draft EIR discloses that significant impacts only occur in a portion of the geographic area identified in the comment, not the entirety of the area. Although some impacts are considered in the Draft EIR to be significant and unavoidable, the environmental upgrades requested in the comment, including sound insulation, air conditioning/ventilation, and new windows and filtration, are not considered feasible methods to reduce the significant impacts of the Proposed Project.

### ***Construction***

To ensure that construction-related noise levels would be minimized, a number of strategies are described to be part of the Proposed Project, including the placement and construction of temporary and permanent sound barriers along the southern boundary of the Arena Site and shared boundaries of the Arena Site and adjacent sensitive receptors (see Draft EIR, pages 3.11-78 and 3.11-79). In particular, the City has identified Mitigation Measure 3.11-1 (see Draft EIR, page 3.11-103) that would require implementation of a Construction Noise Reduction Plan that would be submitted to and approved by the City prior to the issuance of any demolition or construction permit for each phase of project development. Mitigation Measure 3.11-1 also would require the Proposed Project to designate a Community Affairs Liaison. The Community Affairs Liaison would augment the measures identified in the Construction Noise Reduction Plan by providing a contact point for members of the community concerned about

<sup>13</sup> California Building Code, 2019, Section 1030 Emergency Escape and Rescue. Available: <https://up.codes/viewer/california/ibc-2018/chapter/10/means-of-egress#1030>. Accessed May 2, 2020.

Project construction noise. The Community Affairs Liaison would be able to help identify and address in real time construction noise issues by investigating any noise complaints related to Project construction activities and attempting to identify and implement feasible, reasonable adjustments in response.

Noise generated by construction activities is inherently intermittent. The level of construction activity, equipment used, and location within the Project Site – and the noise associated with those activities – would fluctuate over the course of any given day, and furthermore would change over the course of the construction schedule as the focus of activities progresses from site preparation and excavation to erection of structures to interior finish work. The Construction Noise Reduction Plan would include temporary and permanent noise barriers and feasible measures to reduce construction noise at the source. The measures required in the Construction Noise Reduction Plan and the role of the Community Affairs Liaison are appropriate given the nature of construction noise.

Even with implementation of the prescribed strategies and mitigation measures identified in the Draft EIR, construction noise impacts would remain significant for noise-sensitive receptors adjacent to the Arena Site to the north (along West Century Boulevard) and adjacent to the Arena Site to the south (receptors on the north side of 104th Street), as well as receptors along South Prairie Avenue, Manchester Boulevard and West Century Boulevard due to construction traffic.

To clarify the role and responsibilities of the Community Affairs Liaison, Mitigation Measure 3.11-1 on pages 3.11-103 and -104 of the Draft EIR is revised to read:

**Mitigation Measure 3.11-1**

*Construction Noise Reduction Plan. Prior to the issuance of any demolition or construction permit for each phase of project development, the project applicant shall develop a Construction Noise Reduction Plan to minimize daytime and nighttime construction noise at nearby noise sensitive receptors. The plan shall be developed in coordination with an acoustical consultant and the project construction contractor, and shall be approved by the City Chief Building Official. The Plan shall include the following elements:*

- *A sound barrier plan that includes the design and construction schedule of the temporary and permanent sound barriers included as project design features for the Project, or sound barriers that achieve an equivalent or better reduction in noise levels to noise-sensitive receptors.*
- *Buffer distances and types of equipment selected to minimize noise impacts.*
- *Haul routes subject to preapproval by the City.*

- *Construction contractors shall utilize equipment and trucks equipped with the best available noise control techniques, such as improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds, wherever feasible.*
- *Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust and external jackets shall be used where feasible to lower noise levels. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible.*
- *Stationary noise sources (e.g., generators) shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or other measures to the extent feasible. Pole power shall be utilized at the earliest feasible point in time, and to the maximum extent feasible in lieu of generators. If stationary construction equipment such as diesel- or gasoline-powered generators, must be operated continuously, such equipment must be located at least 100 feet from sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.*
- *Use of “quiet” pile driving technology (such as auger displacement installation), where feasible in consideration of geotechnical and structural requirements and conditions.*
- *Designate a Community Affairs Liaison and create a telephone hotline and email address to reach this person, with contact information conspicuously posted ~~post this person's number~~ around the Project Site ~~project site~~, in adjacent public spaces, and in construction notifications. If the Community Affairs Liaison hotline is not staffed 24 hours per day, the hotline shall provide an automatic answering feature, with date and time stamp recording, to answer calls when the phone is unattended. The Community Affairs Liaison shall be responsible for responding to any local complaints about construction activities associated with the Proposed Project.*

*~~The This Community Affairs Liaison shall investigate, evaluate, and attempt to resolve noise complaints related to construction activities of the Proposed Project receive all public complaints about construction noise disturbances and be responsible for determining the cause of the complaint and implementation of feasible measures to be taken to alleviate the problem. The Community Affairs Liaison shall coordinate with a designated construction contractor representative to implement the following: for the purpose of investigating the noise disturbance and undertaking all feasible measures to protect public health and safety.~~*

  - *Document and respond to each noise complaint.*

- Attempt to contact the person(s) making the noise complaint as soon as feasible and no later than one business day.
- Conduct a prompt investigation to attempt to determine if construction activities related to the Proposed Project contribute a substantial amount of noise related to the complaint.
- If it is reasonably determined by the Community Affairs Liaison that construction-related noise described in the complaint exceeds ambient exterior noise levels by 5 dBA or more at a noise sensitive use, then the Community Affairs Liaison shall identify and implement feasible reasonable measures within the Project Site to address the noise complaint.

Examples of reasonable measures that may be implemented within the Project Site include, but are not limited to:

- Confirming construction equipment and related noise suppression devices are maintained per manufacturers' specifications;
  - Ensuring construction equipment is not idled for extended periods of time; and/or
  - Evaluating feasible relocations of equipment, alternatives to specific types of equipment, or resequencing of construction activities, as appropriate, while maintaining the project schedule and safety.
- *Adjacent noise-sensitive residents and commercial uses (i.e., educational, religious, transient lodging) within 500 feet of demolition and pile driving activity shall be notified of the construction schedule, as well as the name and contact information of the project Community Affairs Liaison.*

According to the Draft EIR (see Draft EIR, page 3.11-100), “[t]he Proposed Project would generate temporary construction noise that would potentially increase ambient noise levels in the area, but these temporary increases would not represent a long-term change to the noise environment around the Project Site” and construction noise would occur on a “fluctuating and intermittent basis over” the construction period (page 3.11-60). Permanent improvements to residences as suggested in the comment are not considered reasonable feasible mitigation measures for impacts that are temporary and intermittent. Rather, addressing construction noise in direct response to complaints as required by Mitigation Measure 3.11-1 is the most effective method to mitigate construction noise impacts. Furthermore, the Draft EIR acknowledges that “the Proposed Project includes the installation of temporary and permanent sound walls, the most effective measure to reduce construction noise impacts,” (page 3.11-104). The effectiveness of permanent improvements to offsite noise-sensitive receptors in reducing indoor noise is highly dependent on windows and doors



remaining closed, which would impede natural ventilation, and as noted in the comment, not all property owners or residents may be willing to accept the upgrade offers. For the reasons described above, the measure is considered infeasible.

### ***Operation***

To minimize operational noise levels, a number of strategies are proposed to be incorporated into the Proposed Project, including the placement and construction of permanent sound barriers along the southern boundary of the Arena Site and shared boundaries of the Arena Site and adjacent sensitive receptors (see Draft EIR, pages 3.11-78 and 3.11-79). As shown in Tables 3.11-24 and 3.11-25 (see Draft EIR, pages 3.11-147 to -148), as well as in Figures 3.11-15 to 3.11-17 (see Draft EIR, pages 3.11-150 to -152), no residences within the area identified in the comment would be exposed to significant operational noise impacts. However, despite the inclusion of these strategies, the Proposed Project would generate significant operational noise impacts at some sensitive receptors to the north and west of the Project Site. Thus, the Draft EIR identifies a number of mitigation measures to further reduce operational noise levels, including Mitigation Measure 3.11-2 (see Draft EIR, pages 3.11-158 to -159) which would require the implementation of an Operations Noise Reduction Plan that would be prepared and approved by the City prior to issuance of the first building permit for the Plaza and verified prior to issuance of the Certificate of Occupancy for the first Plaza building and revised thereafter on an as-needed basis to address noise-related design details added over time. The Operations Noise Reduction Plan would be used to effectively and feasibly guide design so as to reduce project-related operational noise levels at adjacent offsite receptors from the rooftop restaurant and other sources.

The Operations Noise Reduction Plan would be required to include operational noise reduction measures such as sound enclosures for stationary mechanical equipment; locating mechanical equipment at the furthest feasible distance from offsite noise-sensitive receptors; strategic design of the outdoor stage area and associated speaker layout, directivity, orientation, and volume control; use of sound-absorbing materials on the exterior of Plaza buildings that would reduce or minimize noise level in and emanating from the Plaza area; and enclosure of rooftop restaurant spaces to minimize operational noise levels. While the noise impacts of the Proposed Project would remain significant and unavoidable in areas surrounding the Project Site even with implementation of the mitigation measures identified in the Draft EIR, the less-than-significant operational noise impacts at housing units to the south and east of the Project Site, referred to in the comment, would be even further reduced.

**Comment [U7]:** APPLICANT TEAM: Consider whether we should add revisions to MM 3.11-2(a) (CAL for construction light) to correlate to changes shown above re: Community Affairs Liaison.

**Comment [U8]:** Yes, agree this addition is appropriate.

**Comment [U9]:** Also need parallel changes to MM 3.11-3(c) for vibration.

To add clarifying details, Mitigation Measure 3.11-2(a) on page 3.11-158 of the Draft EIR is revised to read:

**Mitigation Measure 3.11-2(a)**

Operations Noise Reduction Plan. The project applicant shall prepare an Operations Noise Reduction Plan which shall include measures designed to minimize impacts to offsite noise-sensitive land uses. for major event pre- and post-event conditions that results in composite noise levels from amplified sound and mechanical equipment of no more than 3 dBA over ambient conditions at any noise sensitive receptor. The level of noise reduction to be achieved by the Operations Noise Reduction Plan shall be documented by a qualified noise consultant and submitted to the City. The Operations Noise Reduction Plan shall be submitted to and approved by the City prior to the issuance of the first Plaza building permit and verified prior to the issuance of the Certificate of Occupancy for the first Plaza Building, and revised on an as-needed basis to address noise-related design details added thereafter. first major event at the Arena. Noise reduction strategies could include, but are not limited, the following.

The Operations Noise Reduction Plan shall include the following:

- Construction of Construct the permanent sound barriers included in the Project as project design features (as depicted on Figure 2-19 of the Draft EIR), or construction of permanent sound barriers that achieve an equivalent or better noise reduction as the permanent sound barriers proposed as project design features.
- Equip Design and install noise generating mechanical equipment, including such as emergency generators, transformers, and/or HVAC units so that such equipment will not cause exceedance of the ambient conditions by more than 3 dBA at any noise sensitive receptor by means of acoustical enclosures, silencers, barriers, relocation, and/or other noise-reducing approaches with sound enclosures.
- Locate noise generating mechanical equipment at the furthest feasible distance from sensitive receptors as feasible.
- Enclose the rooftop restaurant space with a material such as glass, with a minimum density of 3.5 pounds per square foot (3.5 lbs/sf), that is at least 60 inches high, and has no gaps between each panel or between the panel floor, and as allowed by building code, that would serve as a noise barrier that would provide a minimum of 8 dBA sound insertion loss.
- Design any amplified sound system, equipment, and/or structures in the Plaza to ensure that aggregate noise from mechanical and amplified sound result in noise levels no greater than 3 dBA over ambient conditions (1-hour Leq) at any noise sensitive receptor

during major event pre- and post-event conditions. Measures to achieve this standard may include, but are not limited to:

- Design the outdoor stage and sound amplification system (placement, directivity, orientation, ~~and/or~~ number of speakers, and/or maximum volume) so as to limit noise levels near noise-sensitive receptors.
- Utilize sound-absorbing materials on the exterior of Plaza buildings structures where appropriate and effective to reduce noise levels at adjacent off-site sensitive receptors.
- Enclose the rooftop restaurant space with a material that would serve as a noise barrier such as glass.

Project-related traffic noise level increases along the majority of the roadway segments in the area identified in the comment would be less than the 3 dBA significance threshold. Along segments of South Prairie Avenue, Yukon Avenue, and West 104th Street, traffic noise level increases as measured at the property line would be higher than 3 dBA under Major Event Post Event conditions, and thus would be significant. Specifically, all three roadways would experience significant traffic noise increases under the following conditions:

Adjusted Baseline plus Major Event Weekday Post Event (see Figure 3.11-8); Adjusted Baseline plus Major Event Weekend Post Event (see Figure 3.11-9); Cumulative Plus Project Major Event Weekday Post Event (see Figure 3.11-21); Cumulative Plus Project Major Event Weekend Post Event (see Figure 3.11-22); Cumulative Stadium Mid-Sized Event Plus Forum Concert Plus Project Major Event Weekday Post Event (see Figure 3.11-23); and Cumulative Stadium NFL Game Plus Forum Concert Plus Project Major Event Weekend Post Event (see Figure 3.11-25). South Prairie Avenue and Yukon Avenue would experience significant traffic noise increases under the Adjusted Baseline Plus Stadium Mid-Sized Event Plus Forum Concert Plus Project Major Event Weekday Post Event condition (see Figure 3.11-10). South Prairie Avenue and West 104<sup>th</sup> Street would experience significant traffic noise increases under the Cumulative Stadium NFL Game Event Plus Forum Concert Plus Project Major Event Weekend Pre Event condition (see Figure 3.11-24). As discussed on page 3.11-137 of the Draft EIR, impacts related to Project-related traffic noise would occur during Major Event Post-Event conditions (9:30 PM to 10:30 PM) on weekdays and weekends which could generate significant traffic noise level increases up to 15 – 25 times a year. However, after post-event traffic leaves the Project area, affected roadway segments would no longer be exposed to elevated traffic noise due to major events hosted at the Proposed Project arena.

**Comment [U10]:** Would bullet points for the scenarios help readability in this paragraph?

In order to mitigate traffic noise levels, the Draft EIR describes the implementation of a Transportation Demand Management (TDM) Program. The

TDM Program described in Mitigation Measures 3.14-1(a) (see Draft EIR, page 3.14-190), and 3.14-2(b) (see Draft EIR, page 3.14-195) includes strategies, incentives and tools to reduce single-occupancy vehicle trips and enhance the use of modes of transportation besides automobile travel to and from the Proposed Project. Key elements of the TDM Program would include the following:

- Encourage Alternative Modes of Transportation (Rail, Public Bus, and Vanpool);
- Event-day dedicated shuttle service to provide connectivity to the existing and future Metro Rail stations;
- Encourage carpools and zero-emission vehicles;
- Encourage Active Transportation (bicycle parking, provide showers and lockers for employees, bicycle fix-it station, provide bike valet services, coordinate bike pools and walk pools, and sidewalks or other designated pathways following safe routes from the pedestrian circulation to the bicycle parking facilities);
- Employee vanpool program;
- Park-n-Ride Program, providing a regional park-n-ride program that would utilize charter coach buses;
- Information services to provide services to inform employees about transportation options;
- Reduce on-site parking demand by providing coach bus/minibus/microtransit staging and parking areas;
- Event Day Local Microtransit Service; and
- On-going monitoring program to assess the extent to which the TDM Program is meeting demand for alternative forms of transportation and reducing vehicle trips.

As discussed on page 3.14-56 of the Draft EIR, the implementation of the full TDM Program would ~~achieve and maintain a 15-percent reduction in~~ reduce the number of vehicle trips, collectively, by attendees, employees, visitors, and customers as compared to operations absent the TDM Program. Although, the precise degree of effectiveness of proposed TDM strategies and the effect of reduced vehicle trips on reducing noise levels is uncertain, and therefore was not accounted for in mitigated traffic volumes (pages 3.14-206 and 3.11-159 of the Draft EIR), a reduction in vehicular traffic volume would reduce noise levels associated with the Proposed Project.

The mitigation strategies suggested by the commenter, such as the addition of insulation or new windows, could reduce indoor noise levels from traffic-

generated noise sources to varying degrees depending on the building construction and the type and extent of insulation and/or windows that may be added, but would have no effect on the significant property-line impacts disclosed in the Draft EIR. As noted in the comment, not all property owners or residents may be willing to accept the upgrade offers, and, thus, the measure is considered infeasible. The most effective way to reduce traffic-related noise, including special event traffic noise, is to reduce the amount of traffic volume on roadways. Reduction of noise levels is most effective at the source, rather than at the receiver. As a result, the building upgrades suggested in the comment are not warranted and/or feasible methods of mitigating traffic noise impacts identified in the Draft EIR.

~~considered infeasible methods of mitigating the significant impacts of the Proposed Project.~~

### **Vibration**

The environmental upgrades suggested in the comment, including sound insulation, air conditioning/ventilation upgrades, and installation of new windows and filtration, would not provide any vibration reduction. On the other hand, Mitigation Measures 3.11-3(a), 3.11-3(b), and 3.11-3(c) would minimize construction-related vibration impacts, by ensuring that proper setback distances would be implemented for vibratory equipment, that potential building damage is identified and repaired, and that a Community Affairs Liaison is designated to ensure proper implementation of mitigation and to address disturbances in an efficient and timely manner.

The building upgrades suggested in the comment are not warranted and/or feasible because (1) no significant vibration impacts would affect the residences addressed in the comment, which are located east of South Prairie Avenue, west of Yukon Avenue, south of 102nd Street, and north of 104th Street, and (2) such building upgrades, including sound insulation, air conditioning/ventilation, new windows and filtration, would not reduce the Proposed Project-related construction vibration impacts.

Gerson-5

This concluding comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

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Letter Espinoza (1 of 1)

**Letter**      **Nina Espinoza**  
**Espinoza**    **March 7, 2020**  
**Response**

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Espinoza-1      This introductory comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments Espinoza-2 through Espinoza-5.

Espinoza-2      The comment is correct that large crowds at event venues, such as The Forum, may place increased demands on the capacity of telecommunications facilities. If many patrons attempt to use cell phones at the same time, including connections to ride-hailing services, the capacity of nearby digital systems may be insufficient, leading to slow service, lack of connection, or dropped calls. These peaks in demand may occur immediately before or after events.

The project applicant does not have control over all aspects of cell phone internet connectivity in the vicinity of the Project Site. However, in regards to ridesharing (Uber and Lyft), the Proposed Project would construct and operate a rideshare pick-up area as part of the East Transportation Hub. For post-event pick-ups, the Arena itself would be placed in a geofenced area and attendees requesting a rideshare vehicle would be directed to meet the rideshare vehicle at the East Parking Garage. This would be similar to the current approach used at LAX for ride share hailing. This is required as an element of Mitigation Measure 3.14-2(a) and is described further in the Draft Event Transportation Management Plan included in Draft EIR, Appendix K.4.

Therefore, to the extent that cell phone connectivity were to be an issue, this should not add materially to congestion on the streets surrounding the Project Site, since rideshare vehicles would not be circling around the streets waiting to find their riders but rather would be staged off-street at the East Parking Garage.

Like other parts of the Event TMP, performance would be monitored and adapted over time. The Event TMP requires annual monitoring to support ongoing adaptation to dynamic event conditions. The Event TMP, page 44, states:

*The Event TMP will be a dynamic document that is expected to be revised and refined as monitoring is performed, experience is gained, additional information is obtained regarding the*



*Proposed Project's transportation characteristics, and advances in technology or infrastructure become available.*

It further states:

*Prior to each scheduled monitoring event, a meeting will be held with the City and the IBEC operator to identify the specific monitoring locations, durations, and staffing responsibilities. A follow-up meeting will occur during the week immediately following each event to discuss the monitoring observations and identify what modifications to the TMP should be implemented for subsequent events.*

In order to promote connectivity in and around the project Arena, the Proposed Project includes upgrades to telecommunication facilities at the Project Site which are intended to improve connectivity in the area. As stated on page 2-80 of the Draft EIR:

*A distributed antenna system (DAS) will be installed at the Project Site to provide cellular and emergency communications connections. DAS systems use a series of antennas to distribute signals in dense areas. Antennas can be integrated into building facades, installed on the interiors of building spaces, or be mounted on exterior structures such as poles.*

In the event that the proposed DAS system is insufficient to meet the demands, the monitoring program included in the Event TMP would provide the framework for further expansion of the DAS system ensure effective connectivity that support the implementation of the Proposed Project's Event TMP and TDM program.

Espinoza-3 Please see Response to Comment Espinoza-2.

Espinoza-4 It is possible that some of the people attending events at the Proposed Project may use services such as VRBO or AirBnB to secure short-term rentals near the City or in the larger vicinity. Based on the City's experience at The Forum, short-term rentals are not expected to accommodate a large percentage of event attendees. If attendees do secure short-term rentals nearby, they may be able to carpool or use transit to travel to the Project Site, which would decrease congestion.

Issues related to the benefits to City residents associated with short-term rentals are economic and/or social in nature. There is no evidence in the comment nor conclusions based on evidence that connect the comment to environmental issues. CEQA Guidelines section 15131 of the provides that a lead agency include or present economic or social information in an EIR, in any form it desires. CEQA Guidelines section 15131 establishes that "[e]conomic or social

effects of a project shall not be treated as significant effects on the environment.” It also prescribes how social and economic information may be used in a CEQA document, stating that economic or social effects may be used to “trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused the economic or social changes,” “to determine the significance of physical changes caused by the project,” and “together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR.” CEQA Guidelines section 15131(a) provides that “[t]he intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.”

Espinoza-5 The Project Site does not include existing housing. The Proposed Project does not propose to include housing. The Proposed Project also does not include rezoning industrial sites in nearby areas to allow accessory dwelling units. Thus, any effects on housing or affordability would be indirect. The comment is correct that the availability and affordability of housing in the region are significant policy concerns.

The Proposed Project is not expected to have a significant impact on the supply or affordability of housing in the City. The Draft EIR addresses this issue in two contexts. First, Draft EIR, Section 3.12, Population, Employment, and Housing, addresses the potential for the Proposed Project to have a significant impact on population, employment and housing. With respect to housing, the analysis focuses on the potential for the Proposed Project to cause or contribute to the ongoing process of “gentrification,” resulting in undesirable displacement of existing housing and residents. The City retained an economic consulting firm, ALH Urban & Regional Economics (ALH), to examine this issue. The ALH study, *Inglewood Sports and Entertainment Venue Displacement Study*, July 2019, is attached as Appendix S in the Draft EIR. The study concluded that there was insufficient evidence “to connect the Proposed Project to gentrification and related displacement that could result in the need for the construction of replacement housing” (see Draft EIR, page 3.12-17).

Second, Chapter 4, Other CEQA-Required Considerations, of the Draft EIR addresses whether the Proposed Project may set in motion social or economic phenomena that culminate in physical deterioration of the City (referred to as “urban decay”). This analysis concludes: “[T]he City does not anticipate that the Proposed Project would result in conditions that would contribute to or cause urban decay of retail commercial space or sports and entertainment arena venues in the local market” (Draft EIR, page 4-22).

The comment proposes that the City consider rezoning industrial land to accommodate Additional Dwelling Units. No evidence is presented in the comment to connect this proposal to a potentially significant impact of the Proposed Project. As such, CEQA does not require the City to consider adopting this proposal in the context of mitigation of a significant impact of the Proposed Project. The City does, however, have the discretion to consider such a proposal as a matter of policy. The comment therefore be forwarded to the City for its consideration, either as part of the Proposed Project, or in the context of the City's overall housing policy.

Espinoza-6 This concluding comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

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Letter Sambrano (page 1 of 4)

Letter Sambrano (2 of 4)

Letter Sambrano (3 of 4)

Letter Sambrano (4 of 4)



**Letter**  
**Sambrano**  
**Response**

**L. Diane Sambrano**  
 March 17, 2020

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Sambrano-1 This introductory comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments Sambrano-2 through Sambrano-25.

Sambrano-2 This comment expressing opposition to the Proposed Project does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Sambrano-3 This comment incorrectly states that the lives of people impacted by the Proposed Project were not a consideration in the environmental impact report. The Draft EIR for the Proposed Project was written consistent with the CEQA Guidelines, which as required by PRC section 21083, includes criteria to determine “whether or not a proposed project may have a significant effect on the environment”, including if the “environmental effects of a project will cause substantial effects on human beings, either directly or indirectly.”

Sambrano-4 This comment expressing opposition to the Proposed Project does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

The comment expresses skepticism regarding the objectivity of the EIR’s analysis. The comment’s skepticism is noted. The City notes, however, that the analysis was prepared by professionals with expertise in the various subjects addressed by the EIR. These professionals worked under the direction of the City, not the project applicant. The EIR reflects a good-faith effort to provide a thorough, objective analysis of the Proposed Project’s impacts. The City does not believe that the analysis is tainted by improper motives. The comment’s skepticism in this regard is noted.

This comment incorrectly states that the Draft EIR did not recognize that the Proposed Project is not an isolated project. The Draft EIR for the Proposed Project was written consistent with the CEQA Guidelines. CEQA Guidelines section 15130 requires that an EIR discuss cumulative impacts of a project when a project’s incremental effect is cumulatively considerable. As defined in CEQA Guidelines section 15355, a cumulative impact consists of an impact that is

created as a result of the combination of a project evaluated in the EIR together with other past, present, and reasonably foreseeable projects causing related impacts. As a cumulative analysis was provided for each issue topic in accordance with the CEQA Guidelines, the Proposed Project was not considered in isolation. Instead, the Proposed Project was considered in the context of other past, present and reasonably foreseeable future development in the area.

Sambrano-5 This comment incorrectly states that there have been steps taken to keep the public from awareness and genuine participation. In accordance with CEQA, the City issued a NOP which began a 30-day comment period beginning on February 20, 2018, and ending on March 22, 2018. The City distributed the NOP to governmental agencies, organizations, and persons interested in the Proposed Project. The City sent the NOP to agencies with statutory responsibilities in connection with the Proposed Project and requested their input on the scope and content of the environmental information that should be addressed in the EIR. The City Economic and Community Development Department's Planning Division held a Scoping Meeting on March 12, 2018, at Inglewood City Hall to provide information about the Proposed Project and the anticipated CEQA process, and to receive comments regarding the scope of the EIR.

The City circulated the Draft EIR for public review and comment beginning on December 27, 2019, through March 24, 2020, a period of 89 days, or just under twice the amount of time required by CEQA. Further, the Draft EIR is available online at two websites ([www.ibecproject.com](http://www.ibecproject.com) and <https://www.cityofinglewood.org/1036/Murphys-Bowl-Proposed-NBA-Arena>). The Draft EIR is also available for review at three physical locations: Inglewood City Hall, Economic and Community Development Department; the City of Inglewood Main Library; and the Crenshaw-Imperial Branch Library.

The comment states that the City has not complied with the Brown Act with respect to the Proposed Project. The comment does not identify the specific occasions when, in the commenter's view, the City did not comply with the Brown Act. For this reason, no further response is possible.

Sambrano-6 The comment implies that the Proposed Project and the NFL Stadium project are joint projects, or somehow connected. The NFL Stadium is located in the "Hollywood Park Specific Plan" area. In addition, the NFL Stadium was approved by voter initiative and did not undergo an environmental analysis. While no CEQA analysis was conducted specifically for the NFL Stadium and the voter initiative, there was an environmental analysis conducted for the Hollywood Park Redevelopment Project and expansion of the entertainment district.<sup>14</sup> The Proposed Project, by contrast, is not within the Hollywood Park

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<sup>14</sup> City of Inglewood, 2008. Hollywood Mixed-Use Project EIR. State Clearinghouse No. 2007111018.

Specific Plan area, is proposed by a different project applicant, and is undergoing a comprehensive environmental analysis to examine and disclose potential environmental impacts to the public. That analysis is provided in the multi-volume Draft EIR and its nearly three dozen volumes of appendices and discusses potential impacts in close proximity to the Project Site as well as farther out, as applicable.

The comment is correct that certain of the impacts of the Proposed Project extend beyond a 300-foot radius surrounding the Project Site. The EIR did not limit its analysis to impacts within a 300-foot radius. The transportation analysis, for example, encompasses 114 study intersections and 28 neighborhood street segments within an approximately 20-square-mile study area, including the corridors connecting to the major freeways that would provide regional access to the Proposed Project.

The Proposed Project provided multiple opportunities for the public to learn about and comment on the Proposed Project and its environmental analysis. See Response to Comment Sambrano-5.

Sambrano-7 This comment takes issue with the release of the Draft EIR. While the Draft EIR was released in late December (December 27, 2019) in between the Christmas and New Year holidays, the comment period was extended to March 24, 2020. This is a total of 89 days for the public comment period, which is almost double the required 45-day comment period required by CEQA. In addition, the commenter incorrectly states that the Draft EIR was only made available in two locations and online in an unreadable format. Hard copies of the Draft EIR were made available in three locations: the City of Inglewood Main Library, Inglewood Crenshaw-Imperial Branch Library, and the City of Inglewood Economic and Community Development Department. The City did not receive requests for additional hard copies. Internet access copies were provided through two weblinks. Any computer with any web browser (i.e., Google Chrome, Internet Explorer, Firefox, etc.) could open these links and the web copies of the Draft EIR. No additional computer programs were necessary in accessing these web-based documents.

Sambrano-8 While there are approximately five videos on YouTube suggesting that a new bowling center is coming to Inglewood, those videos do not provide any evidence that a bowling center is or ever was planned for the Project Site. Neither the project applicant nor the City created a video, or multiple videos, to give the illusion that the Project Site would be developed as a bowling alley. The City has not received any applications or proposals to construct a bowling alley at the site.

The EIR includes a description of historic uses of the site, including uses proposed for the site (see Draft EIR, pages 3.10-3 – 3.10-5). In 1993, the City approved the *Inglewood International Business Park Specific Plan*, which encompassed portions of the Project Site. The EIR acknowledges and describes this plan (see Draft EIR, pages 3.10-24 – 3.10-25). Under this plan, the Project Site was considered as a possible location for a technology park. However, there were several hurdles to that potential use including a partially occupied and partially vacant site, no identified project applicant, and no project application has ever been submitted to the City. For these reasons, the uses proposed under this plan have not been implemented, and the Project Site remains largely vacant.

The comment also suggests that the Proposed Project would have a negative social impact on the community, or remove housing or demolish a neighborhood, similar to the actions that were taken at Chavez Ravine for the development of Dodger Stadium. The Proposed Project would not remove any housing nor displace any residents. The Proposed Project is anticipated to be an economic engine for Inglewood, providing jobs and economic opportunity for the community. Additionally, the Proposed Project would provide community benefits not only through the provision of onsite amenities, but also through an extensive community benefits package that includes, for example, up to \$80 million for the acquisition, preservation, or development of affordable and mixed-income housing in Inglewood, along with more than \$12 million for youth and education programs, and up to \$6 million towards renovating the public library and financial assistance for renters and first-time homeowners in the city.

Sambrano-9 As described in Chapter 2, Project Description and analyzed in Draft EIR, Section 3.14, Transportation and Circulation, the Proposed Project would construct three parking garages onsite for use by patrons and employees of uses at the Proposed Project. The West Parking Garage would have 3,110 parking spaces; the South Parking Garage would have 650 parking spaces; and the East Parking Garage would have 365 parking spaces, for a total of 4,125 onsite parking spaces. Between 3,700 and 4,100 parking spaces would also be available in the HPSP area across the street from the Proposed Project for use during events at the proposed Arena. Additionally, the East Transportation Hub would accommodate private and charter buses, taxis, and rideshare pickup/drop-off. The Proposed Project also incorporates a shuttle to provide connections between rail stations and the Project Site.

As discussed on page 3.14-101 of the Draft EIR, the supply of parking in the three parking garages and at Hollywood Park and the Hollywood Park Casino is more than adequate to accommodate attendee and employee parking demands during major events at the Proposed Project (so long as an overlapping event at

the NFL Stadium is not occurring). Parking on adjacent neighborhood streets would primarily be due to attendees searching for free and/or closer parking, and not the result of inadequate overall off-street supply.

The comment expresses concern that traffic generated by the Proposed Project may result in parking or other problems in nearby residential neighborhoods. The Draft EIR included an analysis of, and mitigation for, this potential impact. The Event TMP, included in Draft EIR, Appendix K.4, requires the Arena operator to develop and implement a Neighborhood Traffic Management Plan (NTMP). The EIR identifies the performance standards that must be achieved in order to protect nearby residential neighborhoods from the impacts of traffic intrusion (see Draft EIR, pages 3.14-237 – 3.14-240). In addition, the City approved at its first reading (May 5, 2020) a Citywide Permit Parking Districts Program. The intent of the system is to protect street parking throughout the City from potential encroachment by patrons attending events at the NFL Stadium, to give local residents priority for on-street parking in residential areas, and to alleviate traffic increases in residential neighborhoods. The program will replace the City's existing Permit Parking Program. The City's new Citywide Permit Parking Districts Program includes the streets surrounding the Project Site in a new Permit Parking District 8, and specifies that the permit parking restrictions in this district will be activated immediately once adopted by City Council and signs are installed. The program would be continuously in force. It is anticipated that the Citywide program will be adopted and these restrictions implemented before the opening of the Proposed Project. This program would reduce the impact of Proposed Project-related traffic and parking in surrounding neighborhoods.

**Comment [U11]:** Update to reflect final passage.

The comment expresses concern regarding impacts caused by transportation network companies (TNCs), such as Uber and Lyft. The EIR includes analysis of transportation impacts that may occur as a result of the use of TNCs by patrons of the arena. This information appears throughout the chapter addressing transportation (Draft EIR, Section 3.14, Transportation and Circulation). For additional information, please see Response to Comment Sambrano-17.

Sambrano-10 The Proposed Project would be privately funded by the project applicant. A development agreement entered into between the City and the project applicant would outline the exact financial obligations the project applicant would contribute through development fees. Similarly, the development agreement would outline the terms for well relocation funding. Please see Response to Comment Sambrano-14.

**Comment [U12]:** Global review for capitalization and also references to "draft" etc. for consistency.

Sambrano-11 This comment expresses opposition to the Proposed Project, and raises questions about the veracity of the information in the Draft EIR. The Draft EIR

prepared for the Proposed Project is an objective, accurate, and complete analysis of the potential environmental impacts that would or could result from construction and operation of the Proposed Project. Pursuant to CEQA requirements as set forth in the CEQA Guidelines, each environmental resource topic subject to analysis under CEQA has been given careful consideration in light of existing and anticipated future environmental conditions, applicable regulations, the physical and operational characteristics of the Proposed Project. As required under CEQA, where significant impacts are identified, the Draft EIR describes potentially feasible mitigation measures which could be adopted to substantially lessen or avoid such impacts. In addition, a range of reasonable alternatives are presented and comparatively evaluated in the Draft EIR. If the City Council ultimately determines to approve the Proposed Project, it will be required to explain the reasons that it considers the significant impacts of the Proposed Project acceptable in a Statement of Overriding Considerations, which must be based on substantial evidence in the administrative record. Please see Response to Comment NRDC-3. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Sambrano-12 Table 3.12-4 on page 3.12-6 of the Draft EIR provides an estimate of existing employment under the current land uses on the Project Site. The estimates of anticipated employment on the Project Site, including the estimated 2.24-employees-per-1,000-square-foot estimated for the Church's Chicken Franchise on West Century Boulevard and Prairie Avenue, were based on the employee generation rates documented in the Commercial/Industrial Development School Fee Justification Study prepared for the Inglewood Unified School District in May, 2018. The purpose of the study (as stated on page ES-1 of the study) was to analyze the extent to which a nexus can be established in the Inglewood Unified School District between categories of commercial/industrial development and (i) the need for school facilities, (ii) the cost of school facilities, and (iii) the amount of statutory school fees per square foot that may be levied for schools pursuant to the provisions of Assembly Bill 181, California Government Code section 66001, and California Education Code section 17621 (e).

The comment discusses anticipated spending power of part-time event employees. Issues related to the income of Proposed Project employees are economic and/or social in nature. There is no evidence in the comment nor conclusions based on evidence that connect the comment to environmental issues. CEQA Guidelines section 15131 provides that a lead agency include or present economic or social information in an EIR, in any form it desires. CEQA Guidelines section 15131 establishes that "[e]conomic or social effects of a project shall not be treated as significant effects on the environment." It also prescribes how social and economic information may be used in a CEQA

document, stating that economic or social effects may be used to “trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused the economic or social changes,” “to determine the significance of physical changes caused by the project,” and “together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR.” CEQA Guidelines section 15131(a) provides that “[t]he intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.”

Sambrano-13 Impact 3.12-2 analyzes the potential for construction and operation of the Proposed Project to displace substantial number of existing people or housing units necessitating the construction of replacement housing elsewhere. The discussion of Impact 3.12-2 on page 3.12-15 states that “[t]he Project Site does not contain any residential or dwelling units, and therefore has no existing permanent resident population. For this reason, no residents would be directly displaced as a result of the Proposed Project.”

The comment implies that the Rodeway Inn & Suites provides an apartment for its on-site residential motel manager and suggests that the family would be displaced by the Proposed Project. The commenter’s relationship to the Rodeway Inn & Suites is unknown, so the comment’s implication that a family lives there may not be correct. Rodeway Inn & Suites submitted a letter commenting on the Draft EIR. The letter acknowledged that the Proposed Project would require demolition of the motel and stated that the motel was “generally supportive” of the Proposed Project. The letter does not state that the motel manager and family live on the site (see Comment Letter Rodeway).

Under the assumption that the comment’s implication is true, the City offers the following response. The motel is a commercial use, rather than a residential use. The City considers the motel a place of employment and not a permanent residence. The motel manager’s use of the motel apartment, if true, is part of the compensation and a requirement of the position. As such, while the outcome of demolition of the Rodeway Inn & Suites would be that the on-site manager would be required to vacate prior to demolition, the City does not consider such an outcome to be displacement of a resident or demolition of a residential unit. Even if the outcome were considered a displacement of a resident or demolition of a residential unit, that would not result in the displacement of a “substantial number” of residents or housing units. For both reasons, and each of them, the displacement of the manager from the motel is not considered a “significant impact.” No mitigation measures are required.

The Draft EIR states: “The Project Site does not contain any residential or dwelling units within the site’s boundaries, and therefore has no permanent resident population.” (page 3.12-5.) This statement is correct, considering the zoning and uses at the motel site. In addition, at the time the Draft EIR was prepared, the City did not know, and had no basis for knowing, that the motel manager was provided an apartment within the motel. Given the comment’s assertion that the manager has an apartment on the site, page 3.12-5, the second paragraph is revised to read:

The Project Site is mostly vacant, and is partially developed with a fast-food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, a commercial catering business, and a groundwater well. The Project Site does not contain any residential or dwelling units within the site’s boundaries, and therefore has no permanent resident population. The City received an unsubstantiated comment letter implying that the motel’s manager resides in an apartment within the motel. If this statement is true, then the manager would be displaced at the time the motel is demolished. The motel use, however, is commercial rather than residential in character, and the availability of an apartment for the manager is not considered a permanent residence. In addition, the displacement of the manager from this apartment, should it occur, is not considered substantial. Existing employment at the Project Site is estimated to be approximately 119 people, as estimated below in Table 3.12.4.

In addition, the Draft EIR at page 3.12-15, the first paragraph under Impact 3.12-2 is revised to read:

The Project Site is currently developed with a fast-food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, a commercial catering business, and a groundwater well and related facilities. The Project Site does not contain any residential or dwelling units, and therefore has no existing permanent resident population. For this reason, no residents would be directly displaced as a result of the Proposed Project. The City received an unsubstantiated comment letter implying that the motel’s manager and family reside in an apartment within the motel. If this statement is true, then the manager would be displaced at the time the motel is demolished. The motel use, however, is commercial rather than residential in character, and the availability of an apartment for the manager is not considered a permanent residence. In addition, the displacement of the manager from this apartment, should it occur, is considered not substantial, and therefore this impact would be **less than significant.**



Sambrano-14 As stated on page 2-4 of the Draft EIR, the Proposed Project constitutes a Public/Private partnership between Murphy's Bowl LLC and the City as the Proposed Project would involve the disposition of property owned by the City of Inglewood and the City of Inglewood as Successor Agency to the City Inglewood Redevelopment Agency, the vacation of portions of City-owned streets, potential condemnation actions to acquire privately owned, nonresidential parcels as well as acquisition of public and potential acquisition of privately-owned parcels, by the project applicant for the development of the Proposed Project. City Objectives 8 and 9 both call for the construction of the Proposed Project "with private funds." Also, as stated on page 2-5 of the Draft EIR, the project applicant's stated objectives for the Proposed Project include an objective to develop a financially viable public/private Project that is constructed and operated from private funding sources.

The funding of the construction and operation of the Proposed Project is an economic issue and under CEQA is not relevant to the disclosure of the adverse physical environmental impacts of the Proposed Project (please also see Response to Comment NRDC-3). Thus, the Draft EIR does not describe or otherwise address the funding or financing of the Proposed Project. That these issues are not addressed in the EIR does not mean that they are irrelevant or unimportant; rather, it means that CEQA does not require these issues to be addressed in the EIR. Financial issues are relevant to the City's decision-making process. Notably, the City and the project applicant have engaged in discussions regarding the terms of a proposed Development Agreement for the Proposed Project; a draft of this agreement provides that no public funds would be expended in the construction or operation of the Proposed Project. This would include site acquisition costs where the project applicant would be obligated to fully recompense the City for (1) funds previously expended in the acquisition of the currently publicly owned portions of the Project Site, and (2) any or other resources expended by the City as part of the exercise of eminent domain.

In addition, the project applicant and the City have negotiated a "public benefits" package of \$100 million. If the Proposed Project is approved by the City Council, these benefits would include up to \$80 million in programs for the construction of affordable housing and assistance for first-time homebuyers and renters; the balance of \$20 million would fund programs for students, families and seniors. The elements of this package would be part of the entitlement package presented to the City Council for its consideration. This package, along with the proposed Development Agreement, would be made available for public review prior to its consideration by the City Council, pursuant to the requirements of the California Government Code.

The comment refers to previous acquisition of residential properties at the Project Site. As the Draft EIR notes, “[p]roximity to nearby airports, especially LAX, has affected development on the Project Site. [¶] ... Beginning in the mid-1980s, the FAA has issued noise grants to the City of Inglewood as part of the LAX Noise Control/Land Use Compatibility Program, with the objective of recycling incompatible land uses to land uses that are compatible with the noise levels of airport operations. Under that program, the FAA and the City of Inglewood approved the acquisition of a number of parcels on the Project Site. In compliance with FAA grant agreements, the City is obligated to dispose of the land at fair market value, and ensure that the land is used for purposes that are compatible with specified airport noise levels of operation of the airport.” (pages 3.10-4 – 3.10-5.) The Proposed Project is designed to be consistent with these obligations and restrictions on the use of the site.

The comment refers to other, unspecified planning efforts and other actions that do not appear to be pertinent to the Proposed Project, and the comment does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Sambrano-15 The transportation analysis in the Draft EIR used a variety of sources to support the technical analysis. Southern California Association of Governments’ (SCAG) travel demand model was used to identify freeway segment volumes that did not have quality Caltrans’ Performance Measurement System (PeMS) data available or PeMS monitoring locations. Trip distribution for ancillary land uses was developed using data from SCAG travel demand model, and trip length data from SCAG was used. Additional data was used to assess existing conditions and Proposed Project future traffic conditions throughout the study area, including west of the I-405 freeway. Caltrans was consulted, and concurred with the data and methodology used to conduct the analysis.

Sambrano-16 Draft EIR, Section 3.14, Transportation and Circulation, provides 516 pages of analysis, disclosing potential impacts on the roadway, pedestrian, and bicycle networks for a variety of scenarios including overlapping events held at the Proposed Project, NFL Stadium, and The Forum. Additional information appears in Draft EIR, Appendix K, which includes 14,000+ pages of supporting data and analysis. As explained on pages 3.14-1 and -2, the transportation and circulation analysis evaluates a total of 114 study intersections and 28 neighborhood street segments within an approximately 20-square-mile study area, including the corridors connecting to the major freeways that would provide regional access to the Proposed Project. The study area extends generally westerly to the I-405, southerly to the I-105, easterly to the I-110, and northerly to Centinela Avenue and Florence Avenue and several outlying

intersections further north. The transportation analysis also evaluates 53 discrete freeway components, including mainline and collector/distributor segments, weave areas, and ramp merge/diverge areas. The analysis also included vehicular queuing at the ten freeway off-ramps anticipated to be used to a significant degree by Proposed Project trips. For those impacts that are identified as significant, mitigation measures are provided to reduce the impact. The Draft EIR acknowledges that the Proposed Project would result in certain significant and unavoidable transportation impacts.

Sambrano-17 The intention of the East Parking Transportation Hub is to explicitly direct transportation network company operators (TNCs) such as Lyft and Uber to a specific area for passenger dropoff and pickup. As discussed in Draft EIR, Section 3.14, Transportation and Circulation, page 3.14-103, “it is expected that some attendees traveling to the venue via a TNC would request to be dropped off near the plaza, versus in the designated East Parking Transportation Hub, or would exit their vehicle at other locations along the curb once the vehicle encounters heavy congestion. For analysis purposes, it is assumed that one-third of pre-event peak hour TNC drop-offs occur along a public street curb (i.e., along South Prairie Avenue or West Century Boulevard) while two-thirds (i.e., most traveling from the east) are dropped off in the East Transportation Hub. This approach is consistent with observations from other urban arenas, in which TNC drop-offs tend to occur adjacent to the venue unless precluded by physical barriers and/or enforcement. For post-event conditions, the arena is assumed to be placed within a ‘geofenced area’ in which attendees requesting a TNC are directed to meet the vehicle at the East Parking Garage. Thus, all post-event TNC pick-up activity would occur in this garage (or at a location further from the Proposed Project that would require a longer walk). The use of a geofence has been shown to be an effective means of controlling the location where TNC pick-ups can occur; for example, a geofence is used at the LAX central terminal and at numerous other sporting/entertainment centers (e.g., Seattle Center, Levi’s Stadium, etc.).”

As part of the Event TMP outlined in Mitigation Measure 3.14-2(a), the Arena shall be geofenced and attendees requesting a TNC are directed to meet the TNC vehicle at the East Parking Garage. As described on page 3.14-195, Mitigation Measure 3.14-2(2)(h) also explains that if monitoring shows that ride hailing vehicles are using travel lanes or curbs along the Proposed Project frontage to drop off passengers during the pre-event period, then TCOs and/or barricades shall be stationed at locations where unauthorized drop-offs are occurring.

Additionally, Mitigation Measure 3.14-2(a)(i) requires that the TMP reduce traffic volumes on local and collector street segments identified in the Draft EIR

as having a significant impact without causing a significant impact on other local and collector street segments. The measure must also discourage and reduce event-related cut-through traffic while maintaining access for residents and their guests.

Draft EIR, Appendix K.4 is a draft Event Transportation Management Plan. Section 8 of the Event TMP addresses the protection of neighborhood streets from the intrusion of traffic related to events at the Arena. For additional information, please see Response to Comment Sambrano-9.

Sambrano-18 The comment suggests that the Draft EIR did not include sufficient analysis of the potential for urban decay, or did not use appropriate means for determining whether urban decay would occur. Draft EIR, Chapter 4, Other CEQA-Required Considerations, Section 4.5, Urban Decay of the Draft EIR analyzes the potential for the Proposed Project to result in urban decay effects related to the addition of a sports and entertainment arena and commercial space to the market areas for both types of uses. The analysis of potential urban decay effects utilized a detailed study, conducted by Stone Planning LLC (included in Draft EIR, Appendix R) to evaluate the potential economic impacts of addition of a new arena and commercial space to the existing markets for arena events and commercial space. The urban decay analysis in Draft EIR, Chapter 4, Other CEQA-Required Considerations, Section 4.5, Urban Decay, made no distinction of quality or a lack of quality in regards to existing homes or businesses within the markets that would be subject to the economic effects of the Proposed Project.

The comment also suggests that the Draft EIR supports the development of the Project Site and the surrounding areas for uses related to professional sports. CEQA Guidelines section 15121 subpart (a) clarifies the role of the EIR in the City Council's process of approving a proposed project, stating:

*An EIR is an information document which will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.*

As stated above, the Draft EIR is an informational document and does not advocate for or against the Proposed Project.

Sambrano-19 This comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Sambrano-20 As indicated in Draft EIR, Section 3.3, Biological Resources, page 3.3-7, a tree inventory was completed for the Project Site and included in Draft EIR, Appendix E. The construction of the Proposed Project would require the removal of 97 trees on and around the Project Site, 72 of which are protected trees. As indicated in Draft EIR, Section 3.3, Biological Resources, page 3.3-14. There are 77 trees on the Arena Site, four trees on the West Parking Garage Site, nine trees on the East Transportation and Hotel Site, and seven trees on the Well Relocation Site, for a total of 97 trees. The protected trees would be replaced at a 1:1 ratio in accordance with City of Inglewood Tree Preservation Ordinance (Inglewood Municipal Code Chapter 12, Article 32). Thus the benefits to air pollution gained from trees would be reestablished.

Sambrano-21 As described in Draft EIR, Section 3.9, Hydrology and Water Quality, the Project Site is currently made up of approximately 15 percent impervious surfaces and 85 percent pervious surfaces. However, as detailed in Draft EIR, Section 3.9, Hydrology and Water Quality, Subsection 3.9.1, Environmental Setting, preliminary investigations of the Project Site indicate that the site's native soil characteristics have poor drainage with a low infiltration rate.<sup>15</sup> As described in Impact 3.9-2 beginning on page 3.9-24 of the Draft EIR, "the Proposed Project would include biofiltration planters and biofiltration systems, which can be effectively designed in low permeable soil conditions, to treat stormwater. Runoff would be directed from drainage areas to on-site biofiltration planters and bio-swales. The biofiltration systems would be designed to capture site runoff from roof drains, treat the runoff through biological reactions within the planter soil media, and discharge at a rate intended to replicate pre-developed conditions or better."

Draft EIR, Section 3.6, Geology and Soils, page 3.6-6, describes the presence of oil fields in proximity to the Project Site:

According to the California Division of Gas and Geothermal Resources (DOGGR), the Project Site is not located within the limits of any existing or former oil fields.<sup>11</sup> The Project Site does not contain existing oil production wells, and no plugged or abandoned oil exploration wells are known to be located at the Project Site. The closest known oil production well is located approximately 1,200 feet northeast of the Arena Site and is categorized as "idle." Therefore, while there is some history of oil extraction in the area, as indicated by a cluster of wells located over a half mile to the northeast, no oil extraction occurs or is known to have historically occurred at the Project Site.

<sup>15</sup> AECOM, 2018. *Inglewood Basketball & Entertainment Center Project Low Impact Development (LID) Report*. August 23, 2018. p. 2.

(Footnote 11: California Division of Gas and Geothermal Resources (DOGGR), Well Finder, <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.32073/33.94064/15>. Accessed January 28, 2019.)

Therefore, there would be no effect of the Proposed Project on oil wells.

The discussion on page 3.6-21 of the Draft EIR explains why the Proposed Project would not cause potential substantial adverse effects as a result of an earthquake:

**The Proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (No Impact)**

No known active, sufficiently active, or well-defined faults have been recognized as crossing or being immediately adjacent to the Project Site.<sup>62,63</sup> CGS does not delineate any part of the Project Site as being within an Alquist-Priolo Earthquake Fault Zone. The Alquist-Priolo Earthquake Fault Zone closest to the Project Site is the Newport-Inglewood Fault, located approximately 1.13 miles to the northwest.<sup>64</sup> Since there are no active faults on or adjacent to the Project Site, the Proposed Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the California State Geologist for the area. Further, there is no evidence that development of the Proposed Project would increase the frequency or effects of seismic activity in the area. Thus, there would be **no project-level or cumulative impacts** of the Proposed Project related to this significance criterion.

(Footnote 62: A sufficiently active fault is “one that has evidence of Holocene surface displacement along one or more of its segments or branches.”)

(Footnote 63: AECOM, 2018. *Preliminary Geotechnical Report*, September 14, 2018. p. 16.)

(Footnote 64: AECOM, 2018. *Preliminary Geotechnical Report*, September 14, 2018. p. 16.)

- Sambrano-22 This comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.
- Sambrano-23 This comment states that only 3 of 25 volumes of the Draft EIR were sent to the public libraries. The City of Inglewood Main Library was provided a full set of the Draft EIR (i.e., a total of 32 volumes) and the Inglewood Crenshaw-Imperial Branch Library was provided two volumes which included the Draft EIR

analysis and one volume which included an abbreviated appendix and electronic copies of the appendices on the flash/thumb drive for a total of three volumes. Therefore, the commenter incorrectly states that only 3 of the 25 volumes of the Draft EIR were sent to the public libraries as the Draft EIR chapters were provided to both libraries in hard copy form; the appendices were also provided in hard copy form as well as on a flash/thumb drive. All three locations also provided online access to the complete Draft EIR, including all technical appendices.

Sambrano-24 This concluding comment raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Sambrano-25 This comment refers to the lack of medical hospital issues. It does not specify what issues may arise as a result of the Proposed Project, or what the concern is. However, emergency access is discussed in Impact 3.14-14 beginning on page 3.14-249 of the Draft EIR. The analysis concluded that the Proposed Project could have a potentially significant impact on emergency access. Mitigation Measure 3.14-14 requires that the project applicant work with the City and the Centinela Hospital Medical Center to develop and implement a Local Hospital Access Plan that would maintain reasonable access to the hospital by emergency and private vehicles accessing the Centinela Hospital Medical Center emergency room. A draft of this plan is included in section 10 of the Event TMP in Draft EIR, Appendix K.4. Implementation of this measure would reduce the impact to less than significant. Please also see Response to Comments Channel-38 and Channel-39.

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Letter Samuel-Polk (page 1 of 1)

**Letter**      **Catherine Samuel-Polk**  
**Samuel-**      **April 10, 2020**  
**Polk**  
**Response**

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Samuel-Polk-1    This comment expresses support for the Proposed Project, and raises neither significant environmental issues nor specific questions about the analyses or information in the Draft EIR that would require response pursuant to CEQA Guidelines section 15088. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.

Letter Butts2 (1 of 1)

**Letter**            **James T. Butts**  
**Butts2**            April 2, 2020  
**Response**

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Butts2-1            This comment refers to a previous comment letter submitted on the Draft EIR (please see Butts1). The comment clarifies that the support expressed in Comment Letter Butts1 referred to his observations of the City’s environmental review process for the Proposed Project, including the level of detailed content in the Draft EIR, the broad and comprehensive public distribution of the documents, and the teamwork undertaken by City staff in the execution of the environmental review process. The comment further indicates that the comments were made from the commenter’s personal point of view as a resident of the City of Inglewood, and that they do not represent his official opinion as an elected policy-maker in the City on the adequacy of the Final EIR or the merits of the Proposed Project. The comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.