CHAPTER 3
Comments and Responses

3.1 Introduction

This chapter of the Final EIR contains the comment letters that the City received on the Draft EIR. The letters and responses are organized by federal agencies, State agencies, local agencies, tribal entities, organizations, and individuals. Following each comment letter is a response by the City that supplements, clarifies, or amends information provided in the Draft EIR, that refers the reader to the appropriate place in the document where the requested information can be found, or that otherwise responds to the comment. Comments that are not directly related to environmental issues may be discussed or noted for the record. Where text changes in the Draft EIR are warranted based upon comments on the Draft EIR, those changes are included following the response to comment; changes to the text of the Draft EIR are also shown in Chapter 2, Revisions to the Draft EIR, where all the text changes can be found.

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Letter FAA (1 of 3)

Letter FAA (2 of 3)

Letter FAA (3 of 3)

Letter FAA	**Keith Lusk, Federal Aviation Administration (FAA)**
Response	January 3, 2020

FAA-1 Letter FAA is an email that includes a chain of emails. This comment refers to a comment later in the email chain. Please see Response to Comment FAA-2.

FAA-2 Draft EIR, Section 3.8, Hazards and Hazardous Materials, analyzes potential aircraft hazards and describes the Federal Aviation Administration (FAA) form 7460 requirements and process that would be carried out for the Proposed Project (see Drat EIR, pages 3.8-22 to 3.8-23 and 3.8-45 to 3.8-47, and Mitigation Measure 3.8-5 on page 3.8-48). Additionally, Drat EIR, Chapter 2, Project Description, Subsection 2.6, Actions, pages 2-88 to 2-90, describes the FAA review of the Proposed Project that would be required under 14 Code of Federal Regulations Part 77.

The project applicant has already initiated communication with the FAA and filed Form 7460-1 *Notice of Proposed Construction or Alteration* for all of the proposed structure through the FAA Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) filing process. On October 2, 2019 and October 22, 2019, the FAA issued Determinations of No Hazard to Air Navigation for the plaza structures, including the sign tower and ancillary buildings, the parking structures, and the hotel. The project applicant must complete the OE/AAA process for all components of the Proposed Project prior to start of construction. Please also see Response to Comment ALUC-2.

FAA-3 This comment includes internal communications related to the FAA's review of the Draft EIR, but 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 Caltrans (1 of 4)

Letter Caltrans (2 of 4)

Letter Caltrans (3 of 4)

Letter Caltrans (4 of 4)

Letter	**Miya Edmonson, State of California – Department of Transportation (Caltrans)**
Caltrans Response	March 24, 2020

Caltrans-1 This comment is introductory correspondence from Caltrans to the City. This comment provides an accurate summary of the Proposed Project's components. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments Caltrans-3 through Caltrans-19.

Caltrans-2 This comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments Caltrans-3 through Caltrans-19.

Caltrans-3 The comment provides a summary of the dates in which Caltrans commented on the Notice of Preparation (NOP) and when consultation meetings between Caltrans and the City occurred. The comment's summary is accurate. These efforts were supplemented by a number of informal contacts between the City and Caltrans throughout the preparation of the Draft and Final EIRs. The City appreciates the availability of Caltrans staff, and Caltrans' participation in this consultation process.

Caltrans-4 The comment confirms the consultation with Caltrans establishing the analysis segments and interchanges along the Interstate 105 (I-105), Interstate 110 (I-110), and Interstate 405 (I-405) freeways to be analyzed in the Draft EIR. In fact, four additional freeway interchanges were analyzed in the Draft EIR beyond those identified by Caltrans in its letter dated April 19, 2019.

Caltrans-5 The comment correctly notes that the Draft EIR identified significant cumulative impacts on State facilities, including the I-405 freeway. The Draft EIR identified a physical mitigation measure at the I-405 northbound off-ramp to Century Boulevard (Mitigation Measure 3.14-3(c) on Draft EIR page 3.14-211) and traffic signal coordination/optimization at the I-405 southbound off-ramps to Century Boulevard (Mitigation Measure 3.14-3(o) on page 3.14-216 of the Draft EIR) but did not identify a mitigation measure for impacts along the I-405 mainline components.

As mitigation for the significant cumulative impacts on the I-405 freeway, based on further consultations with Caltrans, the following mitigation measure is added to the Draft EIR following Mitigation Measure 3.14-24(g) on page 3.14-294:

> **Mitigation Measure 3.14-24(h)**
>
> *The project applicant shall provide a one-time contribution of $1,524,900 to Caltrans which represents a fair share contribution of*

funds towards Caltrans' I-405 Active Traffic Management (ATM)/Corridor Management (CM) project.

According to the Caltrans Project Initiation Report,[1] the ATM/CM project proposes to add ATM and CM strategies such as queue warning, speed harmonization, dynamic corridor adaptive ramp metering, traveler information, and others on I-405 from Rosecrans Avenue to SR 90. This project also proposes to upgrade transportation management system (TMS) elements including the existing closed circuit television cameras, changeable message signs, vehicle detection stations, and ramp metering systems within the project limits. The purpose of the Proposed Project is to maximize corridor wide system performance and make full use of the freeway system capacity by deploying ATM strategies and upgrading the existing TMS with life cycle replacements for the TMS field elements to ensure the corridor is in operational and monitoring condition. Through consultations with Caltrans, the City and Caltrans have mutually determined that a one-time contribution of $1,524,900 represents the appropriate fair-share contribution to this project, based on the Proposed Project's contribution to cumulative traffic along the I-405 corridor. That is because the Proposed Project would not cause, but would contribute, to existing and projected congestion along this corridor; Caltrans has an existing, adopted project to improve this corridor's performance and thereby alleviate this congestion; and it is appropriate to require the Proposed Project to contribute to this project in proportion to the amount of I-405 traffic that it would contribute to this corridor. The technical memorandum entitled *IBEC Contribution to Caltrans' I-405/ATM/CM Project*[2] presents the calculations used to determine the fair share contribution of $1,524,900. This approach is consistent with CEQA Guidelines section 15130(a)(3). As an explanation of the Level of Significance After Mitigation, the last sentence in the fifth paragraph on page 3.14-295 of the Drat EIR, is revised as follows:

> The freeway component impacts are considered **significant and unavoidable** because implementation of Mitigation Measures 3.14-24(g) and 3.14-24(h) would not guarantee that operations at each impacted component would be restored to 'no project' levels.

Caltrans-6 The impacts on I-405 weaving/merging mainline segments presented in the referenced tables would be addressed as part of the Proposed Project's fair share contribution to the I-405 ATM/CM project discussed in the Response to Comment Caltrans-5. Please see the Response to Comment Caltrans-5.

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1 California Department of Transportation, *Project Initiation Report to Request Programming in the 2020 SHOPP in Los Aneles County at Various Locations*, approved June 26, 2019.

2 Fehr & Peers, *Technical Memorandum, IBEC Contribution to Caltrans' I-405 ATM/CM Project*, May 7, 2020.

Caltrans-7 The I-405 northbound off-ramp approach to its intersection with West Century Boulevard currently provides two left-turn lanes and one right-turn lane. Implementation of Mitigation Measure 3.14-3(c) would require restriping of the center lane to permit both left- and right-turn movements from the center lane. The intent is to provide for greater flexibility in the use of the center lane, given that left-turning volumes [e.g., towards the Los Angeles International Airport (LAX)] are higher during typical peak hours but right-turning volumes (e.g., towards the Proposed Project) are projected to be higher in pre-event hours prior to major events at the Proposed Project. The concern expressed in the comment is whether this mitigation measure could lengthen queues for left-turning traffic on the off-ramp to such an extent that it would lead to a secondary significant impact.

The effect of the mitigation measure on off-ramp queuing during the pre-event hour is discussed on page 3.14-243 of the Draft EIR, where it is stated that the maximum vehicle queue on the off-ramp would be reduced from an estimated 4,075 feet with Proposed Project traffic without mitigation to 2,325 feet with Proposed Project with mitigation, which is less than the applicable 3,600-foot storage threshold.

The following discussion provides additional information regarding the potential effect of the mitigation measure during typical weekday AM and PM peak hours. The table below presents the estimated 95th percentile queues at the northbound off-ramp for the AM and PM peak hours with and without the proposed mitigation measure for the Ancillary Land Uses scenario and the Daytime Event scenario.

FREEWAY OFF-RAMP QUEUING ANALYSIS
I 405 NB OFF-RAMP AT WEST CENTURY BOULEVARD, AM AND PM PEAK HOURS

Scenario	Ramp Capacity Threshold[1]	No Project			Plus Project			Plus Project with Mitigation		
		95th Percentile Queue (ft.)[2]		Queue Exceeds Available Storage[3]	95th Percentile Queue (ft.)[2]		Queue Exceeds Available Storage[3]	95th Percentile Queue (ft.)[2]		Queue Exceeds Available Storage[3]
		AM Peak Hour	PM Peak Hour		AM Peak Hour	PM Peak Hour		AM Peak Hour	PM Peak Hour	
Adjusted Baseline (Ancillary Land Uses)	3,600	1,944	1,049	No	1,963	1,062	No	2,127	1,107	No
Adjusted Baseline (Daytime Event)	3,600	1,944	1,049	No	2,134	1,067	No	2,314	1,111	No
Cumulative (Ancillary Land Uses)	3,600	2,275	1,371	No	2,291	1,384	No	2,477	1,491	No
Cumulative (Daytime Event)	3,600	2,275	1,371	No	2,477	1,387	No	3,155	1,810	No

NOTES:
1 Per Caltrans letter dated April 22, 2019, ramp threshold is 85 percent of maximum ramp length (which is measured from the ramp terminus to freeway off-ramp gore point), unless an auxiliary lane is present. If an auxiliary lane is present, the ramp threshold is calculated by summing the total length of the ramp from the intersection to the gore point and the lesser of 1,000 feet or one half the length of the auxiliary lane. Storage capacity in additional turn lanes at the ramp termini intersection is also included.
2 95th percentile queue estimated using HCM methodologies (Synchro or SimTraffic). This queue length implies a 5 percent probability that the actual queue would be greater than this estimate, and is routinely used in infrastructure design. Values shown represent the total length of 95th percentile queues across all turn lanes on the off-ramp.
3 If the 95th percentile queue is greater than the ramp capacity threshold, then the queue exceeds the available storage.

SOURCE: Fehr & Peers, 2020.

As can be seen in the table above, the 95th percentile queue is estimated to increase slightly with the mitigation measure due to the higher volumes of left-turning vehicles relative to the right-turning vehicles during those hours. However, in no case is the queue estimated to exceed the available storage threshold. Therefore, the mitigation measure would not create new secondary impacts.

Caltrans-8 Please see Response to Comment Caltrans-7. Widening the off-ramp to add another right-turn lane would not be necessary given that the proposed mitigation measure would not lead to secondary impacts. Mitigation Measure 3.14-3(c) (see Draft EIR, page 3.14-211) specifies that implementation of the mitigation measure would require complying with the Caltrans project development process as a local agency-sponsored project. Conducting the Intersection Control Evaluation (ICE) screening would be part of the Caltrans project development process.

Caltrans-9 The comment correctly notes that the Draft EIR found significant impacts at the following three intersections but did not identify feasible mitigation measures at those locations:

- I-105 eastbound on-ramp & Imperial Highway
- I-105 eastbound on/off-ramps & 120th Street
- I-105 westbound off-ramp & Hawthorne Boulevard

The reasons for the finding of no feasible mitigation measures at these three locations are provided below.

I-105 Eastbound On-Ramp & Imperial Highway

This location was found to be impacted using the Caltrans-preferred Highway Capacity Manual methodologies only under concurrent event scenarios with The Forum, the NFL Stadium or the NFL Stadium and The Forum (weekday pre-event & post-event hours). Mitigation was found to be infeasible for the following reasons:

- The westbound Imperial Highway approach already allows right-turns into the high-occupancy vehicle (HOV) bypass lane on the on-ramp from the #3 through lane. Widening the westbound Imperial Highway approach to provide a second exclusive right-turn lane would create a trap situation for non-HOV right-turning movements.
- Limited right-of-way on the eastbound Imperial Highway approach means that a second left-turn lane cannot be added (76 feet curb-to-curb width with seven lanes - no room to add an eighth lane).
- The northbound Freeman Avenue approach is a small residential street (36 feet curb-to-curb); restriping to provide additional lanes would create a secondary impact related to loss of parking.

Wayfinding measures to direct motorists leaving an event to travel west on West Century Boulevard to south on Hawthorne Boulevard to the eastbound I-105 as an alternative to south on South Prairie Avenue to west on Imperial Highway to the eastbound I-105 could be built into the Event Transportation Management Plan and would not require Intelligent Transportation Systems (ITS) on local streets.

I-105 Eastbound On/Off-Ramps & 120th Street

This location was found to be impacted using the Caltrans-preferred Highway Capacity Manual methodologies under the Adjusted Baseline and Cumulative plus Daytime Events scenarios (PM peak hour) and under concurrent event scenarios with the NFL Stadium or the NFL Stadium & The Forum (weekday post-event hour) or the football game at the NFL Stadium & The Forum

(weekend pre-event hour), which would be infrequent occurrences. Mitigation was found to be infeasible for the following reasons:

- The westbound 120th Street approach already allows right-turns into the HOV bypass lane on the on-ramp from the shared through/right lane. Widening the westbound 120th Street approach to provide a second exclusive right-turn lane would require a taking from the Los Angeles County Metropolitan Transportation Authority (Metro) park-and-ride lot serving Green Line station and would create a trap situation for non-HOV right-turning movements who inadvertently find themselves in the lane.

- Adding a second left-turn lane on the eastbound 120th Street approach would create an undesirable offset (i.e., lateral transition within the intersection) between the #1 westbound through lane and the eastbound left-turn lanes. Furthermore, the length of the new #1 eastbound left-turn lane would be severely limited due to an inability to widen 120th Street to the west due to the Dominguez Channel and water well on the north side and the Hawthorne Airport on the south side.

- Furthermore, providing a second left-turn lane on the eastbound 120th Street approach may require that either the existing HOV bypass lane on the on-ramp be converted to mixed-flow or the new #1 eastbound left-turn lane be restricted to HOV only. The former is not recommended because it would disincentivize creation of carpools. The latter is not recommended because it would create a trap situation for non-HOV left-turning vehicles who inadvertently find themselves in the lane.

In addition to considering Caltrans' comments concerning this ramp, the City of Inglewood has engaged in informal consultations with the City of Hawthorne concerning this same location. During these consultations, the City of Hawthorne has requested that consideration be given to adding a second left-turn lane to the eastbound 120th Street approach at the intersection and has indicated that they believe that the second eastbound left-turn lane could potentially fit within the constraints of the existing pavement width. The City of Inglewood is amenable to this improvement subject to the following conditions:

- The improvement fits within the existing pavement width and does not require widening. As noted above, widening the existing pavement is constrained by the Dominguez Channel, water well, and Hawthorne Airport.

- The substandard lane widths and the offsets that this would require on 120th Street would be acceptable to both the City of Hawthorne and Caltrans.

- Caltrans agrees to either convert the existing HOV bypass lane on the on-ramp to a general purpose lane or restricts the new #1 eastbound left-turn lane to HOV-only, creating the trap-lane situation described above.

The City of Hawthorne has also indicated that, should the second eastbound left-turn lane prove to be infeasible in consultation with the City of Inglewood and

Caltrans, an alternative improvement could be to extend the length of the single existing eastbound left-turn lane, thus providing additional storage space for eastbound left-turning vehicles. The City of Inglewood is amenable to this improvement subject to the following conditions:

- The improvement fits within the existing pavement width and does not require widening.
- The substandard lane widths that this would require on 120th Street would be acceptable to both the City of Hawthorne and Caltrans.

Accordingly, this mitigation measure is added following Mitigation Measure 3.14-2(o) on page 3.14-200 of the Draft EIR:

> **Mitigation Measure 3.14-2(p)**
>
> *The project applicant shall work with the City of Inglewood, the City of Hawthorne, and Caltrans to investigate the feasibility of adding a second eastbound left-turn lane or extending the length of the single existing left-turn lane on 120th Street at the I-105 Eastbound On/Off Ramps within the existing pavement width and, if determined to be feasible within the existing pavement width, to implement the improvement.*

I-105 Westbound Off-Ramp & Hawthorne Boulevard

This location was found to be impacted using the Caltrans-preferred Highway Capacity Manual methodologies under the Cumulative plus Daytime Events scenario (PM peak hour) and under the concurrent event scenario with the NFL Stadium & The Forum (weekday pre-event and post-event hours), which would be an infrequent occurrence. Mitigation was found to be infeasible for the following reasons:

- The westbound off-ramp approach is currently configured with a shared center lane, allowing it to be used flexibly.
- The south Hawthorne Boulevard leg is on the bridge adjacent to (and over) the Metro Green Line station and the I-105 freeway, with bus pullouts on both sides of the bridge serving the Green Line station. There is insufficient room to add lanes on the overpass without interfering with the existing bus stops.
- Given the cumulative nature of the impact, the Proposed Project could potentially contribute a fair share to improvements to increase the storage capacity on the southbound Hawthorne Boulevard approach (e.g., relocate the stop limit line approximately 50 feet to the south, restripe to provide a fourth southbound through lane, and relocate the traffic signal controlling the southbound approach due to relocation of the stop limit line). However, Caltrans does not have a defined project to implement these improvements.

Because implementation of some of these measures would require approval from jurisdictions other than the City of Inglewood, the following is added after the first full paragraph on page 3.14-204 of the Draft EIR:

Since the feasibility of Mitigation Measure 3.14-2(p) is not presently known and its implementation requires approvals from other jurisdictions beyond the City of Inglewood, its implementation cannot be guaranteed and the impact is considered to be **significant and unavoidable**.

Caltrans-10 The comment specifically refers to proposed mitigation measures at the I-105 westbound off-ramp approach to South Prairie Avenue and the I-105 Westbound off-ramp to Crenshaw Boulevard. The mitigation measures as written in the Draft EIR at these locations (Mitigation Measure 3.14-2(g) on page 3.14-199 and Mitigation Measure 3.14-2(j) on page 3.14-200) specify that implementation of the mitigation measures would require complying with the Caltrans project development process as local agency-sponsored projects. Conducting the ICE screening at these locations would be part of the Caltrans project development process.

Caltrans-11 The City supports Caltrans' goals to reduce driving trips, reduce greenhouse gases, and encourage alternative modes of travel. Mitigation Measures 3.14-1(a) and 3.14-2(b) would require the Proposed Project to implement a comprehensive Transportation Demand Management Program (TDM Program) to reduce single-occupancy trips and use other modes besides automobile to travel to and from the Project Site, both for daytime and non-event employees and patrons and for event attendees and employees. The mitigation measures would require a series of strategies intended to encourage alternative modes of transportation, provide event-day dedicated shuttle services, encourage carpools and zero-emission vehicles, encourage active transportation, provide an employee vanpool program, provide a regional park-and-ride program, provide information services, reduce on-site parking demand, and provide event-day local microtransit service. The mitigation measures also would require ongoing monitoring and reporting of the TDM Program.

Caltrans-12 The City agrees with Caltrans' support for reducing the amount of parking whenever possible. The amount of parking to be provided on the Project Site has been kept to a minimum in order to encourage the use of modes of transit other than private vehicles. Although off-site parking would be available at the NFL Stadium in Hollywood Park when events are not occurring at the Stadium, it is expected that this minimum amount of Project Site parking would serve as an encouragement to use of alternative modes to travel to and from events at the Project Site.

Caltrans-13 Please see Response to Comment Caltrans-11.

Caltrans-14 The first portion of this comment restates information that is provided in the Draft EIR. In regards to the Vermont Corridor Bus Rapid Transit (BRT) project, this project is currently in planning stages at Metro. As noted in the comment, the Vermont BRT Corridor Technical Study-Final Report was issued in 2017. Subsequently, the Vermont Transit Corridor Rail Conversion/Feasibility Study was issued in February 2019. According to the Metro website, environmental review is anticipated to occur between 2019 and 2023, implementation of the BRT option is a Measure M-funded project with an opening date of 2028-2030, and any potential future conversion to rail is not currently anticipated until after fiscal year 2067.

As discussed in the Draft EIR, both the Proposed Project's Event Transportation Management Plan (TMP) (Mitigation Measure 3.14-2(a) starting on page 3.14-193 and Appendix K.4) and the Proposed Project's TDM Program (Mitigation Measure 3.14-1(a) starting on page 3.14-191 and Mitigation Measure 3.14-2(b) starting on page 3.14-195) would be dynamic documents that would be revised and refined over time. Given that implementation of the Vermont BRT project is not anticipated until at least 2028, it would not be considered as part of the transit strategies that would serve the Proposed Project upon its opening in 2024. If/when it would be implemented by Metro, the project applicant and the City could consider modification of the Proposed Project's TMP and TDM Program to provide connections to the Vermont BRT.

Caltrans-15 Regarding multimodal improvements to encourage active transportation modes and improve community health, the Proposed Project would include a series of improvements to enhance pedestrian safety, including a pedestrian bridge across Prairie Avenue, widening of the east crosswalk across West Century Boulevard at the South Prairie Avenue/West Century Boulevard intersection (Mitigation Measure 3.14-13 on page 3.14-248 of the Draft EIR), and provision of traffic control officers (TCOs) at numerous locations in the vicinity of the Project Site to manage the interaction of pedestrians and vehicles (part of the TMP required in Mitigation Measure 3.14-2(a) and further described in Draft EIR, Appendix K.4).

Caltrans-16 Both Prairie Avenue and Century Boulevard are major arterials in the City of Inglewood circulation system and the City does not have plans to narrow either facility. However, as discussed in Response to Comment Caltrans-15, the Proposed Project would include a series of improvements to enhance pedestrian safety, including a pedestrian bridge across South Prairie Avenue, widening of the east crosswalk across West Century Boulevard at the South Prairie Avenue/West Century Boulevard intersection, and provision of TCOs at numerous locations in the vicinity of the Project Site to manage the interaction of pedestrians and vehicles. The Proposed Project would also provide off-street

bicycle parking exceeding City of Inglewood Municipal Code requirements and could accommodate a bike valet service in the West Parking Garage should demands materialize.

Caltrans-17 Preparation of a detailed Construction Transportation Management Plan (CTMP) would be required under Mitigation Measure 3.14-15 (see Draft EIR, page 3.14-253). The CTMP would be intended to ensure that acceptable operating conditions on local roadways are maintained. The Draft EIR requires that the CTMP include, at a minimum, identification of haul routes and truck circulation patterns, not permitting trucks to travel on residential streets, time of day of arrival and departure of trucks, limitations on the size and type of trucks, provision of a staging area with a limitation on the number of trucks that can be waiting, not permitting trucks to park or stage on residential streets, preparation of worksite traffic control plan(s) for lane and/or sidewalk closures, identification of detour routes and signing plans for street/lane closures, provision of driveway access plan so that safe vehicular, pedestrian, and bicycle movements are maintained, maintaining safe and efficient access routes for emergency vehicles and transit, manual traffic control when necessary, provisions for pedestrian and bicycle safety, identification of locations for construction worker parking, not permitting construction worker parking on residential streets, strategies to reduce the proportion of employee and delivery trips made during weekday AM and PM peak hours, and strategies to be undertaken to reduce the adverse effects during events at The Forum or NFL Stadium of construction-related closures of travel lanes along the project frontage.

Caltrans-18 It is anticipated that the Proposed Project construction contractor would obtain the necessary permits for the transportation of heavy construction equipment and/or materials which require the use of oversized-transport vehicles on State highways. As noted in Response to Comment Caltrans-17, one of the items to be considered in the CTMP required in Mitigation Measure 3.14-15 is the time of day of arrival and departure of trucks.

Caltrans-19 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.

OPR Letter (page 1 of 1)

Letter OPR Response	**Scott Morgan, State of California – Governor's Office of Planning and Research (OPR)** March 27, 2020

OPR-1 This comment is correspondence from OPR to the City acknowledging that the Proposed Project complied with the State Clearinghouse review requirements for Draft EIRs, pursuant to CEQA. 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 SCAQMD1 (page 1 of 1)

Letter	**Alina Mullins, South Coast Air Quality Management District (SCAQMD)**
SCAQMD1	
Response	January 2, 2020

SCAQMD1-1 This comment is introductory correspondence from South Coast Air Quality Management District (SCAQMD) to the City. This comment acknowledges SCAQMD's review of the Draft EIR, and reflects the initial comment period which ran for 45 days from December 27, 2019 through February 10, 2020. The comment period was subsequently extended and formally noticed three times by the City, and ultimately concluded after a total of 89 days on March 24, 2020.

SCAQMD1-2 Draft EIR, Appendix D, provided several modeling output data sets and worksheets including printed copies of the California Emissions Estimator Model software (CalEEMod), AMS/EPS Regulatory Model (AERMOD), California Line Source Dispersion Model (CALINE4), and Health Risk Assessment model output files produced in the evaluation of the Proposed Project. The Benefits Mapping and Analysis Program—Community Edition (BenMAP-CE) Modeling technical report with supporting model output files was also included. The Community Multiscale Air Quality (CMAQ) Photochemical Modeling Study technical report was included and consisted a list of electronic modeling files. Pursuant to the SCAQMD's request, the City provided live modeling files that were used to generate the output files. An electronic copy of the live modeling files that were used to quantify the air quality impacts, including the health risk assessment, from construction and operations of the Proposed Project was provided on a USB flash drive to the SCAQMD on January 2, 2020. Confirmation of receipt at the SCAQMD was provided on January 3, 2020.

Letter SCAQMD2 (1 of 2)

Letter SCAQMD2 (page 2 of 2)

Letter	**Alina Mullins, South Coast Air Quality Management District (SCAQMD)**
SCAQMD2	
Response	January 8, 2020

SCAQMD2-1 In order to expedite delivery of the Carbon Monoxide (CO) Hotspot files requested by the commenter, an electronic copy of the CO Hotspot emission calculation spreadsheets was emailed to Alina Mullins on January 9, 2020. Due to the size of the files, the spreadsheets were emailed in six separate emails. Ms. Mullins confirmed receipt of all six emails on January 9, 2020.

After further discussions with the City following the submission of this comment letter, the SCAQMD determined that the CMAQ input files were not required for its review. During a meeting on January 22, 2020, SCAQMD orally conveyed to the City that they had all of the technical information necessary to comprehensively review the Draft EIR, and no further technical information was needed.

SCAQMD2-2 Please see Response to Comment SCAQMD1-2.

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Letter LACDPW1 (1 of 5)

Letter LACDPW1 (2 of 5)

Letter LACDPW1 (3 of 5)

Letter LACDPW1 (4 of 5)

Letter LACDPW1 (5 of 5)

Letter	**Toan Duong, Los Angeles County Department of Public Works**
LACDPW1	**(LACDPW)**
Response	February 6, 2020

LACDPW1-1 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 LACDPW1-2 through LACDPW1-11, below.

LACDPW1-2 A meeting was held with representatives of the Los Angeles County Department of Public Works on April 12, 2018, at the outset of the EIR preparation process and this input was not provided at that time. However, the County's proposed installation of leading pedestrian intervals at the intersections of Century Boulevard/Van Ness Avenue and Normandie Avenue/Century Boulevard, and its potential installation of leading pedestrian intervals at the intersections of Lennox Boulevard/Inglewood Avenue, Lennox Boulevard/Hawthorne Boulevard, 111th Street/Hawthorne Boulevard, Lennox Boulevard/Freeman Avenue, 104th Street/Inglewood Avenue, and 104th Street/Hawthorne Boulevard is noted.

The County's proposed installation of curb extensions at the southeast and northeast corners at the Century Boulevard/Gramercy Place intersection is noted. The analyses conducted in the Draft EIR at this location did not assume the presence of de-facto right-turn lanes.

LACDPW1-3 Draft EIR, Section 3.7, Greenhouse Gas Emissions, page 3.7-15, describes legislative actions and state-developed plans included in the 2017 Scoping Plan Update that have relevance to the statewide strategy for achieving a 40 percent reduction in greenhouse gas (GHG) emissions by 2030. The comment requests an addition to provide additional specificity regarding Senate Bill (SB) 1383. As such, on page 3.7-15 of the Draft EIR, the fifth bullet is revised to read:

> SB 1383, which requires a 50 percent reduction in anthropogenic black carbon and a 40 percent reduction in hydrofluorocarbon and methane emissions below 2013 levels by 2030, where methane emission reduction goals include a 75 percent reduction in the level of statewide disposal of organic waste from 2014 levels by 2025; and

LACDPW1-4 The comment requests clarifications to three parts of Draft EIR, Section 3.9, Hydrology and Water Quality, as described and addressed below.

Draft EIR, Section 3.9, Hydrology and Water Quality, page 3.9-8, defines that a 100-year flood "has a 1 percent chance or greater of being equaled or exceeded in any given year", however, it is acknowledged that the next paragraph, which discusses the 500-year flood, does not include such definition. In order to provide requested clarification, Draft EIR ,Section 3.9, Hydrology and Water Quality, page 3.9-8, third paragraph, first sentence, is revised to read:

> The Project Site is designated as Zone X (unshaded), which means the Project Site is in an area above the 500-year flood level, indicating that there is a 0.2 percent chance of occurring in any given year.

The Regulatory Setting subsection of Draft EIR, Section 3.9, Hydrology and Water Quality describes relevant federal regulations, including Code of Federal Regulations Title 44, Part 60, which regulates development within flood hazard areas. In order to provide requested clarification to the Regulatory Setting, Draft EIR, Section 3.9, Hydrology and Water Quality, page 3.9-13 to 3.9-14, Code of Federal Regulations paragraph, first sentence, is revised to read:

> Federal regulations governing development in a floodplain are set forth in Code of Federal Regulations Title 44, Part 60, as set forth by the National Flood Insurance Program's development standards for projects within floodplains.

Impact 3.9-3 addresses the potential for the Proposed Project to alter drainage patterns in and around the Project Site. The runoff flows used in the runoff analysis (presented on pages 3.9-29 to 3.9-30 of the Draft EIR, including Table 3.9-7) are taken from the Preliminary Hydrology Report (D&D Engineering Inc., 2019), which is listed as the source of information in Table 3.9-7 and is included as Draft EIR, Appendix Q. As detailed within the Preliminary Hydrology Report, the existing and post-development runoff flow rates "were calculated using the LACDPW Inglewood 50-year, 24-hour isohyet (5.15 inches rainfall depth) and associated runoff coefficient curve."

LACDPW1-5 Intersection #50, Century Boulevard/Van Ness Avenue, is a shared intersection between the City of Inglewood, the City of Los Angeles, and Los Angeles County. The relevant jurisdiction is correctly noted on Table 3.14-8 but is shown as solely the City of Inglewood and the City of Los Angeles in Table 3.14-7 (and in Tables 3.14-15, 3.14-22A, 3.14-22B, 3.14-44, 3.14-48A, 3.14-48B, and 3.14-62.). The jurisdiction of Intersection #50 shown in Tables 3.14-7, 3.14-15, 3.14-22A, 3.14-22B, 3.14-44, 3.14-48A, 3.14-48B, and 3.14-62 is revised to change "Inglewood" to "Inglewood/Los Angeles County".

Intersection #66, Lennox Boulevard/Freeman Avenue, is entirely within the jurisdiction of Los Angeles County. This is correctly noted in Table 3.14-8 but

the jurisdiction of Intersection #66 is incorrectly shown as the City of Inglewood in Table 3.14-7 (and in Tables 3.14-15, 3.14-22A, 3.14-22B, 3.14-44, 3.14-48A, and 3.14-48B). The jurisdiction of Intersection #66 shown in Tables 3.14-7, 3.14-15, 3.14-22A, 3.14-22B, 3.14-44, 3.14-48A, and 3.14-48B is revised to change "Inglewood" to "Los Angeles County".

Intersection #74, Hawthorne Boulevard/Westbound I-105 Off-Ramp, is a shared intersection between the City of Hawthorne, Los Angeles County, and Caltrans. However, the jurisdiction is shown incorrectly as the City of Hawthorne and Caltrans in Table 3.14-8 (and in Tables 3.14-22B, 3.14-31, 3.14-48B, 3.14-52, 3.14-59, 3.14-60, 3.14-62, 3.14-63, 3.14-64, 3.14-67, 3.14-70, 3.14-73, 3.14-76, 3.14-81, 3.14-84, 3.14-87, 3.14-90, 3.14-93, 3.14-98 and 3.14-99). The jurisdiction of Intersection #74 shown in Tables 3.14-8, 3.14-22B, 3.14-31, 3.14-48B, 3.14-52, 3.14-59, 3.14-60, 3.14-63, 3.14-64, 3.14-67, 3.14-70, 3.14-73, 3.14-76, 3.14.-1, 3.14-84, 3.14-87, 3.14-90, 3.14-93, 3.14-98 and 3.14-99 is revised to change "Hawthorne" to "Hawthorne/Los Angeles County".

LACDPW1-6 Mitigation Measure 3.14-2(a) requires the preparation of an Event TMP. As shown in Table S-2, one element of the mitigation measure is that the TMP shall address pedestrian flows through pedestrian flow management, particularly along portions of West Century Boulevard and South Prairie Avenue adjacent to the Proposed Project.

The comment specifically asks about pedestrian flow management in the southwest corner of the Project Site. A Draft TMP is included in Draft EIR, Appendix K.4. As shown on Figures 8 and 9, and discussed on pages 27 through 31 of the Draft TMP, TCOs would be posted at locations along the west side of South Prairie Avenue at the entrance to the West Parking Garage during pre-event periods, at the West Parking Garage exit and 102nd Street during post-event periods, and along the east side of South Prairie Avenue during both pre-event and post-event periods. A pedestrian bridge would be constructed connecting the West Parking Garage on the west side of South Prairie Avenue with the Arena and ancillary uses on the east side in order to physically separate the pedestrian flows between the garage and the arena from the traffic flows on South Prairie Avenue; in addition, the crosswalk across South Prairie Avenue at 102nd Street would be closed during pre-event and post-event periods. The TCOs would prohibit pedestrians from crossing South Prairie Avenue, and would manage the interaction between pedestrians walking on sidewalks along South Prairie Avenue and vehicles entering or exiting the West Parking Garage.

LACDPW1-7 The Draft EIR considers the potential for significant impacts at level of service (LOS) C, D, E, and F using the Los Angeles County significance criteria

published in the County's current "Traffic Impact Analysis Report Guidelines"[3] for all County intersections analyzed for impacts during the typical AM and PM peak hours, time periods for which the criteria was adopted by the County. As discussed on page 3.14-62 of the Draft EIR, as the CEQA lead agency the City of Inglewood used modified significance criteria for the purpose of determining the significance of intersection impacts during the pre-event and post-event hours. Under those criteria, a significant impact was identified only at LOS E and F. The following describes why the City determined that applying graduated criteria at LOS C or D for major event pre- and post-event hours is inappropriate:

1. The Intersection Capacity Utilization (ICU) methodology is typically applied by the City to study the congestion-related impacts of a land development project during the weekday AM and PM peak hours. Part of the rationale for identifying impacts in the LOS C/D range via the ICU methodology is to determine if a project would routinely and predictably consume a considerable portion of the unused capacity of an intersection during standard peak hours. This concept would not apply to major events (i.e., basketball game or concert) at the Project Site because they would neither be daily activities[4] nor would they take place during the weekday AM and PM peak hours.

2. Major events, by their nature, are expected to generate large volumes of traffic immediately preceding and following an event. Based on years of experience with The Forum and the former Hollywood Park racetrack, the City of Inglewood understands that the types of mitigation measures employed to address impacts of major events are typically traffic management strategies meant to optimize the operation of the local streets and roads during heavy traffic flows rather than to increase or maintain underutilized capacity at LOS C/D.

For analysis of impacts related to the Proposed Project's ancillary daytime uses and daytime events during the typical AM and PM peak hours, the County's ICU methodology was used for the analysis of all intersections wholly or partially under the jurisdiction of the County. However, as discussed on page 3.14-19 of the Draft EIR, a microsimulation model was used to analyze impacts to intersections along the West Century Boulevard and South Prairie Avenue corridors (including intersections along West Century Boulevard and South Prairie Avenue themselves and the next signalized intersection on either side of the two arterials) during the pre-event and post-event hours. Unlike static traffic operations analysis (like the ICU methodology), a microsimulation model analysis captures the effects of coordinated signal timing plans, closely spaced intersections, queue spillbacks, imbalanced lane utilization, lane blockages,

3 Los Angeles County Department of Public Works, *Traffic Impact Analysis Report Guidelines*, January 1, 1997.
4 According to Table 3.14-2, regular season basketball games are anticipated to take place 41 times per year and large concerts are anticipated to take place 5 times per year.

pedestrian flows, pick-up/drop-off events, and other considerations that are important to understand and account for in the assessment of the types of traffic flows created before and after major events.

Microsimulation models also account for the effects of queue spillbacks on upstream intersection operations and the effects of pedestrians on network performance. They are particularly suited to analyzing the effects of heavy vehicle flows before and after an event and allow for evaluation of the effectiveness of potential event-related traffic management strategies. Because with a major event at the Project Site these types of conditions would be expected to be present, primarily along portions of the West Century Boulevard and South Prairie Avenue corridors during the pre-event and post-event conditions, those facilities were studied using microsimulation. The Synchro/ SimTraffic microsimulation model analyzes intersection conditions using the delay-based methodology set forth in the *Highway Capacity Manual, 6th Edition* (HCM).[5] Six of the 18 study intersections that are wholly or partially under the jurisdiction of the County were therefore evaluated using the HCM methodology in the microsimulation model during the pre-event and post-event hours. The remaining 12 were analyzed using the ICU methodology as they are located farther away and not within the Crenshaw Boulevard and South Prairie Avenue microsimulation corridors.

Under Adjusted Baseline conditions the Draft EIR identified significant impacts of the Proposed Project at five intersections wholly or partially under the jurisdiction of the County during the AM or PM peak hours for daytime events (some of which were found at LOS C or D) and at three County intersections during the weekday pre-event, weekday post-event, and/or weekend pre-event hours. A number of mitigation measures were identified which could feasibly reduce or eliminate some or all of the identified significant impacts. Mitigation Measure 3.14-2(b) would require the implementation of a TDM Program to reduce Project-related trips, which would in turn reduce the magnitude of Project impacts at all impacted intersections. Mitigation Measure 3.14-2(c) would require physical modifications to mitigate impacts at the Century Boulevard/La Cienega Boulevard intersection. Mitigation Measure 3.14-3(o) would require coordination of traffic signals and optimization of traffic signal timings at intersections along West Century Boulevard. No feasible mitigation measures were identified at the remainder of the impacted County intersections. As discussed on pages 3.14-189 and 3.14-190 of the Draft EIR, the majority of the study area is built out, which limits the locations, magnitude, and types of physical improvements that could be constructed on surface streets. Physical

5 Transportation Research Board, *Highway Capacity Manual, 6th Edition*, 2016.

improvements, such as roadway widenings, were explored but were found to be either ineffective or infeasible due to the need for right-of-way acquisition.

A Draft Event TMP is included in Draft EIR, Appendix K.4. If the Proposed Project is approved, the City would continue to coordinate with the County Department of Public Works and other affected agencies regarding the refinement and implementation of the Event TMP. As such, Draft EIR, Appendix K.4, Table 1 is revised to add the following at the bottom of the table:

County of Los Angeles Department of Public Works (LACDPW)	LACDPW manages and maintains streets and other local roads in unincorporated areas of the County of Los Angeles, including the Lennox area to the southwest of the Project Site. Implementation of any event traffic management measures on streets managed by LACDPW must be coordinated with LACDPW.

LACDPW1-8 The analysis of solid waste that is included in the Impact 3.15-11, indicates that the Proposed Project would result in a net increase of 1,474 tons per year of solid waste over baseline conditions. Because of the capacity of the landfill and the very small percentage of the remaining capacity that would be used for wastes from the Proposed Project, the impact was determined to be less than significant. Since the conduct of the analysis for the Draft EIR, the project applicant has committed to implement a Zero Waste Program as part of its On-Site Local Direct Measures to comply with the provisions of Assembly Bill (AB) 987. The Proposed Project Zero Waste Program would be a waste reduction and diversion program for operations of the Proposed Project, with the exception of the hotel, with a goal of reducing landfill waste to zero. The effectiveness of the program is to be monitored annually through the United States Environmental Protection Agency (EPA)'s WasteWise program or a similar annual reporting system.[6] The Proposed Project Zero Waste Program would include all solid wastes, including organic waste. In order to successfully implement the program, physical space is being planned in back-of-house areas to accommodate collection and handling of solid wastes prior to diversion to other processing facilities. Through this program it is anticipated that the Proposed Project would readily comply with the existing requirements of AB 1826 as well as the pending requirements of SB 1383.

As such, the analysis in the Draft EIR represents a conservative estimate of solid waste that could be generated by a project similar to the Proposed Project, but one that does not achieve compliance with the sustainability goals of the United States Green Building Council (USGBC)'s Leadership in Energy and Environmental Design (LEED) Gold program and a law such as AB 987. In

6 Murphy's Bowl LLC, letter to Mr. Shannon Hatcher, Air Pollution Specialist, California Air Resources Board, November 1, 2019, page 4.

order to reflect the changes that have been made to the solid waste characteristics of the Proposed Project since completion of the analysis in the Draft EIR, the following paragraph is added after the fifth paragraph on page 3.15-80 of the Draft EIR:

> Since the ~~conduct of the~~ analysis for the Draft EIR was conducted, the project applicant has committed to implement an IBEC Zero Waste Program as part of their On-Site Local Direct Measures to comply with the provisions of AB 987. The IBEC Zero Waste Program would be a waste and diversion program for operations of the Proposed Project, with the exception of the hotel, with a goal of reducing landfill waste to zero. The effectiveness of the program is to be monitored annual through the US Environmental Protection Agency (EPA)'s WasteWise program or a similar annual reporting system.[86]
>
> (Footnote 86: Murphy's Bowl LLC, letter to Mr. Shannon Hatcher, Air Pollution Specialist, California Air Resources Board, November 1, 2019, page 4.)

LACDPW1-9 The comment suggests deletion of a duplicative sentence in Draft EIR, Section 3.15, Utilities and Service Systems. In response to this comment, Draft EIR, page 3.15-75, last paragraph, the second to last sentence is deleted, as shown below:

> The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, AB 939 requires city and county jurisdictions to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by the year 2000. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 past the year 2000. ~~AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation.~~ The City of Inglewood's City-wide diversion rate per AB 939 was 62 percent in 2010.[81]
>
> (Footnote 81: City of Inglewood, 2012. Special Meeting of Special Council Evaluation of Solid Waste and Recycling Services Proposals. Available: http://v1.cityofinglewood.org/pdfs/wastemanagement/hfh.pdf. Accessed December 4, 2018.)

LACDPW1-10 In accordance the commenter's request, the Los Angeles County Department of Public Works will be informed of release of any future environmental documents related to the Proposed Project.

LACDPW1-11 This comment is the attachment to which Comment LACDPW1-7 refers. The attachment includes V/C ratio or delay ranges and corresponding levels of

service for signalized and unsignalized intersections, as well as thresholds of significance for signalized and unsignalized intersections. For each type of intersection, thresholds of significance are given for intersections operating at LOS A or B before the addition of project traffic, as well as for intersections operating at LOS C, D, E, and F. This attachment is sourced in the comment as "LA County Traffic Impact Analysis Report Guidelines (May 2007)."

The thresholds of significance shown in this comment differ from the thresholds used in the Draft EIR analysis, which are presented on page 3.14-62 of the Draft EIR. As explained above in Response to Comment LACDPW1-7, the thresholds used in the Draft EIR provide specific criteria for identifying impacts at intersections operating at LOS C, D, E or F before the addition of project traffic, but not for intersections operating at LOS A or B. These thresholds were taken from the January 1, 1997, version of the County's "Traffic Impact Analysis Report Guidelines"[7] and are identical to what is shown in a December 2013 draft revision to those guidelines.[8] The 1997 version is actively linked online as of March 2020 at this address: https://dpw.lacounty.gov/Traffic/Traffic%20Impact%20Analysis%20Guidelines.pdf.

Please also see Response to Comment LACDPW1-7.

7 Los Angeles County Department of Public Works, *Traffic Impact Analysis Report Guidelines*, January 1, 1997.
8 Los Angeles County Department of Public Works, *Draft Traffic Impact Analysis Report Guidelines*, December 2013.

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Letter ALUC (page 1 of 2)

Letter ALUC (page 2 of 2)

Letter ALUC Response	**Bruce Durbin, Airport Land Use Commission (ALUC)** February 6, 2020

ALUC-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.

ALUC-2 The Draft EIR considers an extensive range of environmental effects related to airport and aviation-related issues, including discussions in Draft EIR, Section 3.10, Land Use and Planning, noise and hazards. The proximity of the site to nearby airports, the planning boundaries and related policies of the Los Angeles County Airport Land Use Plan (ALUP) are discussed on page 3.10-3 of the Draft EIR. The Aircraft Noise Mitigation Program and its application to the area in and around the Project Site is presented on page 3.10-4 of the Draft EIR. The Los Angeles County ALUP and its policies are described in detail on pages 3.10-18 and 19 of the Draft EIR, and the consistency of the Proposed Project to those policies is described on page 3.10-34 of the Draft EIR.

Aircraft noise levels at and around the Project Site are described on page 3.11-28 of the Draft EIR, and the effects of aircraft flyovers on the existing vibration setting is described on pages 3.11-28 and 3.11-30 of the Draft EIR. Relevant ALUP policies related to noise are presented on page 3.11-56 of the Draft EIR. The effects of the Proposed Project on the noise environment, including existing aircraft noise levels, are described in Impact 3.11-2 on pages 3.11-104 to 3.11-159 of the Draft EIR. The Draft EIR concludes that the Proposed Project is consistent with the Noise Land Use Compatibility Matrix of the City's General Plan, and the noise levels generated by aircraft operations at nearby airports would be unaffected by the Proposed Project.

Federal aviation regulations relevant to established navigable airspace around LAX and Jack Northrop Field/Hawthorne Municipal Airport (HHR) are described on pages 3.8-22 and -23 of the Draft EIR, and safety related policies of the Los Angeles County ALUP are presented on pages 3.8-26 and -27 of the Draft EIR. The methodology for evaluation of the airport-related hazards of the Proposed Project is described on page 3.8-31 of the Draft EIR. The potential of construction and operation of the Proposed Project to create hazards to navigable airspace and/or operations of LAX and/or HHR, and consistency of the Proposed Project with safety policies of the ALUP are described under Impact 3.8-5 on pages 3.8-44 through 3.8-48 of the Draft EIR.

Referral of the Proposed Project to the ALUC for review is addressed in Mitigation Measure 3.8-5, which requires the project applicant to submit an application to the ALUC for a determination that that the Proposed Project is consistent with the ALUP.

The City of Inglewood will refer the Proposed Project to the ALUC for a consistency determination with the adopted Airport Land Use Compatibility Plan. Mitigation Measure 3.8-5 also requires the project applicant to submit Form 7460, "Notice of Proposed Construction or Alteration," to the FAA or notify the FAA through the Obstacle Evaluation/Airport Airspace Analysis system, consistent with the requirements of 14 Code of Federal Regulations Part 77, prompting completion of an aeronautical study to determine whether the Proposed Project would constitute a hazard to air navigation. With implementation of this mitigation measure, the Proposed Project would be consistent with California Public Utilities Code section 21676(b), as cited in this comment.

During fall 2019, the project applicant submitted Form 7460 to the FAA for a number of elements of the Proposed Project. As of this writing, a Determination of No Hazard to Air Navigation has been issued for the following components of the Proposed Project: Plaza retail and ancillary buildings and signs; West Parking Garage, South Parking Structure, East Parking Garage, and Hotel.[9] The FAA's evaluation of the Arena Structure is ongoing.

ALUC-3 The City of Inglewood has engaged with the Los Angeles County ALUC several times during the preparation of the Draft EIR, and will continue to engage in pre-consultation discussions with staff up to and through the period when the Proposed Project is considered on its merits by the City's Planning Commission and City Council. The City has met and consulted with ALUC staff five times during the preparation of the EIR, with the first meeting on May 8, 2019, and the most recent on March 26, 2020. The City appreciates ALUC staff's availability for these consultations. It is anticipated that further consultation will occur prior to formal submission of materials for ALUC evaluation and consideration. 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.

9 Federal Aviation Administration, Karen McDonald, Specialist, Letter to Chris Holmquist, Murphy's Bowl LLC, October 2, 2019.

Letter BBB (page 1 of 1)

Letter BBB **Tim McCormick, Big Blue Bus, City of Santa Monica**
Response February 6, 2020

BBB-1 The City of Inglewood agrees with the comment regarding the importance of encouraging increased use of rail and bus transit. The City also agrees that encouraging transit use depends in part on the ability of shuttles to travel between Metro stations and IBEC.

The transit mode split modeling conducted as part of the Draft EIR for the Proposed Project assumed that project shuttles to/from the Metro Crenshaw/LAX Line and Metro Green Line light rail stations would travel in congested conditions. If a transit-only lane was implemented by the City before or after events at the Proposed Project, then shuttle travel time for transit riders would likely decrease; transit would become relatively more reliable and attractive; and transit mode shares would increase as compared to those levels estimated in the Draft EIR. Because the transportation analysis in the Draft EIR does not assume such increased transit mode shares, the analysis is conservative.

The City has devoted significant attention to expanding opportunities for transit service in the area. These efforts currently focus primarily on the NFL Stadium, which is scheduled to open in summer 2020. The following discussion provides a brief summary of these efforts.

First, the City is actively coordinating with regional and local transportation agencies to increase municipal bus services as early as the summer of 2020 when the NFL Stadium is anticipated to open. Historically, bus service in the City has remained at low levels. Over the last year, the City has helped increase transit services as follows:

- **LA Metro:** increase in event day service operations, 9 buses from the Green Line and 9 buses from LAX Crenshaw
- **Big Blue Bus Santa Monica:** extended Line 14 from Playa Vista to Inglewood
- **Gardena Transit:** increase event day service operations
- **Torrance Transit:** extended Line 10, "Torrance to Florence", on game and non-game days
- **Long Beach Transit:** Buses will operate from Harbor Gateway Station and Del Amo Station to the NFL Stadium

Second, in support of the opening of the Stadium at the Los Angeles Sports and Entertainment District at Hollywood Park (LASED), the City has been working to develop a Transportation Management and Operations Plan (TMOP) for the

NFL Stadium. As part of the TMOP, the City is exploring operating, on a trial basis, a transit-only lane on La Brea Avenue that would include temporary cones and changeable message signs, and would be managed as necessary by traffic control operators. This transit-only lane would be incorporated into the TMOP, with routes assigned to transit providers such as Big Blue Bus. As the City's NFL Stadium TMOP is implemented, the City intends to develop and refine transit-only lanes and overall circulation plans. In particular, bus routes (including those for Big Blue Bus) and transit-only lanes would be adjusted as appropriate to increase the efficiency and reliability of the transit system.

Bus routes and the transit-only lane system could be expanded to accommodate events at the Proposed Project when it is scheduled to open in 2024. At that time, the City and transit providers would have the benefit of three years of experience managing transit access to the LASED. That experience would be beneficial in determining how best to manage transit operations at the Proposed Project.

BBB-2 The City agrees with the comment that providing reliable, efficient options for traveling between Metro stations and the Proposed Project site is an important component of encouraging transit use. The City also agrees that regional bus transit should be accommodated. As explained in Response to Comment BBB-1, the City is making significant effort to provide such options for all venues along the Prairie Avenue corridor, including The Forum, the NFL Stadium, and the Proposed Project. To these ends, the City looks forward to further collaboration with the commenter and other transit providers, and appreciates the commenter's willingness to participate in these efforts.

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Letter LACFD (1 of 9)

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Letter LACFD (8 of 9)

Letter LACFD (9 of 9)

Letter	**Ronald M. Durbin, Los Angeles County Fire Department (LACFD)**
LACFD	February 13, 2020
Response	

LACFD-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 LACFD-2 through LACFD-6.

LACFD-2 As described on page 3.13-26 of the Draft EIR, the Los Angeles County Fire Department (LACFD, or District) has indicated that additional staffing of one fire captain post position in the City is anticipated to be required in order to offset the cumulative effect on fire protection services due to substantial growth in the project area but that it does not anticipate the need to expand fire or emergency response facilities within the vicinity of the Project Site, even in consideration of cumulative development within the LACFD service area.[10] The LACFD's 2017–2021 Strategic Plan is designed to address short- and long-term challenges and to carry out the County's public safety mission in meeting the current and future needs.

The City of Inglewood contracts with the LACFD for fire protection services. Through that contract, the City provides funding to the District for services; however, the District also collects revenue via property taxes collected within the district. Increased revenues to the City of Inglewood would be sufficient to offset any increase in costs associated with the provision of public services, including fire protection services. Increased personnel costs to the LACFD are expected to be offset through negotiated increased revenues to the LACFD, including increased payments from the City's General Fund to LACFD for fire protection services.[11] The City's approved budget for 2019-2020 states:

> *Los Angeles County Fire Department Contract –The City of Inglewood contracts with the County of Los Angeles for fire protection services. The County added a cost of living adjustment (COLA) to the FY 2019-20 contract for fire services. The total cost for LA County Fire contract is $16,628,412. The COLA increase and an accompanying increase in the County's*

[10] Lorraine Buck, Supervising Planning Analyst, Planning Division, LACFD, letter correspondence dated April 15, 2019.

[11] Chris Jackson, Economic and Community Development Director, City of Inglewood, phone correspondence, April 29, 2020.

employee benefits are the primary factors resulting in a $1,657,322 (11.07%) increase.

The amounts paid or budgeted by the City for LACFD in recent years are:

2016-2017	$12,520,215 (actual)
2017-2018	$12,864,378 (actual)
2018-2019	$14,971,090 (budgeted)
2019-2020	$16,628,412 (budgeted)

As noted above, these payments are from the City's General Fund.[12] The General Fund, in turn, derives most of its revenue from a variety of sources, including property tax, sales tax, utility tax, and various other sources. To the extent the Proposed Project results in increased General Fund revenue, that revenue would be available to meet the City's obligations with respect to payments to LACFD.[13] This information shows that payments from the City of Inglewood or other contracts with nearby cities experiencing cumulative development would be sufficient to cover the cost of these services. The specific allocation of revenues to the funding of positions within the Fire District is subject to budgeting decisions of the LACFD. To reflect the correct revenue source for the LACFD, Draft EIR, page 3.13-26, second paragraph, last sentence is revised to read:

> Similar to the Proposed Project, cumulative projects would generate revenue ~~(e.g., developer fees, property and sales tax revenue)~~ that could be used to offset LACFD expenditures necessary to meet increased demand for fire protection and emergency medical services consistent with its Strategic Plan.

LACFD-3 Design, construction, and operation of the Proposed Project would comply with the requirements of the LACFD Land Development Unit presented in this comment, including general requirements for project compliance with applicable fire and building codes and ordinances, as well as 39 specific requirements and design criteria to be included on the project plans (listed in items 1 through 41). As a matter of course, the City refers development project plans to LACFD for review and comment, and ensures compliance with LACFD design requirements through the Plan Check and Building Inspection

[12] Chris Jackson, Economic and Community Development Director, City of Inglewood, phone correspondence, April 29, 2020.

[13] The information provided in this response is derived from the City's approved budget for 2019-2020. (See https://www.cityofinglewood.org/ArchiveCenter/ViewFile/Item/875.)

process; these same processes would take place through the final design, construction, and operation of the Proposed Project.

The impacts of the Proposed Project on fire protection services are analyzed in Draft EIR, Section 3.13, Public Services. The analysis contained in the Draft EIR determined that the Proposed Project, individually or under cumulative conditions, would not result in a substantial increase in demand for additional fire protection and emergency medical services that would exceed the capability of the LACFD such that it would require construction of new fire protection or emergency service facilities. The Proposed Project would also include infrastructure to meet requirements for fire flow and additional private and public fire hydrants that would meet the requirements of the City's Fire Code, which incorporates Los Angeles County, Title 32, Fire Code and the requirements of the LACFD. Impacts related to fire protection were determined to be less than significant.

During the preparation of the analysis presented in the Draft EIR, the LACFD was consulted and the feedback provided by the LACFD regarding the Proposed Project wasere incorporated. As discussed in Impact 3.13-1 on pages 3.13-13 through 3.13-19 of the Draft EIR, the Proposed Project would be designed and operated in compliance with the City's Fire Code and the City's Building Code.

Because the analysis in the Draft EIR determined that Impacts 3.13-1 and 3.13-2 would be less than significant, there is no requirement for the imposition of mitigation measures. However, as is discussed above, if the Proposed Project is approved, the requirements of the LACFD would be incorporated into and required through the project conditions of approval. The Proposed Project conditions of approval would include:

- provision of fire apparatus access roadways, with appropriate access points, signage and dimensions;
- sufficient water supplies, including meeting fire flow requirements;
- appropriately spaced and unobstructed fire hydrants;
- designated fire lanes;
- traffic calming devices;
- appropriate security gates with Knox Key access; and
- fire resistant doors and materials, as well as walkways, stairwells, and elevator systems (including emergency and fire control elevators) that meet code requirements.

The Proposed Project's conditions of approval would further include fire safety features that would include the installation of automatic fire sprinkler systems, smoke detectors, fire extinguishers, a fire alarm system, building emergency communication system and smoke control system, and appropriate signage and internal exit routes to facilitate a building evacuation if necessary. Further, new construction in the City of Inglewood is subject to LACFD review for compliance with life safety measures. The LACFD is required to grant approval of the plans prior to the City's approval and issuance of a building permit. ~~need to be granted.~~[14]

LACFD-4 The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, fuel modification for Very High Fire Hazard Severity Zones, archaeological and cultural resources, and the County Oak Tree Ordinance. Each of these topics were analyzed in the Draft EIR. The comment provides no specific comments on these issues, and appears to include information related to standard requirements for certain sensitive environmental resources under the purview of the Forestry Division. The discussion below provides an overview of how these issues were addressed in the Draft EIR.

Draft EIR, Section3.9, Hydrology and Water Quality includes Impact 3.9-1 (Draft EIR, pages 3.9-21 through 3.9-24) and Impact 3.9-3 (Draft EIR, pages 3.9-26 through 3.9-31), and Draft EIR, Section 3.6, Geology and Soils, includes Impact 3.6-1 (Draft EIR, pages 3.6-25 through 3.6-26), all of which provide analysis of the Proposed Project effects on issues related to erosion control and watershed management. With regard to erosion, construction of the Proposed Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit, the City's Municipal Code section 10 208, the County's Low Impact Development (LID) Standards Manual, and the USGBC's LEED program. Through these regulations, the project applicant would be required to prepare and implement a LID Report (the Draft LID Report can be found in Draft EIR, Appendix Q) and a Stormwater Pollution Prevention Plan (SWPPP) that, both of which would be subject to review and approval by the City. Implementation of these reports would also serve to reduce any potential impacts to the Dominguez Channel Watershed. Impacts related to these issues, as analyzed in the Draft EIR, were determined to be less than significant.

The effects of the Proposed Project on rare and endangered species are analyzed in Draft EIR, Section 3.3, Biological Resources. As discussed in Impact 3.3-1 (see Draft EIR, page 3.3-13), no species identified as a candidate, sensitive, or

[14] Chris Jackson, Economic and Community Development Director, City of Inglewood, phone correspondence, April 29, 2020.

special-status species in local or regional plans, policies, or regulations, or by the United States Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW) occur within the Project Site. As such, construction and operation of the Proposed Project would result in no impact to sensitive or protected species.

Because the Project Site is located in the City of Inglewood, not unincorporated Los Angeles County, the County Oak Tree Ordinance is not applicable to the Proposed Project. The Draft EIR includes an analysis of the extent to which the Proposed Project may have an impact on trees. As the Draft EIR notes, there are a total of 72 trees present on the Project Site that are considered "protected trees" in accordance with the City of Inglewood Tree Preservation Ordinance (Inglewood Municipal Code Chapter 12, Article 32). As described on page 3.3-3 of the Draft EIR, there is only one native tree species, coast live oak (*Quercus agrifolia*), on the Project Site. The City of Inglewood Tree Preservation Ordinance considers "protected trees" to include coast live oak trees that are at least 4 inches in diameter at breast height.[15] As described in Draft EIR, Section 3.3, Biological Resources (Impact 3.3-3 on pages 3.3-16 through 3.3-18 of the Draft EIR), the Proposed Project would be required to implement Mitigation Measure 3.3-3, which would ensure compliance with the City's Tree Preservation Ordinance. Impacts would be less than significant with implementation of this mitigation measure.

The Project Site is located in a developed urban area served by the City of Inglewood Fire Department and is not located within a very high of high fire hazard severity zone. As such, it would be unnecessary for the Proposed Project to incorporate fuel modification for very high of high fire hazard severity zones. No impacts related to this issue would occur.

Archaeological and cultural resources are analyzed in detail in Draft EIR, Section 3.4, Cultural and Tribal Cultural Resources. As discussed therein, Mitigation Measure 3.4-1 through Mitigation Measure 3.4-3 would be implemented which would require the retention of a qualified archaeologist. In addition, Mitigation Measure 3.4-4 provides procedures that must be implemented in the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the Proposed Project. With implementation of these mitigation measures, development of the Proposed Project would reduce impacts to archaeological and cultural resources to less-than-significant levels.

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[15] City of Inglewood. *Municipal Code Chapter 12 Article 32, Tree Preservation.* www.qcode.us/codes/inglewood. Accessed October 10, 2018.

LACFD-5 Please see Response to Comment LACFD-4.

LACFD-6 As described on page 3.8-40 of the Draft EIR, investigations and remediation are overseen by federal, State, and/or local regulatory agencies, such as the EPA, the California Department of Toxic Substances Control (DTSC), the Los Angeles Regional Water Quality Control Board (LARWQCB), and the LACFD Health Hazardous Materials Division, Site Mitigation Unit (SMU). Agencies such as these review sites on a case-by-case basis and evaluate potential soil- or water-based health hazards in light of current and future planned land uses, characteristics of the contaminants of concern, and potential exposure pathways. While there are no known properties within the Project Site that are under active investigation or remediation, based on the historic uses on the Project Site the potential exists for future construction activities associated with the Proposed Project to disturb previously unidentified contamination. As noted by the commenter, currently the SMU lacks sufficient staffing to oversee potential future environmental cleanups at the Project Site.

In order to clarify the responsibility for oversight of hazardous materials remediation or clean-up activities that may be required on the Project Site, Mitigation Measure 3.8-4, on pages 3.8-43 and 3.8-44 of the Draft EIR, is revised to read:

Mitigation Measure 3.8-4

Prior to initiating any ground disturbing activities on the Project Site, the project applicant shall prepare a Soil Management Plan (SMP) that is submitted to and reviewed and approved by the ~~Los Angeles County Health Hazardous Materials Division (HHMD),~~ California Department of Toxic Substances Control (DTSC), the Los Angeles Regional Water Quality Control Board (LARWQCB), the Los Angeles County Fire Department (LACFD) Site Mitigation Unit (SMU), or other applicable regulatory agency having jurisdiction to review or approve the SMP. The SMP shall be prepared by a Registered Environmental Assessor (REA) or other qualified expert, and shall address the findings of the two EKI technical memoranda dated June 28, 2019, and/or subsequent relevant studies.

During construction, the contractor shall implement the SMP. If unidentified or suspected contaminated soil or groundwater evidenced by stained soil, noxious odors, or other factors, is encountered during site preparation or construction activities on any portion of the Project Site, work shall stop in the excavation area of potential contamination. Upon discovery of suspect soils or groundwater, the contractor shall notify the ~~HHMD~~ DTSC, LARWQCB, SMU, and/or other applicable regulatory agency, and retain an REA or qualified professional to collect soil samples to confirm the type and extent of contamination that may be present.

If contamination is confirmed to be present, any further ground disturbing activities within areas of identified or suspected contamination shall be conducted according to a site specific health and safety plan, prepared by a California state licensed professional. The contractor shall follow all procedural direction given by ~~HHMD~~ DTSC, LARWQCB, SMU, and/or other applicable regulatory agency, and in accordance with the SMP to ensure that suspect soils are isolated, protected from runoff, and disposed of in accordance with transport laws and the requirements of the licensed receiving facility.

If contaminated soil or groundwater is encountered and identified constituents exceed human health risk levels, ground disturbing activities shall not recommence within the contaminated areas until remediation is complete and a "no further action" letter is obtained from the appropriate regulatory agency or direction is otherwise given that construction can commence. The project applicant shall submit the "no further action" letter or equivalent notification to the City prior to resumption of any ground disturbing activity on the relevant portion of the Project Site.

Letter Sanitation (page 1 of 4)

Letter Sanitation (page 2 of 4)

Letter Sanitation (page 3 of 4)

Letter Sanitation (page 4 of 4)

Letter	**Adriana Raza, Sanitation Districts of Los Angeles County**
Sanitation	**(LACSD)**
Response	March 10, 2020

Sanitation-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 Sanitation-2 through Sanitation-7.

The Sanitation Districts of Los Angeles County (LACSD) provided comments in response to the City's NOP on March 27, 2018. Its NOP comment letter is included in Draft EIR, Appendix B. Comments provided in that letter pertaining to environmental issues analyzed in the EIR (i.e., wastewater infrastructure) were considered in the Draft EIR analysis provided in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures.

Sanitation-2 There are two separate sewer systems in the vicinity of the Project Site where wastewater is conveyed: two LACSD trunk sewers (Prairie Avenue Trunk Sewer and South Inglewood Orange Trunk Sewer), and the City of Inglewood local collector sewer lines (see Draft EIR, page 3.15-49). As discussed in the Draft EIR, "[t]he Project Site is subdivided into four tributary areas associated connection points. These points of connection include: (1) the City's sewer line at South Prairie Avenue and West 102nd Street (point of connection 1); (2) the City's sewer line at West 102nd Street west of South Doty Avenue (point of connection 2); (3) the LACSD Prairie Trunk Sewer at Freeman Avenue and 103rd Street (point of connection 3); and (4) the City's sewer line at West 102nd Street at a manhole east of South Doty Avenue (point of connection 4)" (see Draft EIR, page 3.15-55). The Proposed Project would contribute sewage flows to LACSD's Prairie Avenue Trunk Sewer and the South Inglewood-Orange Avenue Sewer. The 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.

Sanitation-3 The estimated wastewater generation (12,764 gallons per day (gpd)) in Table 3.15-13 (see Draft EIR, page 3.15-50) was based on Districts' wastewater generation factors, existing land uses and areas in square feet. It is understood that the measurements of existing wastewater flows (8,955 gpd) can differ depending on current occupancy/ vacancy rates, specific types of commercial

and residential uses, and seasonality. The difference between actual flows presented in the comment and the estimated flows shown in the Draft EIR is approximately 3,800 gpd. The Draft EIR is conservative and provided a baseline for the analysis to assist in comparing existing wastewater flows to those estimated flows from the Proposed Project. The Proposed Project daily average wastewater flows are estimated to be 0.056 million gallons per day (MGD).

Because existing wastewater flows are less than the estimated flows, this results in greater available flow and treatment capacity within the existing sewer and wastewater treatment systems than was presented in the Draft EIR. The analysis in the Draft EIR reviewed the sewer pipeline sizes and evaluated whether there would be capacity within the sewer systems to convey wastewater flows from the Project Site to the Joint Water Pollution Control Plant (JWPCP) facility (see Draft EIR, page 3.15-57). Estimates of new wastewater flows associated with the Proposed Project are based on potable water quantities entering the Proposed Project and then leaving the Proposed Project through sewer systems; the difference between estimated wastewater flows of 3,800 gpd and the existing wastewater flows is inconsequential to the analysis. Upsizing the 12-inch sewer line along West 103rd Street, in combination with the existing City collector sewer lines and LACSD sewer system there would be adequate capacity to serve the Proposed Project (see Draft EIR, page 3.15-58). The results of the analysis are unchanged and the determination of less-than-significant impacts remains as and no new analysis is necessary.

In order to incorporate the information provided by the comment, Draft EIR, page 3.15-50, the second paragraph is revised to read:

> The West Parking Garage Site, East Transportation and Hotel Site, and Well Relocation Site are currently vacant and do not generate wastewater. The six existing developed parcels located in the Arena Site include a fast food restaurant, a motel, a warehouse and light manufacturing facility, a commercial catering business, and a groundwater well and related facilities. These existing uses, excluding the groundwater well and related facilities, generate wastewater that is conveyed by City and LACSD sewer lines and treated at the JWPCP. The existing wastewater demand is estimated based on LACSD wastewater generation factors. Table 3.15-13 details the existing land uses, the estimated daily average wastewater flow, and estimated peak flow. Based on the existing land uses, the estimated existing peak wastewater flow generated at the Project Site is approximately 0.032 MGD. <u>According to LACSD, the existing wastewater generation at the Proposed Project site is 8,955 gpd. Based on this information, peak flows could be 22, 388 gpd or 0.024 MGD. The difference between</u>

actual flows and the estimated flows is approximately 3,800 gallons per day or 0.0038 MGD.

Sanitation-4 The Draft EIR states that estimated average daily flows from the Hollywood Park Specific Plan (HPSP) will be 953,992 gpd (see Table 3.15-14 on page 3.15-52 of the Draft EIR). The comment states that estimated average daily flows from the HPSP will be 1,070,559 gpd. Both estimates are based on LACSD's average wastewater generation factors. The difference in the estimates is due to the use of different land use categories in applying these factors.

The districts within LACSD are using 325 gallons (gal)/1,000 square feet (sf) for the Shopping Center category. The Draft EIR uses of 100 gal/1,000 sf used for Retail (Store) Category. The difference is 225 gal/1,000 sf. The HPSP includes 518,077 sf of Retail uses. Multiplying the 225 gal/1,000 sf by the 518,077 sf of Retail uses, there would be an increase of 116,567 gpd (Daily Average Flow) for a total of 168,375 gpd. The total calculated Daily Average Flow would be approximately 1,070,559 gpd. This would be a 12 percent increase above the 953,992 gpd.

Based on the information provided by LACSD, Draft EIR, page 3.15-51, the fifth and sixth paragraphs are revised to read:

> Table 3.15-14 details the land uses, daily average, and peak flows for the HPSP Adjusted Baseline projects, which shows that the HPSP Adjusted Baseline projects would generate an estimated peak wastewater flow of ~~2.38~~2.67 MGD. This estimate conservatively assumes that no wastewater is currently being generated at the HPSP area under existing conditions.
>
> The JWPCP currently provides treatment for a peak flow of 330 MGD, with a capacity of 400 MGD. With the HPSP Adjusted Baseline projects peak flow included as part of the Adjusted Baseline, this analysis reflects that the JWPCP provides treatment for a peak flow of ~~332.38~~ 332.67 MGD of wastewater.[57]
>
> (Footnote 57: The HPSP peak flow, rather than average flow, was added to existing average flow conditions to provide a conservative analysis.)

Draft EIR, page 3.15-52, Table 3.15-14 is revised per LACSD's Shopping Center wastewater generation rate of 325 gal/1,000 sf:

TABLE 3.15-14
ESTIMATED HOLLYWOOD PARK SPECIFIC PLAN WASTEWATER GENERATION

Hollywood Park Specific Plan Land Use	Unit Contribution	Daily Average Wastewater Generation Factor (gpd)	Daily Average Flow (gpd)	Peak Flow (2.5 x Average) (MGD)	Peak Flow (cfs)
Stadium[a]	70,000 seats	10 gallons/seat/day	700,000	1.75	2.71
Performance Venue[a]	6,000 seats	10 gallons/seat/day	60,000	0.15	0.23
Retail	518,077 sf	~~100~~325 gallons/1,000 sf	~~51,808~~ 168,375	~~0.13~~ 0.42	~~0.20~~ 0.65
Office	466,000 sf	200 gallons/1,000 sf	93,200	0.23	0.36
Residential	314 du	156 gallons/du	48,984	0.12	0.19
Total	—	—	~~953,992~~ **1,070,559**	~~2.38~~ **2.67**	~~3.69~~ **4.14**

NOTE:
gpd = gallons per day; MDG = million gallons per day; cfs = cubic feet per second; sf = square feet; du = dwelling unit

[a] The Sewer Area Study differentiates generation rates between the stadium use and the performance venue use. Since the uses of a stadium and a performance venue are similar in nature, the generation rate for both the stadium and the performance venue is the number of seats.

SOURCE: ESA, 2019. Generation rates are based off of AECOM, 2019. *Sewer Area Study Inglewood Basketball and Entertainment Center*. April 30, 2019 and Sanitation Districts of Los Angeles County, 2020.

The calculated 12 percent increase of 116,567 gpd, or 0.29 MGD of Peak Flow Average (0.42 MGD Total Peak Flow Average) would not be significant as the JWPCP can treat up to 400 MGD and this still within the additional 67.33 MGD of peak flow capacity. Even with these additional wastewater flows, this would not change the conclusion that the impact would be less than significant.

Sanitation-5 Table 3.15-15 presented the Proposed Project wastewater generation quantities, each of the Point of Connection is subtotaled accordingly. According to this table, the Proposed Project would generate an increase estimated at 269,850 gpd in average daily wastewater flow. The comment estimates this increase at 276,794 gpd, a difference of 6,944 gpd, or approximately 2.6 percent. In order to determine the reason for this difference, the City contacted the commenter and obtained a copy of its calculations. Based on a review of these calculations, the following revisions to the estimate have been made.

First, there is a subtotal error in Point of Connection 3 Sports Medicine Clinic and the Community Space generation rates was not included in the subtotal, the subtotal should have been 198,200 gpd for Daily Average Flow, instead of 187,700 gpd. However, the Peak Flow Average (MGD) and Peak Flow (cfs) were subtotaled correctly, 0.50 MGD and 0.77 cfs, respectively. The Peak Flow Average and Peak Flow were used to assess the Proposed Project's contribution to wastewater flows into LACSD's sewer system. As such, the results of the analysis remain unchanged and no new analysis would be necessary.

Second, LACSD removed the existing wastewater generation of 8,955 gpd from the existing land uses at the Project Site.

Third, based on its Table 1, Loadings for Each Class of Land Use, LACSD used 325 gal/1,000 sf for Mixed Use Bldg.

Taking all three of these revisions into account, the comment estimates wastewater generation would be 276,794 gpd (average daily flow. Using LACSD's methodology, the change in average daily flows results in corresponding changes to the estimate of peak flows. As set forth below, the wastewater generation flows and averages presented in the Draft EIR have been revised to correspond with the information provided by LACSD.

The revised estimate of wastewater flows does not alter the Draft EIR's conclusions. There remains adequate capacity to convey and treat the wastewater flows from the Proposed Project. This difference does not change the results of the analysis presented in the Draft EIR. Because the surrounding sewer mains are sized to accommodate peak wastewater flows and the JWPCP has adequate capacity to serve the Proposed Project, this impact would be less than significant (Draft EIR, page 3.15-58).

In order to correct the estimated Project Peak Flow (MGD and cfs) for Point of Connection 1 and the Daily Average Flow (gpd) for Point of Connection 3 Sports Medicine Clinic and the Community Space, Draft EIR, page 3.15-56, Table 3.15-15 is revised to read:

TABLE 3.15-15
ESTIMATED PROPOSED PROJECT WASTEWATER GENERATION AND SEWER CAPACITY SUMMARY

Point of Connection	Proposed Land Use	Unit Contribution	Daily Average Wastewater Generation Factor (gpd)	Project Daily Average Flow (gpd)	Project Peak Flow (2.5 x Average) (MGD)	Project Peak Flow (cfs)	Pipeline Segment Diameter	Total Pipe Capacity[a] (cfs)	Cumulative Contributing Flow (cfs)[b]	Cumulative Contributing Flow (MGD)[b]	Capacity?[b]
1 (City's sewer line at South Prairie Avenue and West 102nd Street)	Food and Drink Building	24,000 sf	1,000 gallons/ 1,000 sf	24,000	0.06	0.09	8	0.34	0.06	0.04	Yes
							8	0.34	0.10	0.07	Yes
	Mixed Use Building	24,000 sf	~~325~~100 gallons/ 1,000 sf	~~2,400~~ 7,800	0.02	~~0.01~~ 0.03	8	0.77	0.01	0.01	Yes
	Subtotal	*48,000*		*~~26,400~~ 31,800*	*~~0.07~~ 0.08*	*~~0.10~~ 0.12*					*Yes*
2 (City's sewer line at West 102nd Street west of South Doty Avenue)	20% Arena	3,700 Seats	10 gallons/ Seat/Day	37,000	0.09	0.14	8	0.54	0.14	0.09	Yes
	Subtotal	*3,700*		*37,000*	*0.09*	*0.14*		*0.54*	*0.14*		*Yes*
3 (LACSD Prairie Trunk Sewer at Freeman Avenue and 103rd Street)	80% Arena	14,800 Seats	10 gallons/ Seat/Day	148,000	0.37	0.57	12	0.83	0.83	0.54	Yes
	Practice Facility	85,000 sf	300 gallons/ 1,000 sf	25,500	0.06	0.10					
	Office Space	71,000 sf	200 gallons/ 1,000 sf	14,200	0.04	0.05					
	Sports Medicine Clinic	25,000 sf	300 gallons/ 1,000 sf	7,500	0.02	0.03					
	Community Space	15,000 sf	200 gallons/ 1,000 sf	3,000	0.01	0.01					
	Subtotal			*~~187,700~~ 198,200*	*0.50*	*0.77*		*0.83*	*0.83*		*Yes*
4 (City's sewer line at West 102nd Street at manhole east of South Doty Avenue)	Hotel	150 rooms	125 gallons/ room/Day	18,750	0.05	0.07	8	0.77	0.07	0.05	
	Subtotal			*18,750*	*0.05*	*0.07*		*0.77*	*0.07*		*Yes*
	Total	**-**						**-**			**-**

NOTE:
gpd = gallons per day; MDG = million gallons per day; cfs = cubic feet per second; sf = square feet; du = dwelling unit

[a] Proposed total sewer pipe design capacity was calculated as ½ full for pipe diameters of 12 inches or lower, and ¾ full for pipe diameters of 15 inches or higher. Total pipe capacity does not include residual capacity.

[b] Includes peak flow volumes from the Adjusted Baseline.

SOURCE: AECOM, 2019. *Sewer Area Study Inglewood Basketball and Entertainment Center Project.* April 30, 2019 and Sanitation Districts of Los Angeles County, 2020.

Draft EIR, page 3.15-58, the first bullet point is revised to read:

- The Proposed Project peak wastewater flows would contribute ~~0.10~~ 0.12 cubic feet per second (cfs) (or ~~0.07~~ 0.08 MGD) to the City's sewer line at point of connection 1, which d5oes not exceed the available capacity of 0.17 MGD.[61] Therefore, point of connection 1 would have a remaining capacity of 0.10 MGD;

(Footnote 61: Estimated capacity for the City's sewer line at South Prairie Avenue and West 102nd Street is 0.23 MGD. Existing peak flow shows an existing peak of 0.06 MGD. This results in an available capacity of 0.17 MGD.)

Draft EIR, page 3.15-58, the last paragraph, second sentence is revised to read:

The wastewater generated by the Proposed Project would be treated at the JWPCP, which has a maximum treatment capacity of 400 MGD and currently provides treatment for a peak flow of 330 MGD. Including peak flows of the Adjusted Baseline projects, the JWPCP provides treatment for a peak flow of ~~332.38~~ 332.67 MGD. Thus, the JWPCP has the capacity to treat an additional ~~67.62~~ 67.33 MGD of peak wastewater flows.

Sanitation-6 Prior to issuance of building permits the City would require the Project Sponsor to adhere to LACSD's policies for review, approval and/or permitting of new connections to LACSD's Prairie Trunk Sewer. 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.

Draft EIR, page 3.15-58, the first full paragraph is revised to read:

An existing City 8-inch-diameter sewer line along West 103rd Street would be upsized to a 12-inch-diameter sewer line and would extend to the Project Site, with a capacity of 0.83 cfs (or 0.54 MGD). With proposed improvements along West 103rd Street to upsize the existing 8-inch-diameter sewer line to a 12-inch-diameter sewer line extended to the Project Site, the existing City collector sewer lines and LACSD sewer system would have adequate capacity to serve the Proposed Project. Prior to issuance of building permits the City would require the Project Sponsor to adhere to the LACSD's policies for review, approval and Trunk Sewer Permit for new connections to LACSD's trunk sewer system.

Sanitation-7 The City consults with LACSD on an ongoing basis to confirm its ability to convey wastewater flows and treat new wastewater flows at its existing facilities, and will continue to do so in the context of other cumulative development in the future. 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.

Sanitation-8 This comment notes that all information concerning the LACSD contained in the Draft EIR is current.

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.

Letter SCAQMD3 (1 of 11)

Letter SCAQMD3 (2 of 11)

Letter SCAQMD3 (3 of 11)

Letter SCAQMD3 (4 of 11)

Letter SCAQMD3 (5 of 11)

Letter SCAQMD3 (6 of 11)

Letter SCAQMD3 (7 of 11)

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Letter SCAQMD3 (9 of 11)

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Letter SCAQMD3 (11 of 11)

Letter SCAQMD3 Response **Lijin Sun, South Coast Air Quality Management District (SCAQMD)** March 10, 2020

SCAQMD3-1 This comment is introductory correspondence from SCAQMD to the City, and also provides a brief summary 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. Specific comments regarding the Draft EIR responded to in Responses to Comments SCAQMD3-2 through SCAQMD3-22.

SCAQMD3-2 Indirect air quality emissions impacts resulting from backfilled events at the Staples Center do not need to be quantified in a manner similar to how they were analyzed for GHG emission impacts, because air quality impacts are assessed on a different time and spatial basis. GHG emission impacts are generally calculated on an annual basis while regional criteria pollutants are calculated as a snapshot of peak daily activities. The analytical approach to the Draft EIR analyses of air quality impacts reasonably differs from the analysis of GHGs including how backfill events that could potentially replace LA Clippers basketball games at Staples Center were accounted for.

The assessment of short- and long-term localized criteria pollutant impacts and annual Toxic Air Contaminants (TAC) impacts appropriately accounts for the direct emissions being net new to the local study area. The assessment of regional criteria pollutants in the Draft EIR presents the daily direct emissions associated with basketball events at IBEC as net new to the Basin as if daily peak emissions associated with LA Clippers games at Staples Center remain unchanged (essentially creating an assumption of full backfill of all vacated event dates at Staples Center). This scenario is unlikely, making the analysis highly conservative, since there is no evidence that a new NBA team or similar tenant with the ability to consistently draw large capacity crowds would be available to replace the LA Clippers dates at the Staples Center. As stated on Draft EIR page 3.7-49 it is likely that most backfilled events at Staples Center would be smaller events with less attendance than typical LA Clippers games.[16] For this reason, the indirect regional criteria pollutant emissions associated with backfill events most likely would be less than the existing baseline emissions for basketball events. Thus, the analysis of regional peak daily criteria emissions in the Draft EIR is highly conservative because it presents results as if two LA Clippers games are occurring simultaneously (one at IBEC and one at Staples

[16] Conventions, Sports and Leisure (CSL), 2019. *Staples Center Vacated Event Days Analysis*. May 14, 2019.

Center) rather than an LA Clippers game at IBEC concurrent with a smaller event at Staples Center. In contrast to the daily emissions analysis of criteria pollutants, the analysis of GHG emissions analyzes annual emissions, and in doing so realistically accounts for the move of the LA Clippers and conservatively assumes up to 100 percent of the basketball games that move to the Proposed Project would be replaced by other events at Staples Center.

The methodologies employed for analyses of criteria pollutants, TACs, and GHGs are based on assumptions that reasonably and accurately reflect the spatial and temporal aspects of the regional, localized, and global impacts described in the Draft EIR. The Draft EIR appropriately analyzes the net change in GHG emissions on a global basis, which includes the moving and backfilling of some activities to the Proposed Project on an annual basis. Therefore, the pollutant-specific analyses in the Draft EIR for air quality and GHG emissions are calculated appropriately.

SCAQMD3-3 Please see Response to Comment SCAQMD3-12.

SCAQMD3-4 As stated in Draft EIR Section 3.2 Air Quality (see page 3.2-54), the Health Risk Assessment (HRA) followed the appropriate procedures and methodology of the approved Office of Environmental Health Hazard Assessment (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments (Guidance)* which includes a 30-year resident and a 25-year worker exposure. As stated on page 2-4 of the Guidance, "[t]he 9 and 30-year durations correspond to the average and high-end of residency time recommended by the U.S. EPA." Additionally, on page 4-21, the Guidance states "[t]he cancer risk estimates for the onsite residences may use a 30-year exposure duration while the 25-year exposure duration is used for a worker." Therefore, the Guidance recommends that the risk associated with the offsite residential and worker receptors should be analyzed for an expected 30-year residency and 25-year career respectively from the start of a project, including the start of construction.

To account for a "30-year" lifetime exposure, the OEHHA Guidance recommends the modeled exposure for a child receptor include the last trimester in utero plus 30 years (for a total exposure of 30.25 years). As shown on Draft EIR Table 3.2-6 (page 3.2-39), construction of the Proposed Project is expected to start July 2021 and end in October 2024, a duration of 3.27 years, (3 years and 14 weeks) with Proposed Project operation commencing immediately thereafter. The HRA results presented in Draft EIR Table 3.2-31 are based on an analysis that adds 26.98 years of Proposed Project operations to the 3.27 years of Proposed Project construction, for a total exposure duration of 30.25 years, consistent with the OEHHA Guidance. As operational activities result in substantially lower emissions of diesel particulate matter (DPM) and mobile

source air toxics (MSATs), the 30-year or 25-year operational exposure starting after construction would be comparatively lower, resulting in lower lifetime risks. Therefore, by including the construction phase in the 30-year and 25-year exposures for offsite residences and workers, the analysis examines residential exposure during the 30.25 year period with the greatest concentrations of DPM. This results in a greater calculated overall risk to residents that live near the site during the 3.27 years of construction and the following 26.98 years of operation than the 30 year exposures to residents that would move into the area after construction and be exposed to 30 years of only operational emissions. The same is true for offsite workers present during the construction phase rather than those that start employment after completion of construction and the opening of the Proposed Project.

The risk calculations for the worst-case 30-year residential exposure and 25-year worker exposure scenarios are a result of the combined risk from exposure to 3.27 years of construction emissions plus the remaining 26.98 years of residential exposure, or the remaining 21.73 years of worker exposure, to long-term operational emissions. The HRA calculates the 3.27 years of construction exposure for residential receptors using the following exposure durations based on age bins:[17] 0.25 years (3 months) for 3rd trimester pregnancy; 2 years for ages 0-2; and 1.02 years for ages 2-16 (see in Draft EIR Appendix D, PDF page 2,203). The HRA calculates the 26.98 years of operational exposure for residential receptors using the following exposure durations based on age bins: 12.98 years for ages 2-16, and 14 years for ages 16-30 for residential exposures.

For worker exposures the HRA assumed the age bin for ages 16-30 for all 25 years (3.27 of construction exposure (see Draft EIR, Appendix D, PDF page 2,777), plus 21.73 of operational exposure (see Draft EIR, Appendix D, PDF page 7,541).

The risk determined from the exposures to construction emissions is added to the risk determined from exposures to operational emissions. Therefore, the sum of exposure durations (3.27 for construction plus 26.98 for operational emissions) gives a total exposure duration of 30.25 years for residential receptors, and the sum of 3.27 years of construction and 21.73 years of operational exposure results in a total exposure duration of 25 years for workers. As such, the HRA presented in the Draft EIR is consistent with the approved OEHHA Guidance, and with exposure periods recommended in the comment.

[17] An "age bin" is a group of ages that is used for statistical analysis. For example, for the HRA in the Draft EIR, the analysis used age bins for groups that range from 0 to 2 years of age; 2 to 16 years of age, and 16-30 years of age based on health and exposure related characteristics. A different study for a different use or subject matter could use age bins of different ages if the study related to other factors such as, for example, education, economics, voting patterns, or other issues of academic or scientific interest.

SCAQMD3-5 All construction equipment determined by the City to be feasible for project construction in electric or alternative fueled models, including concrete/industrial saws, pumps, aerial lifts, material hoists, air compressors, and forklifts, and concrete mixer trucks were identified in Section 3.2, Air Quality, page 3.2-64 and in Appendix D.3-4 Resource Loaded Schedule. It would not be feasible to require the project applicant to use more electric construction equipment than stated in the Draft EIR or zero-emission (ZE) or near-zero emissions (NZE) heavy-duty trucks because such equipment suitable for project construction is/are not now nor is it/are they expected to be commercially available to meet the construction needs of the project within the project schedule.

To assess the feasibility of deployment of ZE or NZE construction equipment, the City retained an air pollution reduction technology expert, Ray Gorski, to conduct a detailed evaluation of the potential commercial availability of construction equipment (including those suggested by the SCAQMD in comments SCAQMD3-14 to 17) and ZE or NZE heavy-duty trucks; the focus of the evaluation was to determine the likelihood that such equipment would be available from probable local equipment suppliers and fleet operators at the time construction would commence on the Proposed Project.[18] This review found ZE and NZE trucks are available but with limited applicability to construction-related activities. According to the City's expert, the vast majority, if not all, truck and equipment operators rely on incentive programs to lower the initial purchase price of alternative fueled vehicles, which can be substantially higher than similar diesel vehicles and equipment. Because no material delivery and haul trucks like those used in construction were identified as receiving a locally-managed near-zero engine incentive, Mr. Gorski finds "under current and foreseeable conditions, a requirement dictating exclusive use of near-zero trucks would be infeasible."

The same report concluded that there are limitations related to the availability/ suitability of electric construction equipment. The types of electric construction equipment cited by SCAQMD in Comment SCAQMD3-17 are compact electric equipment with limited capacity and capabilities, and are not suitable to support a major construction project such as the excavation and construction of the Project. As indicated in Draft EIR, Chapter 2, Project Description, Subsection 2.5.9, Construction and Phasing, the vast majority of earth moving activities at the Project site would require heavy-duty capabilities, since the "[e]xcavation depths on the Arena Site would be [to] a maximum of 35 feet below ground surface to accommodate the Arena bowl." Please also see Responses to

[18] Ray Gorski, *Inglewood Basketball & Entertainment Center Draft EIR: Review of Suggested Mitigation Measures*, May, 2020.

Comments SCAQMD3-14 through -18, and Response to Comment SCAQMD3-22.

Commented [U1]: Add references to NRDC letter as appropriate.

As identified in Draft EIR Section 3.2, Air Quality, the use of commercially available electric construction equipment has been incorporated into the design of the Proposed Project, and is also mandated through mitigation measures, to the extent feasible and applicable to the construction of the Proposed Project. For the reasons discussed above, and based on the conclusion of its air pollution reduction technology expert, the City determined that it would be infeasible to require additional electric equipment or ZE and NZE heavy-duty haul trucks during construction of the Proposed Project because evidence in the record supports the conclusion that such equipment would not be commercially available in sizes capable of the work needed for construction of the Proposed Project. Therefore, all feasible Project Design Features and mitigation measures have been identified in the Draft EIR.

SCAQMD3-6 It is not expected that clean-up activities for hexavalent chromium or total petroleum hydrocarbons (TPH) would be necessary. However, the Final EIR will be updated to include discussion of SCAQMD Rule 1466 Control of Particulate Emissions from Soils with Toxic Air Contaminants (TACs), and SCAQMD Rule 1166 Volatile Organic Compound Emissions from Decontamination Soil. In the unlikely event that detectable hexavalent chromium or TPH are detected during construction activities,[19,20] compliance with soil management procedures outlined within the Soil Management Plan (SMP) along with implementation of SCAQMD Rules 1466 and 1166 during the Proposed Project grading and site preparation phases would minimize the emission of TACs, ensuring that there would be no possible risk of exposure ~~to TACs of~~by nearby sensitive receptors to TACs. In order to reflect SCAQMD Rules 1166 and 1466, additions have been made to the Draft EIR, as shown below.

Draft EIR, page 3.2-30, the following is added after the seventh full paragraph (Rule 1138):

- ***Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil:*** The rule specifies the requirements to control the emission of VOCs from earth-moving of VOC containing soils. The rule includes requirements for a Mitigation Plan, notification prior to decontamination, and monitoring during decontamination. Applicable

19 South Coast Air Quality Management District, 2017. Rule 1166 Volatile Organic Compound Emission from Decontamination of Soil. Accessed on March 13, 2020.

20 South Coast Air Quality Management District, 2001. Rule 1466 Control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed on March 13, 2020.

minimization requirements include the application of water or vapor suppressant.

Draft EIR, Section 3.2, page 3.2-30, the following is added after the ninth full paragraph (Rule 1186):

- ***Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants:*** This rule specifies how to minimize off-site fugitive dust emissions containing TACs during earth-moving activities from sites that meet the applicability requirement. Requirements include monitoring and minimizing the generation of emissions during excavation, grading, handling, treating, stockpiling, transferring, and removing of soil that contains applicable toxic air contaminants.

In order to reflect this additional discussion and provide clarification in Mitigation Measure 3.8-4, Draft EIR, Section 3.8, page -44, this sentence is added to the last paragraph:

If compounds in soil are identified in concentrations that trigger SCAQMD's Rules 1166 or 1466, the SMP will require compliance with such rules.

SCAQMD3-7 Please see Responses to Comments SCAQMD3-3 and SCAQMD3-6. As indicated, the Draft EIR does not need to quantify remediation emissions as remediation is not anticipated to occur on the Project Site. If contaminated soil is encountered during construction, as provided for in Mitigation Measure 3.8-4, such soils would be excavated and transported to an appropriate disposal facility. The air quality emissions associated with those activities are already quantified under the grading phase analysis which accounts for air pollutant emissions from excavation and transport of soils.

As shown in Response to Comment SCAQMD3-3, the discussion of applicable rules on page 3.2-30 of the Draft EIR will be revised to include SCAQMD Rules 1166 and 1466 which address the potential of encountering impacted soils during ground-disturbing demolition and construction activities (i.e., site preparation, grading, and excavation).

Please see Response to Comment SCAQMD3-4, above, which explains how the HRA is consistent with the appropriate procedures and methodology of the approved OEHHA's Guidance, including use of a 30-year resident and a 25-year worker combined construction and operational exposure duration and therefore did not underestimate the cancer risk impact of the Proposed Project.

SCAQMD3-8 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.

SCAQMD3-9 This comment provides a summary of the conclusions of the analysis of construction and operational emissions included in the Draft EIR.

SCAQMD3-10 This comment provides a summary of the conclusions of the health risk assessment for construction and operational activities of the Proposed Project included in the Draft EIR.

SCAQMD3-11 Please see Response to Comment SCAQMD3-2. The analysis of air quality impacts in in the Draft EIR estimates Proposed Project-related criteria pollutant and TAC emissions as net new to the South Coast Air Basin and vicinity of the Project Site. As explained in Response to Comment SCAQMD3-2, the analysis in the Draft EIR is based on more conservative backfill event assumptions than suggested in the comment. Because the analyses of criteria pollutants and TACs assumed that all such emissions would be net new to the Air Basin, there are no additional indirect impacts to quantify. As further explained in Response to Comment SCAQMD3-2, the analysis of GHG emissions appropriately considers existing annual GHG emissions, and incorporates reasonable yet conservative assumptions related to emissions from backfilled and market shifted events. As further explained in Response to Comment SCAQMD3-2, the differences in the analytical methods and backfill assumptions in the criteria pollutant, TAC, and GHG analyses appropriately reflect the temporal and geographic differences in the analyses.

SCAQMD3-12 The air quality analysis is based on the reasonable expectation that no cleanup activities would be required during the ground disturbing or excavation phases of construction of the Proposed Project. Further, any reasonably foreseeable transport of soil is properly accounted for in the Draft EIR, as explained below.

The Draft EIR air quality analysis is based on the best available information about 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." Nevertheless, it is further acknowledged on page 3.8-40 that "the possibility exists for future improvements associated with the Proposed Project to disturb previously unidentified contamination." The contaminants identified as potentially present include hexavalent chromium, chlordane, chrome, lead, and TPH.

While the analysis of the soil samples that were collected across the Project Site included detections of some contaminants (see Draft EIR, pages 3.8-15 to 17), the levels for all the soil samples were below the screening levels for commercial/industrial land uses, with only one exception. A single soil sample

on the East Transportation and Hotel Site detected total petroleum hydrocarbons as diesel that was above the commercial/industrial screening level. However, as stated on page 3.8-42 of the Draft EIR, "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 sample collected that any onsite or offsite remediation would be necessary as part of construction of the Proposed Project.

Although not foreseeable, should cleanup activities be necessary due to an unexpected discovery, no specialty equipment would be needed on-site because it is unlikely that on-site remedial treatment would be required; rather, it is reasonable to expect that under such circumstances, the contaminated soil would be transported offsite for treatment and disposal. With regard to transport, as explained on Draft EIR page 3.2-73, estimated emissions associated with soil hauling as a result of Proposed Project construction are accounted for in the construction calculations of haul trips and are reported in Draft EIR, Appendix D.3, Regional Construction Emissions.

As explained above, based on soil sampling undertaken to characterize the existing site conditions, it is not anticipated that contaminated soil would be encountered during construction of the Proposed Project. However, if construction and excavation activities encounter contaminated soil, based on the information developed and presented in the Draft EIR, it is reasonably anticipated that the amount of soil would be minimal. In an effort to address known onsite contaminants disclosed in the Draft EIR, and prepare for the possibility that some unknown contamination could be encountered during construction, Mitigation Measure 3.8-4 would require the preparation of an SMP prior to any ground disturbing activities, and implementation of the SMP in the event of discovery of any unidentified or suspected contaminated soil or groundwater. Based on available information known to date, additional cleanup equipment beyond that modeled in the Draft EIR is not anticipated, and emissions from vehicles and equipment that would be used for cleanup activities were already accounted for and modeled in the Draft EIR analyses. Since, as explained above, additional remedial activities are not expected, such analyses would be speculative.

Please also see Response to Comment SCAQMD3-19 for further discussion of the reported detection of hexavalent chromium on the Project Site.

SCAQMD3-13 As discussed in detail in Response to Comment SCAQMD3-4, the health risk assessment included analysis of a 30-year residential exposure period for residential receptors and a 25-year exposure period for off-site workers.

SCAQMD3-14 As discussed above under Response to Comment SCAQMD3-5, the City's air pollution reduction technology expert, Ray Gorski, evaluated the availability and applicability of the Cummins Westport 8.9- and 6.7-liter natural gas engines and Roush Cleantech 6.8- liter compressed natural gas and liquefied petroleum gas engines, as suggested in the comment. These types of engines have just recently entered the marketplace, and are available on a limited basis. Because of the current lack of availability, and future uncertainty in the market of on-road trucks appropriate for construction duty, it is not feasible to commit to the technology at this time. Most ZE and NZE on-road vehicles are considerably more expensive than their diesel counterparts, and to acquire such vehicles most fleet owners and operators need assistance from one of several incentive programs offered by the California Air Resources Board (CARB), California Energy Commission (CEC), or programs administered by the SCAQMD. The City's air pollution reduction technology expert reviewed the inventory of vehicles receiving such grants and found that trucks used for material delivery and haul trucks were not identified as receiving a near zero engine incentive.

The heavy-duty NZE trucks that are commercially available have limited applicability to construction-related activities. Performance requirements of heavy-duty on-road trucks for the activities required for the construction of 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. Engines with displacement of 6.7-, 6.8- and 8.9-liters are not used for material delivery or soil transport. Therefore, Mitigation Measure 3.2-2(c)(3) includes all feasible mitigation.

Mitigation Measure 3.2-2(d) requires the project applicant to provide incentives for vendors and material delivery trucks that would be visiting the Proposed Project during operations to encourage the use of ZE or NZE heavy-duty trucks. Requiring NZE trucks during operations, as requested in the comment, 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 further ~~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 ~~with to achieve~~ the 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

Commented [U2]: Global changes for consistency with draft Development Agreement.

to which larger vendors may have access. As of today, there is ~~there is~~ limited penetration of NZE and ZE vehicles in commercial businesses, and specifically the commercial activities that would likely support an event center like the Proposed Project. It is not currently knowable which specific 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.

The Proposed Project would use natural gas concrete trucks as identified in Appendix D.3-4 of the Resource Loaded Schedule. With the limited categories of NZE commercially available trucks, it would be infeasible to require that all trucks serving the Proposed Project during construction and operation to be NZE.[21] As such, Mitigation Measure 3.2.2(d) includes all feasible mitigation.

SCAQMD3-15 The project applicant, in consultation with a construction contractor, identified the list of equipment necessary for construction of the Proposed Project, including which equipment may be alternatively fueled. The types of construction equipment that are commercially available and feasible for application in the construction of the Proposed Project in electric or alternative fueled models are identified on page 3.2-64 of the Draft EIR, which describes Project Design Feature 3.2-1. Commercially available alternative fuel and electric construction equipment, including excavators, wheel loaders, and soil compactors, are compact, medium-duty, with limited capacity and capabilities when viewed in the context of a major construction project like the Proposed Project. As indicated in Draft EIR, Chapter 2, Project Description, Section 2.5.9, Construction and Phasing, the vast majority of earth moving activities at the Project Site would require heavy-duty capabilities beyond those of the ZE equipment recommended by the SCAQMD.

As discussed in Response to Comment SCAQMD3-14, a review of commercially available alternative fueled construction equipment, including those listed by the SCAQMD, was conducted by the City's air pollution reduction technology expert. The review determined that the equipment listed by the SCAQMD would have limited applicability to construction-related activities necessary to construct the Proposed Project. The types of heavy-duty on-road trucks for the activities required for the Project construction (e.g., soil import/export, transport of steel and pre-cast concrete structure elements and materials) are typically larger trucks (Class 8 trucks with a displacement greater than 10 liters) than ~~those~~ currently available ZE or NZE trucks. Therefore, the

[21] Ray Gorski, *Inglewood Basketball & Entertainment Center Draft EIR: Review of Suggested Mitigation Measures*, May, 2020.

City determined that it would be infeasible to require ZE or NZE trucks for material delivery or soil transport during construction.

Additionally, the supportive infrastructure for the electric construction equipment identified in Section 3.2 (see Draft EIR, page 3.2-64) was determined to be sufficient as indicated in Draft EIR, Section 3.5, Energy Demand and Conservation (see Draft EIR, pages 3.5-28 to 3.5-29). During construction electricity would be consumed to power lighting, heating, and cooling in the construction trailers, outdoor lighting of the site, all feasible electric construction equipment, and supply and conveyance of water for dust control. Electricity is supplied by Southern California Edison (SCE) and would be obtained from the existing electrical lines that connect to the Project Site.

Existing utility services including electrical power would be relocated in the first phase of construction activities to maintain existing services and provide temporary power to the parts of the Project Site under active construction. After completion of these relocations and necessary site earthwork, temporary service power would be distributed in each of the four quadrants of the Arena Site and within the West Parking Garage and East Parking Garage and Transportation Hub sites for the purposes of powering electric construction equipment as soon as is feasible and safe, taking into consideration onsite construction activities.

Temporary power distribution from the relocated utility power lines would follow building structure and floor slab installation for each of the construction areas or components of the Proposed Project, at the point during construction activities when it is safe to deploy temporary electrical distribution panels or portable power distribution systems. Temporary power would be distributed throughout the building and site for the duration of Proposed Project construction.

The temporary service would include two 1,600-amp, 480-volt temporary service switchboards, with the locations to be determined based on safety and site conditions. The switchboards would include distribution breakers with sufficient size and quantity to provide temporary construction power for lighting and equipment, and power to construction trailers. The temporary power distribution would include 400-amp conductors from the temporary service power location to the four quadrants of the Project Site.[22]

Although there would be a temporary increase in electricity consumption at the site during construction, approximately 671 megawatt-hours (MWh) per year, the electrical consumption would be within the supply and infrastructure

[22] Dennis Kanuk, 2020. Montgomery Clark Advisors. Email to Christina Erwin, May 6, 2020.

capabilities of SCE~~outhern California Edison~~ (87,143 gigawatt-hours net energy for 2018)[23] (see Draft EIR, pages 3.5-28 and 3.5-29).

As such, all feasible electric construction equipment would be powered by electricity served to the Project Site by SCE~~outhern California Edison~~, and distributed within the Project Site by temporary systems put in place to meet the varying needs of the construction activities during any given phase of construction. The consumption of this energy, and related air emissions, has been accounted for both in the analyses of energy demand and air emissions in the Draft EIR.

SCAQMD3-16 The Draft EIR acknowledges that Proposed Project contributes to Basin-wide NOx emissions. The Draft EIR also acknowledges that the emissions generated by the 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 Project. Please see Responses to Comments SCAQMD-5, SCAQMD3-14, and SCAQMD3-15 for additional detailed discussion of the use ZE and NZE trucks and electric construction equipment during the construction of the Proposed Project.

SCAQMD3-17 The City developed the mitigation measures as presented in the Draft EIR to include feasible strategies based on commercially available alternative fueled construction equipment to reduce emissions. The examples of commercially available equipment provided by the SCAQMD were found to be compact electrical equipment with limited utility on a construction project the size and scope of the Proposed Project. As indicated in Responses to Comments SCAQMD3-5, SCAQMD3-14, and SCAQMD3-15, the vast majority of earth moving activities at the Proposed Project would require heavy-duty capabilities beyond those of the NZE and ZE equipment recommended by the SCAQMD. Rather, major construction activities for the Proposed Project would necessitate the use of heavy-duty off-road construction equipment, including excavators, wheel loaders, and compactors, that operate on diesel fuel, and based on input from the City's air pollution reduction technology expert, the City~~it~~ determined that it would be infeasible to require this type of construction equipment to be electric or alternatively fueled.

SCAQMD3-18 As discussed in Responses to Comments SCAQMD3-5, -14, -15, -16, and -17, the City developed the mitigation measures presented in the Draft EIR to include feasible strategies based on commercially available equipment to reduce emissions. Requiring the exclusive use of ZE or NZE heavy-duty vehicles, such

[23] Southern California Edison, 2018. 2018 Annual Report, p. 2. 2018.

as trucks with natural gas engines that meet CARB's low NOx standard, would not be feasible because such vehicles would not be capable of meeting the requirements necessary for the construction of the Proposed Project, and may not be available to vendors or other businesses that are contracted to deliver materials to support operations of the Proposed Project.

Reiterating the discussion above, a review of current commercially available ZE and NZE vehicles undertaken by the City's air pollution reduction technology expert determined that commercially available ZE and NZE construction vehicles do not have the capacity/displacement needed for soil transport and material delivery to and from the Project Site. As discussed previously, mandating exclusive use of ZE or NZE trucks during operations would be infeasible because there is currently limited penetration of NZE and ZE vehicles in the commercial vocations likely to support an event center, and trucks visiting the Project Site would primarily be from third party vendors or tenants who may meet important project applicant and City criteria but that may not have access to ZE and/or NZE delivery vehicles. Thus, because of the uncertainty of the availability in the market of on-road trucks appropriate for construction of the Proposed Project, committing to technology that is not yet commercially available would be speculative and has been determined to be infeasible by the City. Therefore, Mitigation Measure 3.2-2(c)(3) includes all feasible mitigation, as required under CEQA.

The SCAQMD suggested the following six performance standards. Each is presented and discussed below.

- **Develop a minimum amount of ZE heavy-duty trucks that the Proposed Project must use each year during construction to ensure adequate progress. Include this requirement in the Proposed Project's Construction Management Plan.**

  As described in Responses to Comments SCAQMD3-5, SCAQMD-14 and SCAQMD-15, above, requiring a minimum annual amount of ZE heavy-duty truck use at the Proposed Project would be infeasible because of the uncertain commercial availability of ZE trucks in the market or that are appropriate for construction of the Proposed Project. As stated previously, Mitigation Measure 3.2-2(c)(3), which provides for the creation of incentives for the use of ZE and NZE vehicles during Proposed Project construction represents all feasible mitigation.

- **Establish a contractor(s) selection policy that prefers contractor(s) who can supply ZE heavy-duty trucks during construction. Include this policy in the Request for Proposal for selecting contractor(s).**

As described in Responses to Comments SCAQMD3-5, SCAQMD-14 and SCAQMD-15, above, because of the uncertain commercial availability of ZE trucks in the market or that are appropriate for construction of the Proposed Project, the City does not believe that the establishment of a mandatory contractor preference would be an effective or enforceable measure that could reduce heavy-duty truck emissions. As stated previously, Mitigation Measure 3.2-2(c)(3), which provides for the creation of incentives for the use of ZE and NZE vehicles during Proposed Project construction represents all feasible mitigation.

- **Establish a policy to select and use vendors that use ZE heavy-duty trucks. Include this policy in the vendor contracts and business agreements.**

  As described in Response to Comment SCAQMD3-14, establishing a policy that requires the selection and use of vendors that use ZE heavy-duty trucks would be infeasible because trucks visiting the Project Site would primarily be from third party vendors or tenants. Based on a review by the City's air pollution reduction technology expert, the availability of this fleet is unknown.[24] Requiring delivery trucks to be ZE could limit ~~to~~ the types of vendors and brands available to the Project, and could limit the project applicant's ability to further the City's goals of ~~achieve commitments to~~ supporting local small businesses and other similar requirements of the draft Development Agreement. Additionally, it is not currently knowable which vendors or tenants would be present during operations (either at project opening or over time).

  There is no evidence today that Proposed Project suppliers could abide by mandates to provide deliveries and services exclusively or meaningfully using NZE and ZE trucks, and thus a mitigation measure requiring suppliers to do so would be infeasible. The Draft EIR included as much forecasting of the availability of ZE trucks as feasible. As stated previously, Mitigation Measure 3.2-2(d), which requires the use of incentives to enhance the use of ZE and NZE vehicles for vendors and delivery services, represents all feasible mitigation.

- **Establish a purchasing policy to purchase and receive materials from vendors that use ZE heavy-duty trucks to deliver materials. Include this policy in the purchase orders with vendors.**

  As previously explained in Response to Comment SCAQMD3-14, requiring vendors to use ZE heavy-duty trucks is infeasible as trucks visiting the Project Site would primarily be from third

[24] Ray Gorski, *Inglewood Basketball & Entertainment Center Draft EIR: Review of Suggested Mitigation Measures*, May, 2020.

party vendors or tenants serviced by local small businesses ~~through City mandated programs~~. In addition, in order to further ~~ensure that~~ the City's ~~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 ~~with to achieve~~ the 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 have access.

Additionally, it is not currently knowable what vendors or tenants would be present during operations and too speculative to assume that their suppliers could abide by mandates to provide deliveries and services using NZE and ZE exclusively or meaningfully. With the limited categories of ZE commercially available trucks, it would be infeasible to require that trucks serving the Proposed Project to be ZE. As stated previously, Mitigation Measure 3.2-2(d), which incentivizes the use of ZE and NZE vehicles for vendors and delivery services, includes all feasible mitigation.

- **Develop a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks.**

  Developing a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks is not feasible at this time since fleets that have purchased or are in the process of purchasing these types of trucks take advantage of incentives offered by CARB, CEC, and SCAQMD programs. It is uncertain when or the number of these incentives or programs will be granted and therefore developing a timeline to implement the use of ZE heavy-duty trucks would be infeasible. Thus, Mitigation Measures 3.2-2(c)(3) and 3.2-2(d), which would create incentives for the use of ZE and NZE vehicles for vendors and delivery services, includes all feasible mitigation. Please see also Response to Comment SCAQMD3-14.

- **Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE heavy-duty trucks.**

  As stated above, implementing the use of ZE heavy-duty trucks is not feasible at this time. However, as required by Mitigation Measure 3.2-2(c)(3), records of all trucks visiting the Project and within the project applicant's control would be made available to the City upon request. As stated previously, Mitigation Measure

3.2-2(c)(3) and 3.2-2(d), which incentivizes the use of ZE and NZE vehicles, includes all feasible mitigation.

SCAQMD3-19 As part of the hazardous materials and soil sampling conducted on the Project Site, hexavalent chromium was tested for presence out of an abundance of caution, even though there is no historical evidence that activities previously occurred on the Project Site that would result in the production of hexavalent chromium (such as heavy welding activities). In 2017, a total of nine locations were sampled for hexavalent chromium at depths ranging from 0.0 – 1.0 feet below ground surface (bgs) and up to 4.0 – 5.0 feet bgs for a total of nineteen soil samples. Of the nineteen soil samples collected, hexavalent chromium was detected in one sample in the Arena Site at a concentration of 0.490 milligrams (mg)/kilogram (kg), which is below the screening level of 6.2 mg/kg for commercial/industrial.[25] This lone sample could be the result of a false positive since there has been no documented onsite historic usage of hexavalent chromium.

Additional soil sampling, in 2019, also detected hexavalent chromium in soil samples at the West Parking Garage Site and Well Relocation Site at concentrations ranging from 0.34 to 0.60 mg/kg at depths ranging from 0.0 – 1.0 feet bgs and up to 4.0 – 5.0 feet bgs. However, laboratory results also indicated hexavalent chromium in the method blank,[26]which is a quality assurance/quality control measure. The presence of hexavalent chromium in the method blank would indicate that a laboratory contaminant may have affected results, and may indicate that hexavalent chromium was, in fact, not in the soil samples from the site. Due to hexavalent chromium showing up in one sample, below commercial/industrial screening levels, the presence of hexavalent chromium in the method blank, and the lack of historical evidence of industrial activities that could produce hexavalent chromium at the site, the detected hexavalent chromium is likely due to a false positive, rather than any true presence of hexavalent chromium in soil at the Project Site. It is therefore not expected that clean-up activities for hexavalent chromium would be necessary.

However, because impacted soil could be unexpectedly encountered during earth moving activities, Mitigation Measure 3.8-4 would require the project contractor to prepare an SMP prior to the issuance of the first permit for ground disturbing activities. The SMP would ensure that work would be stopped in the excavation area where potential contamination is encountered, and that samples would be collected and then tested to determine the type and extent of contamination that may be present. The development of an SMP prior to ground

[25] EKI Environment & Water, Inglewood Basketball and Entertainment Center Project Investigations, June 28, 2019.

[26] In accordance with standard laboratory procedures for QA/QC, a method blank which is an analyte free matrix, is carried through the complete preparation and analytical procedure. The method blank is used to evaluate contamination resulting from the complete preparation and analytical procedure.

disturbing construction activities would be precautionary and is industry practice when completing ground disturbing activities where legacy contaminants have been detected. Any suspect materials would be isolated, protected from wind and runoff, and disposed of in accordance with transport laws and the requirements of the licensed receiving facility and type of contamination.

SCAQMD3-20 Since TPH was detected in onsite soils above the industrial/commercial screening levels, the Draft EIR has been updated to include the requirements of SCAQMD Rule 1166 requiring a mitigation plan in the event that additional TPH impacted soils are found during earth moving activities. The mitigation plan would be submitted to the Executive Officer for approval prior to commencement of excavation or hauling of VOC-containing soil. Please see Response to Comment SCAQMD3-6.

SCAQMD3-21 Please see Responses to Comments SCAQMD3-1 through SCAQMD3-20, and SCAQMD3-22. As described in the responses to letter SCAQMD3, and elsewhere in this Final EIR, the analysis contained in the Draft EIR is accurate, objective, and based on substantial evidence in the record. The Draft EIR provides a detailed explanation of the methodologies used, the analytical trail from the Proposed Project through the analyses, to the conclusions regarding the significance of the impacts of the Proposed Project. The conclusions are clearly explained and well-founded based upon thorough, fact-based study; they are anything but conclusory. Finally, the responses in this Final EIR represent a good faith response to the SCAQMD's comments, as required pursuant to CEQA Guidelines section 15088.

SCAQMD3-22 As stated in Response to Comment SCAQMD3-5, the City reviewed the electric equipment included in Attachment B, List of Companies and Electric Powered Construction Equipment. As previously mentioned the ZE or alternative fuel construction equipment cited as commercially available by SCAQMD, including excavators, wheel loaders, and soil compactors have limitations that make them infeasible for the Proposed Project. These pieces of construction equipment are compact, medium-duty, electric equipment with limited capacity and capabilities when viewed in the context of a major construction project (see Response to Comment SCAQMD3-14). As indicated above, the vast majority of earth moving activities at the Project Site would require heavy-duty capabilities beyond those of the ZE equipment recommended by the SCAQMD. Thus, the use of electric-powered or alternative construction equipment presented in Project Design Feature 3.2-1 (see Draft EIR page 3.2-64) and in Mitigation Measure 3.2-2, includes all feasible mitigation.

Letter West Basin (page 1 of 1)

Letter West Basin Response **Uzi Daniel, West Basin Municipal Water District**
March 16, 2020

West Basin-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 Response to Comment West Basin-2.

West Basin-2 The City completely understands and appreciates the West Basin Municipal Water District's interest in establishing a sanitation station in the area. As such, the City remains committed as part of its current and continuing discussions with the West Basin Municipal Water District to assist it with finding an acceptable alternative site.

West Basin-3 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.

Letter LACDPW2 (1 of 6)

Letter LACDPW2 (2 of 6)

Letter LACDPW2 (3 of 6)

Letter LACDPW2 (4 of 6)

Letter LACDPW2 (5 of 6)

Letter LACDPW2 (6 of 6)

Letter LACDPW2 Response	**Toan Duong, Los Angeles County Department of Public Works** March 24, 2020

LACDPW2-1 This comment is a duplicate of Letter LACDPW1, above. Please see Responses to Comments LACDPW1-1 through LACDPW1-11.

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Letter LADOT (page 1 of 4)

Letter LADOT (page 2 of 4)

Letter LADOT (page 3 of 4)

Letter LADOT (page 4 of 4)

Letter	**Tomas Carranza, Los Angeles Department of Transportation**
LADOT	**(LADOT)**
Response	March 24, 2020

LADOT-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 LADOT-2 through LADOT-17.

LADOT-2 The comment correctly states the number of scenarios and the approximate geographic range of study intersections that were analyzed in the Draft EIR to assess transportation impacts of the Pproposed Pproject. Please note that the comment inadvertently refers to Table 3.124-3, however the table being referred to is in fact Table 3.14-3 on page 3.14-8 of the Draft EIR.

The comment period on the Draft EIR extended for 89 days, from December 27, 2019 through March 24, 2020. This Final EIR provides responses to comments received by the City during this comment period. The comment's request to continue to provide feedback on the Proposed Pproject analysis is noted. The City welcomes such feedback from the Los Angeles Department of Transportation (LADOT), both during the environmental review process and, if the Proposed Project is approved, during Project construction and implementation. The City notes that, as required by AB 987, additional comments provided by the commenter will be posted to the City's website containing the record of proceedings.

LADOT-3 It is noted that LADOT concurs with the analytical approach used in the Draft EIR which assesses project impacts against Adjusted Baseline Conditions, rather than against Existing Conditions. The City agrees that there is a need for coordination between the HPSP project, particularly NFL stadium Stadium events, and the Proposed Project as the mitigation program is finalized and implemented. The Draft Event TMP, included in the Draft EIR as Appendix K.4, provides for such coordination. Page 41 of the Draft Event TMP states that "[t]he City of Inglewood should convene recurring as-needed meetings of the IBEC, Forum, and NFL Stadium operators to coordinate traffic management activities for overlapping or concurrent events at the three venues and shall ensure that such coordination occurs." As stated on page 1 of the Draft Event TMP, it is intended to be adaptable and updated based on, among other things, "[c]oordination with the operators of the NFL Stadium TMOP and The Forum."

LADOT-4 The comment correctly states the number of intersections wholly or partly in Los Angeles and the number that would be significantly impacted by events at the Proposed Project without and with concurrent events at The Forum.

LADOT-5 The comment refers to the Event TMP as Mitigation Measure 3.14-1(a), however in the Draft EIR the Event TMP is Mitigation Measure 3.14-2(a) (see Draft EIR, pages 3.14-191 and 3.14-193).

The comment requests that the Event TMP be augmented to require communication with LADOT Special Traffic Operations (STO) staff to ensure appropriate measures are considered to address event-related queuing on streets controlled by Los Angeles. The City agrees that ongoing coordination between itself and LADOT is appropriate. As such, Draft EIR, Appendix K.4, Table 1 is revised to add the following at the bottom of the table:

City of Los Angeles Department of Transportation (LADOT)	LADOT manages and maintains streets and other local roads in the City of Los Angeles. Implementation of measures to address potential event queuing conditions on streets managed by LADOT, including deployment of traffic control officers, require communication with the LADOT Special Traffic Operations (STO) staff.

Any locations in Los Angeles where traffic management techniques are deployed as part of the Event TMP would be included in the First Year Typical Event Monitoring Plan, as described in the Draft EIR, Appendix K.4, page 45.

The Event TMP includes monitoring of operations during events. If, during adaptive management of the Event TMP, there is a need to deploy TCOs at locations outside of the City of Inglewood, City staff would coordinate with the affected jurisdictions including the City of Los Angeles. The City of Inglewood has been and is currently coordinating with LADOT as planning for Opening Day of the NFL Stadium in mid-2020 proceeds. The NFL Stadium will have a seating capacity that is almost four times that of the Proposed Project. The development of the TMOP will fulfill a function for the NFL Stadium that is similar to that of the Event TMP for the Proposed Project. Coordination between the City of Inglewood and other agencies will be ongoing after the opening of the NFL Stadium. Thus, if the Proposed Project opens as proposed in Fall 2024, the City would have gained at least three years of experience with managing traffic during major events in the immediate vicinity. The City anticipates that this real-world experience would have significant value in enabling the City, the Project Sponsor, and other stakeholders to refine the Event TMP before the Proposed Project commences operations.

LADOT-6 The comment requests that Mitigation Measure 3.14-2(c) be modified to acknowledge that LADOT may determine that these improvements are

infeasible. The City of Inglewood is amenable to this request. The City of Inglewood has determined that it is appropriate to implement the requested modification to clarify the timing when that determination must be made and to specify that the substitute mitigation measure must be of substantially the same effectiveness and have a substantially similar cost. As such, on page 3.14-199 of the Draft EIR, the following is added at the end of Mitigation Measure 3.14-2(c):

> *Should these improvements be deemed infeasible, the project applicant and City of Inglewood shall work with LADOT to identify and, if feasible, implement a substitute measure of equivalent effectiveness at substantially similar cost. A substitute measure that can improve the overall safety of this intersection could include, but not be limited to, provision of transportation system management (TSM) measures or a commensurate contribution to such measures.*

LADOT-7 The comment requests that Mitigation Measure 3.14-3(j) be modified to acknowledge that LADOT may determine it is infeasible. The City of Inglewood is amenable to this request. The City of Inglewood has determined that it is appropriate to modify the requested modification to clarify the timing when that determination must be made and to specify that the substitute mitigation measure should be of substantially the same effectiveness and have a substantially similar cost. As such, on page 3.14-216 of the Draft EIR, Mitigation Measure 3.14-3(j) is revised to read:

> *The project applicant shall work with the City of Inglewood and the City of Los Angeles to remove the median island on the north leg and construct a second left-turn lane on southbound La Cienega Boulevard at Centinela Avenue. Should these improvements be deemed infeasible, the project applicant and City of Inglewood shall work with LADOT to identify and, if feasible, implement a substitute measure of equivalent effectiveness at substantially similar cost. A substitute measure that can improve the overall safety of this intersection could include, but not be limited to, provision of transportation system management (TSM) measures or a commensurate contribution to such measures.*

LADOT-8 The comment requests that Mitigation Measure 3.14-2(b) be modified to require that the annual TDM monitoring report be made available to LADOT. The City of Inglewood is amenable to this request. As such, Mitigation Measure 3.14-2(b), Draft EIR, page 3.14-198, last full paragraph on this page, the last sentence is revised to read:

> *The monitoring report shall be provided to the City Traffic Engineer (ongoing) and the State of California Office of Planning and Research (through 2030) and made available to LADOT.*

LADOT-9 The City of Inglewood agrees that collaboration and coordination with other stakeholders, including LADOT, is an important component of successful

implementation of the Event TMP. Among other thing, such coordination would enable the City of Inglewood to benefit from LADOT Special Traffic Operation's experience managing other large events. Please see Response to Comment LADOT-5. The Arena Operator and City of Inglewood would develop a mechanism and formal agreement for cost-sharing in the event that the First Year Typical Event Monitoring Plan and subsequent monitoring find that there is a regular and recurring need to deploy TCOs or other traffic control measures on key corridors in the City of Los Angeles.

LADOT-10 The comment requests that funding for ITS improvements at intersections in Los Angeles with unmitigated significant impacts be provided, similar to Mitigation Measure 3.14-2(o) (see Draft EIR, page 3.14-200). The City of Inglewood is amenable to this request. As such, on page 3.14-270 of the Draft EIR, the following is added after Mitigation Measure 3.14-18(r):

Mitigation Measure 3.14-18(s)

The project applicant shall make a one-time contribution of $280,000 to the LADOT to help fund and implement Intelligent Transportation Systems (ITS) improvements at intersections in which the Project causes a significant impact for which a specific mitigation that would reduce this impact to less than significant could not be identified. These 12 intersections are identified in Table 3.14-63 Cumulative plus Project (Major Event) with Mitigation Conditions and Table 3.14-99 Cumulative (with The Forum) plus Project (Major Event) with Mitigation Conditions.

- *Concourse Way / West Century Boulevard*
- *Western Avenue / West Century Boulevard*
- *Vermont Avenue / West Century Boulevard*
- *Van Ness Avenue / Manchester Boulevard*
- *Western Avenue / Manchester Boulevard*
- *Normandie Avenue / Manchester Boulevard*
- *Vermont Avenue / Manchester Boulevard*
- *Hoover Avenue / Manchester Boulevard*
- *Figueroa Street / Manchester Boulevard*
- *I-110 Southbound On/Off-Ramps / Manchester Boulevard*
- *I-110 Northbound On/Off-Ramps / Manchester Boulevard*
- *Crenshaw Boulevard / Florence Avenue*

The comment does not include a request for a specific amount of funding nor for specific ITS improvements at the intersections in the City of Los Angeles found to be significantly impacted by Proposed Project traffic. The City and the

project applicant consulted with LADOT and mutually agreed that this amount represents an appropriate contribution. This is consistent with what has been required for other recent projects that have implemented similar mitigation measures such as: Intersection Traffic Signal Upgrades that will replace older model Type 170 controllers with newer Type 2070 controllers; Closed Circuit Television (CCTV) Cameras that will fund the installation of new CCTV cameras (including necessary mounting poles, fiber optic and electrical connections); and System Loop Detectors (including necessary fiber optic and electrical connections). The City has determined, in consultation with LADOT, that this payment would constitute the Proposed Project's fair-share contribution towards expanding LADOT's existing ITS network. This approach is consistent with CEQA Guidelines section 15130(a)(3).

LADOT-11 The City of Inglewood acknowledges that LADOT's processes would have to be followed for review and approval of physical and other mitigation measures that affect intersections in Los Angeles, and that cooperative mitigation should be coordinated through LADOT's West Los Angeles and Coastal Development Review offices.

LADOT-12 The results of the traffic analysis in the Draft EIR generally show a pattern of identifying more impacts in the scenarios with higher levels of activity in the study area, as shown in Table 3.14-79. Similarly, the results generally show that more impacts occur under cumulative conditions than under conditions with the Proposed Project alone. In fact, the comment's assumption makes intuitive sense, and is generally correct for most projects under most conditions. In this instance, however, there are several reasons why an impact might occur under a scenario with fewer Project-generated trips than under one with more Project-generated trips or under a scenario with more total traffic than under a scenario with less total traffic. An example situation is discussed below.

An impact may occur in a Major Event scenario, but not all concurrent event scenarios because of the varying assumptions regarding trip assignment, including Project-generated traffic, result in shifting patterns around the street and highway network. For example, as described on page 3.14-100 of the Draft EIR, in the analysis of Major Events at the Proposed Project when there is no overlapping event at the NFL Stadium, trips are assigned to the Proposed Project on-site parking and to parking in the HPSP area. However, in the scenarios that include a mid-sized event or an NFL game at the NFL Stadium, as described on pages 3.14-331 and 3.14-332, and depicted in Figure 3.14-23, it is assumed that parking within the HPSP area is in use by NFL Stadium attendees. For this reason, Project-related parking would have to occur at various other off-site locations, and trips are therefore assigned to travel to or from those other parking locations. Further, in the analysis of Major Events, over half of the

study intersections were analyzed with the Highway Capacity Manual Methodology using microsimulation. Under congested conditions, bottlenecks form in the system that can cause a reduction in the amount of traffic reaching downstream locations or can otherwise alter the operation of an intersection. This phenomenon is described on page 3.14-219 of the Draft EIR. Thus, compared to a Proposed Project Major Event scenario, concurrent events are not strictly additive and the impacts are not necessarily as linear in terms of worsening LOS in the simulation as they might be using ICU/CMA methods.

LADOT-13 The reason that significant impacts are identified at the intersections of West Century Boulevard & Western Avenue and at Manchester Boulevard & Vermont Avenue in the Cumulative (with The Forum) plus Project (Major Event) in the weekday pre-event peak hour, but not in the Cumulative (with The Forum and Mid-Sized NFL Stadium Event) plus Project (Major Event) in the same peak hour, is described in Response to Comment LADOT-12. In the Cumulative (with The Forum) plus Project (Major Event) scenario, all Proposed Project vehicles park in on-site parking structures or in the HPSP area, and all Forum trips park at The Forum site and in the HPSP area. In the Cumulative (with The Forum and Mid-Sized NFL Stadium Event) plus Project (Major Event) scenario, the HPSP area is not available for use by the Proposed Project or by The Forum attendees because it is used by attendees to the Mid-Sized Event at the NFL Stadium. In this scenario, the shifts in the assumed location of off-site Project-related parking combine to reduce the volume of traffic ~~in the~~ at the West Century Boulevard & Western Avenue and ~~at~~ Manchester Boulevard & Vermont Avenue intersections.

LADOT-14 The reason that significant impacts are identified at the intersections of West Century Boulevard & Concourse Way in the Adjusted Baseline (with Mid-Sized NFL Stadium Event) plus Project (Major Event) in the weekday pre-event peak hour but not in the Cumulative (with Mid-Sized NFL Stadium Event) plus Project (Major Event) in the same peak hour is described in Response to Comment LADOT-12. The West Century Boulevard & Concourse Way intersection was analyzed with the HCM methodology using microsimulation, and is an example of where the simulation results vary in concurrent events scenarios due to changing congestion in the network. In this instance, congested operations at the nearby intersection of La Cienega Boulevard & West Century Boulevard result in reduced levels of congestion at the West Century Boulevard & Concourse Way intersection.

LADOT-15 The Draft EIR analysis of the intersection of West Century Boulevard & Van Ness Avenue incorrectly analyzed the northbound approach as having one left-turn lane, one through lane and one shared through/right-turn lane. As noted in the comment, the northbound approach of that intersection has one left-turn lane

and one through lane and one de facto right-turn lane. The LOS calculations have been revised using the ICU methodology used by Inglewood and the Critical Movement Analysis (CMA) methodology used by Los Angeles. This correction results in no changes to V/C ratios in the AM peak hour and in the weekday pre-event peak hour. The incremental differences were insubstantial in the other analyzed peak hours; no additional significant impacts were identified and previously identified significant impacts identified were found not to be substantially more severe. Detailed LOS worksheets will be included in the Final EIR. Revised tables 3.14-7, 3.14-8, 3.14-15, 3.14-22B, 3.14-31, 3.14-44, 3.14-48B, 3.14-52, 3.14-59, 3.14-60, 3.14-62, 3.14-63, 3.14-64, 3.14-67, 3.14-70, 3.14-73, 3.14-76, 3.14-81, 3.14-84, 3.14-87, 3.14-90, 3.14-93, 3.14-98, and 3.14-99 are shown in Chapter 2, Revisions to the Draft EIR.

TABLE 3.14-7
INTERSECTION OPERATIONS – EXISTING WEEKDAY AM AND PM PEAK HOUR CONDITIONS

#	Intersection	Methodology[a,b]	Jurisdiction[a]	Peak Hour	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	AM	0.700	B
				PM	~~0.0757~~ 0.783	C
		CMA	City of Los Angeles	AM	0.640	B
				PM	~~0.701~~ 0.728	C

TABLE 3.14-8
INTERSECTION OPERATIONS – EXISTING PRE-EVENT AND POST-EVENT PEAK HOUR CONDITIONS

#	Intersection	Methodology[a,b]	Jurisdiction[a]	Peak Hour	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	Weekday Pre-Event	0.708	C
				Weekday Post-Event	~~0.384~~ 0.428	A
				Weekend Pre-Event	~~0.608~~ 0.616	B
		CMA	City of Los Angeles	Weekday Pre-Event	0.648	B
				Weekday Post-Event	~~0.303~~ 0.349	A
				Weekend Pre-Event	~~0.541~~ 0.551	A

TABLE 3.14-15
INTERSECTION OPERATIONS – ADJUSTED BASELINE PLUS PROJECT (ANCILLARY LAND USES) CONDITIONS

					Adjusted Baseline No Project		Adjusted Baseline Plus Project[c]	
#	Intersection	Methodology[a,b]	Jurisdiction[a]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	AM	0.728	C	0.734	C
				PM	~~0.802~~ 0.828	D	~~0.808~~ 0.832	D
		CMA	City of Los Angeles	AM	0.670	B	0.677	B
				PM	~~0.749~~ 0.776	C	~~0.755~~ 0.780	C

TABLE 3.14-22B
WEEKDAY PM PEAK HOUR INTERSECTION OPERATIONS – ADJUSTED BASELINE PLUS PROJECT (DAYTIME EVENTS) CONDITIONS

					Adjusted Baseline No Project		Adjusted Baseline Plus Project[c]	
	Intersection	Methodology[a,b]	Jurisdiction[a]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	PM	~~0.802~~ 0.828	D	~~0.844~~ 0.868	D
		CMA	City of Los Angeles	PM	~~0.749~~ 0.776	C	~~0.794~~ 0.819	D

TABLE 3.14-31
INTERSECTION OPERATIONS – ADJUSTED BASELINE PLUS PROJECT (MAJOR EVENT) CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Adjusted Baseline No Project V/C or Delay	Adjusted Baseline No Project LOS	Adjusted Baseline Plus Project V/C or Delay	Adjusted Baseline Plus Project LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.754	C	0.790	C
				Weekday Post-Event	~~0.401~~ 0.444	A	~~0.642~~ 0.660	B
				Weekend Pre-Event	~~0.656~~ 0.666	B	0.740	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.696	B	0.736	C
				Weekday Post-Event	~~0.321~~ 0.365	A	~~0.578~~ 0.596	A
				Weekend Pre-Event	~~0.593~~ 0.603	~~A~~ B	0.683	B

TABLE 3.14-44
INTERSECTION OPERATIONS – CUMULATIVE PLUS PROJECT (ANCILLARY LAND USES) CONDITIONS

	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Cumulative No Project V/C or Delay	Cumulative No Project LOS	Cumulative Plus Project[3] V/C or Delay	Cumulative Plus Project[3] LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	AM	0.873	D	0.885	D
				PM	~~0.894~~ 0.933	~~D~~ E	~~0.900~~ 0.937	~~D~~ E
		CMA	City of Los Angeles	AM	0.725	C	0.737	C
				PM	~~0.745~~ 0.788	C	~~0.751~~ 0.792	C

TABLE 3.14-48B
WEEKDAY PM PEAK HOUR INTERSECTION OPERATIONS – CUMULATIVE PLUS PROJECT (DAYTIME EVENTS) CONDITIONS

	Intersection	Methodology[a,b]	Jurisdiction[a]	Peak Hour	Cumulative No Project V/C or Delay	Cumulative No Project LOS	Cumulative Plus Project[c] V/C or Delay	Cumulative Plus Project[c] LOS
50	Van Ness Ave/West Century Blvd	ICU	Inglewood/Los Angeles County	PM	~~0.894~~ 0.933	~~D~~ E	~~0.936~~ 0.973	E
		CMA	City of Los Angeles	PM	~~0.745~~ 0.788	C	~~0.791~~ 0.831	D

TABLE 3.14-52
INTERSECTION OPERATIONS – CUMULATIVE PLUS PROJECT (MAJOR EVENT) CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Cumulative No Project		Cumulative Plus Project	
					V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.841	D	0.878	D
				Weekday Post-Event	~~0.436~~ 0.478	A	~~0.677~~ 0.694	B
				Weekend Pre-Event	~~0.743~~ 0.772	C	~~0.823~~ 0.832	D
		CMA	City of Los Angeles	Weekday Pre-Event	0.691	B	0.730	C
				Weekday Post-Event	~~0.257~~ 0.303	A	~~0.515~~ 0.533	A
				Weekend Pre-Event	~~0.587~~ 0.617	~~A~~ B	~~0.671~~ 0.682	B

TABLE 3.14-59
INTERSECTION OPERATIONS – ADJUSTED BASELINE PLUS PROJECT (DAYTIME EVENT) WITH MITIGATION CONDITIONS

#	Intersection	Method-ology[1,2]	Jurisdic-tion[1]	Peak Hour	Adjusted Baseline No Project		Adjusted Baseline Plus Project		Adjusted Baseline Plus Project with Mitigation	
					V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	AM	0.728	C	0.740	C		
				PM	~~0.802~~ 0.828	D	~~0.844~~ 0.868	D		
		CMA	City of Los Angeles	AM	0.670	B	0.683	B		
				PM	~~0.749~~ 0.776	C	~~0.794~~ 0.819	~~C~~ D		

TABLE 3.14-60
INTERSECTION OPERATIONS – ADJUSTED BASELINE PLUS PROJECT (MAJOR EVENT) WITH MITIGATION CONDITIONS

					Adjusted Baseline No Project		Adjusted Baseline Plus Project		Adjusted Baseline Plus Project with Mitigation	
#	Intersection	Method-ology[1,2]	Jurisdic-tion [1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.754	C	0.790	C		
				Weekday Post-Event	~~0.401~~ 0.444	A	~~0.642~~ 0.660	B		
				Weekend Pre-Event	~~0.656~~ 0.666	B	0.740	C		
		CMA	City of Los Angeles	Weekday Pre-Event	0.696	B	0.736	C		
				Weekday Post-Event	~~0.321~~ 0.365	A	~~0.578~~ 0.596	A		
				Weekend Pre-Event	~~0.593~~ 0.603	~~A~~ B	0.683	B		

TABLE 3.14-62
INTERSECTION OPERATIONS – CUMULATIVE PLUS PROJECT (DAYTIME EVENT) WITH MITIGATION CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Cumulative No Project		Cumulative Plus Project		Cumulative Plus Project With Mitigation	
					V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave & West Century Blvd	ICU	Inglewood/Los Angeles County	AM	0.873	D	~~0.899~~	~~D~~		
				PM	~~0.894~~ 0.933	~~D~~ E	~~0.936~~ 0.973	~~E~~		
		CMA	City of Los Angeles	AM	0.725	C	0.753	C		
				PM	~~0.745~~ 0.788	C	~~0.791~~ 0.831	~~C~~ D		

TABLE 3.14-63
INTERSECTION OPERATIONS – CUMULATIVE PLUS PROJECT (MAJOR EVENT) WITH MITIGATION CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Cumulative No Project		Cumulative Plus Project		Cumulative Plus Project With Mitigation	
					V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.841	D	0.878	D		
				Weekday Post-Event	~~0.436~~ 0.478	A	~~0.677~~ 0.694	B		
				Weekend Pre-Event	~~0.743~~ 0.772	C	~~0.823~~ 0.832	D		
		CMA	City of Los Angeles	Weekday Pre-Event	0.691	B	0.730	C		
				Weekday Post-Event	~~0.257~~ 0.303	A	~~0.515~~ 0.533	A		
				Weekend Pre-Event	~~0.587~~ 0.617	~~A~~ B	~~0.671~~ 0.682	B		

TABLE 3.14-64
INTERSECTION OPERATIONS – ADJUSTED BASELINE (WITH THE FORUM) PLUS PROJECT (MAJOR EVENT) CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Adjusted Baseline (with The Forum) No Project		Adjusted Baseline (with The Forum) Plus Project (Major Event)	
					V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.758	C	0.870	D
				Weekday Post-Event	~~0.568~~ 0.611	~~A~~ B	~~0.809~~ 0.827	D
				Weekend Pre-Event	~~0.658~~ 0.668	B	0.786	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.701	C	0.821	D
				Weekday Post-Event	~~0.499~~ 0.544	A	~~0.757~~ 0.775	C
				Weekend Pre-Event	~~0.595~~ 0.606	~~A~~ B	0.731	C

TABLE 3.14-67
INTERSECTION OPERATIONS – ADJUSTED BASELINE (WITH FOOTBALL GAME AT NFL STADIUM) PLUS PROJECT (MAJOR EVENT) CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Adjusted Baseline (with Football Game at NFL Stadium) No Project		Adjusted Baseline (with Football Game at NFL Stadium) Plus Project (Major Event)	
					V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekend Pre-Event	~~0.678~~ 0.688	B	0.802	D
		CMA	City of Los Angeles	Weekend Pre-Event	~~0.617~~ 0.627	B	0.749	C

TABLE 3.14-70
INTERSECTION OPERATIONS – ADJUSTED BASELINE (WITH MIDSIZE NFL STADIUM EVENT) PLUS PROJECT (MAJOR EVENT) CONDITIONS

					Adjusted Baseline (with Midsize NFL Stadium Event) No Project		Adjusted Baseline (with Midsize NFL Stadium Event) Plus Project (Major Event)	
#	Intersection	Methodology[1,2]	Jurisdiction [1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	Weekday Pre-Event	0.775	C	0.846	D
				Weekday Post-Event	~~0.536~~ 0.579	A	~~0.702~~ 0.720	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.720	C	0.795	C
				Weekday Post-Event	~~0.465~~ 0.510	A	~~0.643~~ 0.661	B

TABLE 3.14-73
INTERSECTION OPERATIONS – ADJUSTED BASELINE (WITH THE FORUM AND MIDSIZE NFL STADIUM EVENT) PLUS PROJECT (MAJOR EVENT) CONDITIONS

					Adjusted Baseline (with The Forum and Midsize NFL Stadium Event) No Project		Adjusted Baseline (with The Forum and Midsize NFL Stadium Event) Plus Project (Major Event)	
#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.780	C	0.873	D
				Weekday Post-Event	~~0.587~~ 0.630	~~A~~ B	~~0.754~~ 0.772	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.725	C	0.824	D
				Weekday Post-Event	~~0.520~~ 0.565	A	~~0.697~~ 0.715	~~B~~ C

TABLE 3.14-76
INTERSECTION OPERATIONS – ADJUSTED BASELINE (WITH THE FORUM AND FOOTBALL GAME AT NFL STADIUM) PLUS PROJECT (MAJOR EVENT) CONDITIONS

					Adjusted Baseline (with The Forum and Football Game at NFL Stadium) No Project		Adjusted Baseline (with The Forum and Football Game at NFL Stadium) Plus Project (Major Event)	
#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	Weekend Pre-Event	~~0.691~~ 0.701	~~B~~ C	0.887	D
		CMA	City of Los Angeles	Weekend Pre-Event	~~0.630~~ 0.641	B	0.839	D

TABLE 3.14-81
INTERSECTION OPERATIONS – CUMULATIVE (WITH THE FORUM) PLUS PROJECT (MAJOR EVENT) CONDITIONS

					Cumulative (with The Forum) No Project		Cumulative (with The Forum) Plus Project (Major Event)	
#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.845	D	0.957	E
				Weekday Post-Event	~~0.603~~ 0.645	B	~~0.844~~ 0.861	D
				Weekend Pre-Event	~~0.745~~ 0.774	C	~~0.869~~ 0.878	D
		CMA	City of Los Angeles	Weekday Pre-Event	0.695	B	0.813	D
				Weekday Post-Event	~~0.435~~ 0.481	A	~~0.693~~ 0.711	~~B~~ C
				Weekend Pre-Event	~~0.589~~ 0.620	~~A~~ B	~~0.719~~ 0.730	C

TABLE 3.14-84
INTERSECTION OPERATIONS – CUMULATIVE (WITH FOOTBALL GAME AT NFL STADIUM) PLUS PROJECT (MAJOR EVENT) CONDITIONS

					Cumulative (with Football Game at NFL Stadium) No Project		Cumulative (with Football Game at NFL Stadium) Plus Project (Major Event)	
#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekend Pre-Event	~~0.765~~ 0.794	C	0.886	D
		CMA	City of Los Angeles	Weekend Pre-Event	~~0.611~~ 0.641	B	0.738	C

TABLE 3.14-87
INTERSECTION OPERATIONS – CUMULATIVE (WITH MIDSIZE NFL STADIUM EVENT) PLUS PROJECT (MAJOR EVENT) CONDITIONS

					Cumulative (with Midsize NFL Stadium Event) No Project		Cumulative (with Midsize NFL Stadium Event) Plus Project (Major Event)	
#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.862	D	0.932	E
				Weekday Post-Event	~~0.571~~ 0.613	~~A~~ B	~~0.737~~ 0.754	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.714	C	0.787	C
				Weekday Post-Event	~~0.410~~ 0.447	A	~~0.579~~ 0.597	A

TABLE 3.14-90
INTERSECTION OPERATIONS – CUMULATIVE (WITH THE FORUM AND MIDSIZE NFL STADIUM EVENT) PLUS PROJECT (MAJOR EVENT) CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Cumulative (with The Forum and Midsize NFL Stadium Event) No Project		Cumulative (with The Forum and Midsize NFL Stadium Event) Plus Project (Major Event)	
					V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.867	D	~~0.959~~	~~E~~
				Weekday Post-Event	~~0.622~~ 0.664	B	~~0.789~~ 0.806	~~C~~ D
		CMA	City of Los Angeles	Weekday Pre-Event	0.719	C	0.817	D
				Weekday Post-Event	~~0.456~~ 0.501	A	~~0.634~~ 0.653	B

TABLE 3.14-93
INTERSECTION OPERATIONS – CUMULATIVE (WITH THE FORUM AND FOOTBALL GAME AT NFL STADIUM) PLUS PROJECT (MAJOR EVENT) CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Cumulative (with The Forum and Football Game at NFL Stadium) No Project		Cumulative (with The Forum and Football Game at NFL Stadium) Plus Project (Major Event)	
					V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Angeles County	Weekend Pre-Event	~~0.773~~ 0.802	~~C~~ D	0.971	~~E~~
		CMA	City of Los Angeles	Weekend Pre-Event	~~0.619~~ 0.650	B	0.828	D

TABLE 3.14-98
INTERSECTION OPERATIONS – ADJUSTED BASELINE (WITH THE FORUM) PLUS PROJECT (MAJOR EVENT) WITH MITIGATION CONDITIONS

#	Intersection	Methodology[1,2]	Jurisdiction[1]	Peak Hour	Baseline (with The Forum) No Project		Baseline (with The Forum) Plus Project		Baseline (with The Forum) Plus Project With Mitigation	
					V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	Weekday Pre-Event	0.758	C	0.870	D		
				Weekday Post-Event	~~0.568~~ 0.611	A B	~~0.809~~ 0.827	D		
				Weekend Pre-Event	~~0.658~~ 0.668	B	0.786	C		
		CMA	City of Los Angeles	Weekday Pre-Event	0.701	C	0.821	D		
				Weekday Post-Event	~~0.499~~ 0.544	A	~~0.757~~ 0.775	C		
				Weekend Pre-Event	~~0.595~~ 0.606	A B	0.731	C		

TABLE 3.14-99
INTERSECTION OPERATIONS – CUMULATIVE (WITH THE FORUM) PLUS PROJECT (MAJOR EVENT) WITH MITIGATION CONDITIONS

					Cumulative (with The Forum) No Project		Cumulative (with The Forum) Plus Project		Cumulative (with The Forum) Plus Project With Mitigation	
#	Intersection	Methodology[1,2]	Jurisdiction [1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.845	D	~~0.957~~	~~E~~		
				Weekday Post-Event	~~0.603~~ 0.645	B	~~0.844~~ 0.861	D		
				Weekend Pre-Event	~~0.745~~ 0.774	C	~~0.869~~ 0.878	D		
		CMA	City of Los Angeles	Weekday Pre-Event	0.695	B	0.813	D		
				Weekday Post-Event	~~0.435~~ 0.481	A	~~0.693~~ 0.711	C		
				Weekend Pre-Event	~~0.589~~ 0.620	~~A~~ B	~~0.719~~ 0.730	C		

LADOT-16 The Draft EIR inconsistently shows the results of the impact analysis for the intersection of Manchester Avenue & Western Avenue. Table 3.14-22B and Figure 3.14-13 correctly show that it would be significantly impacted under Adjusted Baseline plus Project (Daytime Events) in the PM peak hour. The results for this intersection were inadvertently omitted from Table 3.14-59. The corrected table is shown in full in Chapter 2, Revisions to the Draft EIR.

TABLE 3.14-59
INTERSECTION OPERATIONS – ADJUSTED BASELINE PLUS PROJECT (DAYTIME EVENT) WITH MITIGATION CONDITIONS

					Adjusted Baseline No Project		Adjusted Baseline Plus Project		Adjusted Baseline Plus Project with Mitigation	
#	Intersection	Methodology [1,2]	Jurisdiction [1]	Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
98	Western Ave/ Manchester Blvd	CMA	City of Los Angeles	PM	0.877	D	0.941	E		

LADOT-17 Please see Responses to Comments LADOT-2, -3, -5, -6, -7, -8, -10, and -11.

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advance page numbers to equal a 90-page letter before response

Letter Metro Response **Shine Ling, Los Angeles County Metropolitan Transportation Authority (Metro)**
March 24, 2020

Metro-1 This comment is introductory correspondence from the Los Angeles Metropolitan Transportation Authority (Metro) to the City. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments Metro-2 through Metro-28. 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.

The comment cites to CEQA Guidelines section 15064.3, subdivision (a). That section states: "This section describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact."

The comment also cites to guidance issued by the Governor's Office of Planning and Research concerning analysis of transportation impacts. (OPR, Technical Advisory on Evaluating Transportation Impacts In CEQA (December 2018)). That technical advisory states:

> ***Impacts to Transit***
>
> *Because criteria for determining the significance of transportation impacts must promote "the development of multimodal transportation networks" pursuant to Public Resources Code section 21099, subd. (b)(1), lead agencies should consider project impacts to transit systems and bicycle and pedestrian networks. For example, a project that blocks access to a transit stop or blocks a transit route itself may interfere with transit functions. Lead agencies should consult with transit agencies as early as possible in the development process, particularly for projects that are located within one half mile of transit stops.*
>
> *When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new transit users as an adverse impact. An infill development may add riders to transit systems and the additional boarding and*

> *alighting may slow transit vehicles, but it also adds destinations, improving proximity and accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network.*
>
> *Increased demand throughout a region may, however, cause a cumulative impact by requiring new or additional transit infrastructure. Such impacts may be adequately addressed through a fee program that fairly allocates the cost of improvements not just to projects that happen to locate near transit, but rather across a region to all projects that impose burdens on the entire transportation system, since transit can broadly improve the function of the transportation system.*
>
> (*Ibid.*, p. 19.)

The City has considered CEQA Guidelines section 15064.3 and OPR's technical advisory in preparing the transportation analysis (see, e.g., Draft EIR, pages 3.14-131 through 3.14-132).

Metro-2 As noted in the comment, Metro and the City of Inglewood have collaborated on numerous projects within the city. This collaboration would continue as the Proposed Project is constructed and operated.

Metro-3 This comment expresses the Proposed Project's significance to the City as well as summary of the past collaborative efforts between the commenter and the City. 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.

Metro-4 This comment provides an accurate summary of the key elements 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.

Metro-5 As described on page 2-58 of the Draft EIR, the Proposed Project as proposed and analyzed in the Draft EIR would operate shuttle service that would connect the Project Site to the Metro Green Line (C Line) Hawthorne/Lennox Station and the Metro Crenshaw/LAX Line (K Line) Downtown Inglewood Station. The transportation analysis in the Draft EIR therefore assumed shuttles to these two stations. However, the TDM Program identified as Mitigation Measure 3.14-2(b), expands on this and calls for three stations to be served, including the

Metro Crenshaw/LAX Line (K Line) AMC/96th Station (see Mitigation Measure 3.14-2(b) on pages 3.14-195 and 3.14-196 of the Draft EIR). The third station is also referenced in the Draft Event Transportation Management Plan in Draft EIR, Appendix K.4, as noted in the comment.

While it is anticipated that the Hawthorne/Lennox Station Green Line (C Line) station and the Downtown Inglewood Crenshaw/LAX (K Line) station would be the two primary stations from which attendees would transfer between rail and shuttle buses, the project applicant's application for approval under AB 987 and Mitigation Measure 3.14-2(b) both provide that a third station (Aviation/ Century Station) on the Crenshaw/LAX line would be served by the shuttle system. Shuttle service to this third station would therefore be provided if this mitigation measure is adopted as proposed. Refer to Response to Comment Metro-17 for more in-depth information pertaining to coordination with Metro regarding shuttle buses and stations.

Metro-6 The comment provides a correction to the timing of "shake ups," minor adjustments to bus service. As such, on page 3.14-47 of the Draft EIR, last full paragraph is revised to read:

> Metro provided ridership data for Lines 117, 211, and 212, which represent averages for April 2018. Both rail and bus ridership are reflective of the service levels in effect in the first half of 2018. Metro typically makes minor and major adjustments ("shake ups") to their bus service in June ~~July~~ and December, so the ridership is reflective of the December 2017 "shake up". Bus data for weekdays includes average daily boardings (i.e., "ons"), alightings (i.e., "offs"), and counted passenger load per bus run approaching each stop.

Metro-7 The comment provides a correction to the proscribed period for the Metro rail plan. As such, on page 3.14-53 of the Draft EIR, last paragraph, the third sentence is revised to read:

> The Metro board has currently approved Alternative C-3 for a ~~two~~ one-year pilot program as opposed to the staff recommended Alternative C-1.[4]
>
> (Footnote 4: https://boardagendas.metro.net/board-report/2018-0710/.)

Metro-8 The analysis presented in Table 3.14-37 presumed two-car trains would operate on the Metro C Line (Green Line) on weekdays after 9:00 PM. This assumption was based on data provided by the Metro Service Performance Analysis Group indicating that, based on trips sampled in fiscal year 2018, two-car trains were operational on weekdays after 9 PM. Additionally, a presentation given to the

Metro Operations, Safety, and Customer Experience Committee on November 15, 2018 regarding the Crenshaw/LAX – Green Line Operating Plan did not indicate plans to operate the C Line with one-car trains. Thus, when the analysis was performed, there was no available data or other indications to suggest that service could be reduced to one-car trains. This comment does not directly state that one-car trains would be operating after 9 PM on weekdays. Rather, it suggests that resource availability (i.e., rail cars, train operators, and budget) would help determine whether two-car trains can operate after 9 PM. Under a scenario in which an event was not being held at the Proposed Project, a service reduction to one-car trains would result in the eastbound load of 622 passengers during the post-event peak hour exceeding the line capacity of 425 passengers. Hence, the line would be overcapacity without an event at the Proposed Project, which suggests this line would be as or more appropriate than other lines to maintain two-car trains after 9:00 PM.

The remainder of this comment relates to platform design considerations for the K Line, for which a conclusion is reached that if grant funding is not secured from the State, trains may be limited to two-car service (versus three). Since the analysis of the Metro K Line (Crenshaw/LAX Line) relied on two-car trains, this uncertainty does not affect the Draft EIR analysis of this transit line.

Metro-9 This comment is advisory in nature, to inform the City of Inglewood and operator of the Proposed Project that the Metro K Line (Crenshaw/LAX Line) may have temporary operational limitations when the Proposed Project is under construction and would open due to construction activity in the vicinity of Centinela Avenue and Florence Avenue. The Florence Avenue/Centinela Avenue intersection was analyzed as an at-grade light rail crossing that would be pass through the intersection. Because the potential future Centinela/Florence grade separation project is currently under preliminary study, and has not yet moved into the engineering design and environmental study stage, it is not appropriate for consideration as a cumulative project.

Metro-10 The public bus services currently operating in the vicinity of the Proposed Project are described on page 3.14-47 of the Draft EIR and in Technical Memorandum #1-Suppemental Information Regarding Existing Conditions in Draft EIR, Appendix K.1. This comment is advisory in nature, to inform the City of Inglewood and operator of the Proposed Project that bus service in the immediate vicinity of the Project Site may be expanded in the future.

Metro-11 Metro's support for the relocated northbound South Prairie Avenue bus stop from the near side of West Century Boulevard to the far side is noted, as is its support for the permanent relocation of the stop on the south side of West Century Boulevard east of South Prairie Avenue.

Metro-12 Metro's request to situate the temporary bus stop on West Century Boulevard at a location 60 feet west of the Starbucks driveway (instead of directly west of South Prairie Avenue) has been forwarded to the City for its consideration. The City and the project applicant would coordinate with Metro to identify a mutually acceptable temporary bus stop. It is possible that this bus stop may need to be temporarily relocated during different phases of construction. For instance, an alley connecting to West Century Boulevard is proposed for construction west of the Starbucks driveway (i.e., in the vicinity of Metro's identified temporary stop location). Farther west is the site of the West Parking Garage. The temporary bus stop may need to be relocated during construction between the alley and the garage frontage (depending on construction staging, open/closed to traffic, etc.).

Metro-13 This comment is advisory in nature, to inform the City of Inglewood and operator of the Proposed Project that bus stops (either temporary or permanent) must be designed in accordance with ADA standards. 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.

Metro-14 Mitigation Measure 3.14-15 requires the preparation by the project applicant and the review and approval by the City of a Construction Traffic Management Plan. The measure requires that the plan be developed "in consultation with affected transit providers and local emergency providers." Specifically, subsection g requires that the plan include provisions to "[m]aintain safe and efficient access routes for emergency vehicles and transit." In order to reflect the request of the commenter, Draft EIR, page 3.14-253 is revised to add the following as a footnote to Mitigation Measure 3.14-15, bullet g):

> g) *Maintain safe and efficient access routes for emergency vehicles and transit.*[30]
>
> (Footnote 30: The project applicant shall coordinate with Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 not later than 30 days before the start of Project construction. Other municipal bus services may also be impacted and shall be included in construction outreach efforts.

Metro-15 This is an introductory paragraph regarding recommended changes to the Event TMP. 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.

Metro-16 The request for long-term funding for additional rail service and personnel is noted and has been forwarded to the City and the project applicant for their information and consideration. 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.

Metro-17 As discussed in the Response to Comment Metro-5, the Proposed Project as analyzed in the Draft EIR would operate shuttle service to two stations. The project applicant's application for approval under AB 987 and Mitigation Measure 3.14-2(b) expanded on this and provided for three stations to be served. However, as noted in the Response to Comment Metro-5, compliance with requirements of AB 987 and Mitigation Measure 3.14-2(b) require inclusion of three Metro stations in the project shuttle system. The project applicant would coordinate with Metro's Special Events Bus and Rail Team to determine how best to meet demand and make changes to servicing rail stations, if warranted, with Metro's input. The Event TMP has been modified to require such coordination, and notes that there would be ongoing discussions regarding which stations are most appropriate for use. This approach ensures that shuttle service would be monitored and, if appropriate, adjusted. As such, the following is added as the second paragraph in the LRT Station Access section on page 17 of Draft EIR, Appendix K.4:

> The IBEC operator will coordinate with Metro's Special Events Bus and Rail Team to determine how best to meet demand, to discuss which stations are most appropriate for use, and to make changes to servicing rail stations, if warranted, with Metro's input.

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.

Metro-18 Mitigation Measure 3.14-2(b) describes the TDM Program that the project applicant must implement. Part 1 of the TDM Program states that the project applicant must encourage alternative modes of transportation by providing monetary incentives and bus stop improvements near the Proposed Project. Integrated event-transit ticketing, discounted event tickets with a transit purchase, giveaways to transit users, bus stop improvements, transit subsidies, and marketing outreach campaigns are all examples of 'leveraging' existing Metro bus service to encourage bus usage.

Metro-19 As described above, Mitigation Measure 3.14-2(b) describes the TDM Program that the project applicant must implement. Part 2 of the TDM Program states that the project applicant must operate a dedicated shuttle service on event days to transport attendees between the Proposed Project and Metro Rail stations. An estimated 27 shuttles with a capacity of 45 passengers each would be operated. Shuttles would pick-up and drop-off attendees on the east side of South Prairie Avenue south of West Century Boulevard. Approximately 250 feet of curb space would be dedicated for this activity, and managed by a TCO. Assuming 24 of the 27 shuttle buses would be used to transport attendees (with the remaining three dedicated for employees who are typically not traveling to/from

these venues right before or after the event concludes), this would provide capacity to transport up to 1,980 persons per hour (i.e., 44 busloads) based on a 30-minute round trip travel time (based on SimTraffic microsimulation analysis output and considering dwell time to drop-off/pick-up passengers). This shuttle capacity implies that 20 of the 24 buses in circulation could complete two fully loaded attendee drop-offs during the pre-event peak hour. This capacity would be more than twice the number of transit riders expected during either the weekday pre-event peak hour condition (900 riders) or the post-event peak hour condition (740 riders) for a Major Event.

While most of the details of the shuttle service have not been finalized at this time, it is anticipated that a series of private shuttles would be in operation. Shuttle bus riders would not be charged to use the system to travel between the Proposed Project and rail stations. Other details relating to funding for the bus operations, headways, and staging are not known at this time and not germane to the Draft EIR and the environmental impacts addressed therein. But it is clear from the Draft EIR and the above that the shuttle service would have ample capacity to accommodate transit riders without causing undue delays.

On days with concurrent events, the type of shuttle bus operation could vary depending on whether parking is available in Hollywood Park or occupied by an event at the NFL Stadium. Depending on site-specific conditions such as event start/end times, shuttle service hours, routes, and staffing needs could change.

Metro-20 Approximately 250 feet of curb space would be dedicated exclusively (and controlled by a TCO via barriers) for shuttle buses to drop-off and pick-up passengers along the project's frontage of South Prairie Avenue. This distance would be sufficient for at least three buses to be simultaneously present. If buses operate on five-minute headways, which would be possible given the number of shuttle buses in circulation and round trip travel time, then 36 busloads or capacity for 1,620 riders would be provided. This frequency of shuttle service would provide capacity that would exceed the hourly pre-event peak hour demand by 80 percent. Thus, it is readily apparent the proposed supply of shuttle buses, travel times between the Proposed Project and rail stations, and length of curb space at the Proposed Project would enable safe and efficient operations by shuttle buses during major events.

Bus staging at rail stations would need to be determined at a later date based on coordination with Metro on site-specific conditions. Buses may be able to pick-up or drop-off passengers directly along public streets, or they may circulate within the parking lot depending on event day/time and amount of empty parking. Since a minimum of at least two stations with comparable levels of bus shuttling would be operational during Major Events at the Proposed Project,

this implies that a maximum of 12 buses would be circulating between a given station and the Proposed Project, with typically no more than two buses being present at the station at a given time. Lastly, it is worth noting that the TMOP for the NFL Stadium also calls for operating shuttles between that venue and (likely) these stations. Thus, there would have been at least three years of experience gained from these operations prior to the Proposed Project opening.

Metro-21 This comment includes a number of questions and comments that are largely operational in nature and do not directly address the analysis and conclusions presented in the Draft EIR. Metro is specifically listed as one of the key agencies that would play an important role in helping to implement the Event TMP. If the Proposed Project is approved, pursuant to the Draft Event TMP, the project applicant and the City would continue to work with Metro to address these questions during the detailed design and operational planning phases of the Proposed Project, up to and including opening day. Nevertheless, the discussion below provides current thinking on the issues raised in the comment.

The Draft Event TMP (see Draft EIR, Appendix K.4) discusses traffic management that would occur before and after events including lane/street closures, placement of TCOs, and other elements of event transportation and mobility management. As noted in Response to Comment Metro-20, above, the need for staff to be placed at transfer locations between rail and shuttles would be known (by virtue of recurring events at the NFL Stadium which would be managed through the TMOP) prior to opening of the Proposed Project. Pursuant to the coordination requirements of the Event TMP, should those experiences reveal the need for use of officers and special wayfinding at these transfer locations, this would be discussed and implemented through coordination meetings/calls between Metro, the City of Inglewood, and the arena operator.

Implementation of the TDM Program is required to achieve compliance with commitments made pursuant to AB 987 and to successfully implement the mitigation requirements of CEQA. To accomplish this, many of the suggestions included in this comment (e.g., curb space allocation, wayfinding, promotion of use of transit and subsidy of transit passes), are included in the TDM strategies described in Mitigation Measure 3.14-2(b) (see Draft EIR, pages 3.14-195 through 3.14-199). Potential sale of transit passes inside the arena or within the plaza area would be determined in consultation with the City and Metro.

Metro-22 This is an introductory paragraph regarding recommended measures to shift travel to transit and active transportation modes. 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.

Metro-23 Mitigation Measure 3.14-2(b) requires the implementation of a comprehensive and aggressive set of measures to promote active transportation in a manner that would reduce trip making and resultant production of GHG emissions. Implementation of that program is required to achieve compliance with commitments made pursuant to AB 987 and to successfully implement the mitigation requirements of CEQA. The TDM Program provides for measures that would maximize walking, biking, use of transit, and other non-single occupant vehicle modes of transportation. The comment encourages the project applicant to follow through on the requirements that it would be legally obligated to achieve. 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.

Metro-24 Draft EIR, page 2-62 documents that the Proposed Project would provide approximately on-site 60 bicycle parking spaces for employees. Additionally, 23 short-term bike parking spaces for event attendees would be provided within the West Parking Garage. This supply of bike parking would exceed the applicable City code requirement. The comment cites a design guideline from the Association of Bicycle and Pedestrian Professionals (APBP) to provide bike parking for 2 percent of seating capacity at an event venue; this would correspond to parking for 370 bikes. Provision of such a large supply could result in overbuilding of bike parking since Table 3.14-26 on page 3.14-97 of the Draft EIR indicates that attendee travel mode by bicycle would be less than one percent.

Mitigation Measure 3.14-2(b) describes the TDM Program that the project applicant would be required to implement. Part 4 of the TDM Program states that lists a number of other amenities and services the Proposed Project could offer to encourage bicycling such as bike lockers and showers for employees, bike fix-it station, coordinated bike pools, and sidewalks/pathways designed as safe routes to bicycle parking. If needed to accommodate demand based on bicycle use at the Proposed Project, a bike valet would be accommodated in the West Parking Garage. A bike valet program for occasional events with above average levels of bicycling is preferred over providing such a large amount of fixed bike parking supply that would be substantially underused during the vast majority of events and non-event days at the Proposed Project.

The commenter's recommendations regarding bike parking wayfinding, site visibility, surveillance, and spacing have been forwarded to the project applicant and the City for their consideration during the final design phase of the Proposed Project. Similar to most other arenas, the Proposed Project would not place restrictions on the use of micromobility (i.e., electric scooters, bikeshare, etc.) that would enable attendees to access the site via these modes, although it

should be noted that active bicycle use in a crowded plaza would be a safety hazard and thus discouraged, and e-scooters are not currently licensed to be operated in the City of Inglewood.

Metro-25 The use of first mile/last mile connections may be of particular benefit to employees and customers who work or visit the Proposed Project during non-event days. The Inglewood First/Last Mile Plan is a joint partnership between the City of Inglewood and Metro to increase accessibility, safety, and comfort by providing first mile and last mile solutions that enhance access to four specifically identified stations. Identified solutions contain various infrastructure, lighting, and visual improvements for bicycle and pedestrian access to these stations. The identified stations nearest to the Proposed Project would be the Crenshaw/LAX Downtown Inglewood Station and the Crenshaw Green Line station. The Proposed Project would be designed such that first/last mile connections at the Project Site would be safe, convenient, and efficient. During non-event days, the pullout lane along the east side of South Prairie Avenue at the plaza could be used for pick-up/drop-off. The large plaza and sidewalk spaces would enable future use of micromobility devices such as dockless e-bikes and e-scooters.

Metro-26 The project applicant would consult with Metro regarding any temporary or permanent wayfinding signage that references Metro services, logos, or branding. 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.

Metro-27 As discussed above, Mitigation Measure 3.14-2(b) and commitments have been made pursuant to AB 987 require the project applicant to implement a comprehensive and aggressive TDM Program that promotes active transportation and use of non-single occupant vehicle modes of transportation. The various employee transit pass programs described in this comment would be consistent with that program. 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.

Metro-28 This concluding comment provides contact information for the commenter. 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 Culver CityBus (page 1 of 2)

Letter Culver CityBus (2 of 2)

Letter Culver CityBus Response **Culver CityBus**
March 31, 2020

The City of Inglewood received a letter from Culver CityBus commenting on the Draft EIR. The letter is dated "March 2020," but does not include the specific date of the letter. The City received the letter on March 31, 2020. The letter was therefore submitted after the deadline for comment on the Draft EIR. Because Culver CityBus submitted the letter after the deadline, the City of Inglewood is not required to provide responses. The City nevertheless provides the following responses.

Culver CityBus-1 The City of Inglewood is leading an effort to prepare a TMOP which will provide the framework and directions for management of transportation and circulation for events at the NFL Stadium. The Draft TMP for the Proposed Project, including as Draft EIR, Appendix K.4, includes Chapter 11 which addresses transportation management during concurrent events at The Forum and/or the NFL Stadium. Regarding the NFL Stadium, the Draft Event TMP states:

> *The IBEC operator should coordinate with the City and with the operator responsible for implementation of the Transportation Management and Operations Plan for events at the NFL Stadium when concurrent or overlapping events are scheduled to occur at the IBEC and the NFL Stadium. Coordination may be required on numerous aspects of the TMP and the Stadium TMOP, including but not limited to placement of TCOs, temporary lane changes, and neighborhood protection.*

As such, the Draft TMP already provides for the type of coordination between the Proposed Project arena operator and the NFL Stadium that is suggested in the comment.

In addition, Chapter 4 of the Draft TMP addresses transit service to and from the Proposed Project events. The Transit Element addresses access and shuttle operations to and from the LA Metro Green Line's Hawthorne/Lennox Station, the Metro Crenshaw/LAX Line's Downtown Inglewood Station (at La Brea Avenue and Florence Avenue), and possibly the Metro Crenshaw/LAX Line's Aviation/Century Station before and after LA Clippers basketball games and other large events. It does not currently address coordination with transit providers for other types of transit service. As such, Draft EIR, Appendix K.4, page 18, the following is added after the final paragraph:

SERVICE PROVIDER COORDINATION

The IBEC operator should coordinate with regional transit providers on route and bus stop planning should any transit provider choose to service events at the arena.

It is anticipated that the Proposed Project, and the implementation of the Event TMP, will benefit significantly from the City's experience implementing the TMOP for the stadium. By the time the IBEC commences operations, the stadium will have been in operation for three years. The City will thus have three years' of actual experience implementing the TMOP, including efforts to coordinate with transit service providers such as Culver CityBus. This experience will inform the City's and the IBEC operator's implementation of the TMP. The City welcomes the opportunity to coordinate with Culver CityBus and other transit providers.

Culver CityBus-2 Separate from the Proposed Project, the City is exploring operating, on a trial basis, a transit-only lane on La Brea Avenue as part of the TMOP for the NFL Stadium. Please see Response to Comment BBB-1 for further information regarding this effort.

Culver CityBus-3 The Proposed Project has coordinated with Metro regarding the relocation of public bus stops on Prairie Avenue and Century Boulevard. Please see Response to Comment Metro-11. The Event TMP provides that the road network in the vicinity of the Proposed Project would be managed by TCOs to provide priority access to the IBEC to transit vehicles and shuttles. As discussed on page 2-44 of the Draft EIR, the Proposed Project includes provision of a curbside pull-out on the east side of South Prairie Avenue adjacent to the Project Site for shuttle vehicles transporting event attendees to/from the Metro Crenshaw/LAX and Green light rail transit lines. Mitigation Measure 3.14-3(f) on page 3.14-211 of the Draft EIR requires that this pull-out be extended to the South Prairie Avenue/West Century Boulevard intersection and that TCOs operate this lane as a queue jumper for shuttle buses departing the shuttle pull-out.

Culver CityBus-4 The comment appears to suggest that the event-day local microtransit service should connect to the proposed shuttle locations at the nearby Metro light rail stations rather than travel directly to the Project Site, presumably with the intent to reduce traffic volumes near the Project Site. While this concept could potentially be considered as part of the Proposed Project TDM Program (see Draft EIR, Section 3.14, Transportation and Circulation, Mitigation Measure 3.14-2(b)), the introduction of a forced transfer into a trip that otherwise by design is intended to be within a radius of approximately six miles surrounding

the Project Site could serve to discourage use of the microtransit service. For this reason, the comment's suggestion to route microtransit to Metro station shuttle sites would not increase the efficiency or effectiveness of the Proposed Project's transit options.

Culver CityBus-5 The Proposed Project TDM Program requires that the Proposed Project provide on-site and/or off-site improvements such as lighting, new benches, and overhead canopies, added bench capacity if needed, and real-time arrival information for an improved user experience for bus stops that are relocated as a result of the Proposed Project (see Mitigation Measure 3.14-1(a) on page 3.14-191 of the Draft EIR, and Mitigation Measure 3.14-2(b) on pages 3.14-195 and 3.14-196 of the Draft EIR). The City agrees that amenities and wayfinding should be incorporated into bus stops.

Culver CityBus-6 The Draft EIR includes a detailed analysis of pedestrian access at the site (see Draft EIR, pages 3.14-132 through 3.14-136, 3.14-248 through 3.14-249). The analysis concludes that, as mitigated, impacts to pedestrian access would not be significant. For additional information on pedestrian access and sidewalk widths, please see Responses to Comments Channel-30 through -33 for a lengthy description of pedestrian facilities including existing and planned sidewalk widths and adequacy of facilities to accommodate major events.

Culver CityBus-7 The West Century Boulevard Improvement Plan recently implemented by the City did not include the provision of bike lanes on West Century Boulevard, conversations with City staff indicate that no bike facilities are planned by the City of Inglewood on streets adjacent to the Project Site, nor would addition of bike lanes on South Prairie Avenue or West Century Boulevard be within the ability of the Proposed Project to implement. As shown in Table 3.14-26 on page 3.14-97 of the Draft EIR, attendee travel mode by bicycle is anticipated to be less than one percent, suggesting that the Proposed Project would not create the need for bike lanes on South Prairie Avenue or West Century Boulevard. E-scooters are not licensed to operate within the City of Inglewood.

Culver CityBus-8 The Proposed Project would include the provision of bicycle parking spaces for employees on the east side of the Arena Site and for patrons in the West Parking Garage. E-scooters are not licensed to operate within the City of Inglewood. There is neither a bike share system operating within the City of Inglewood, nor is implementation of such a system currently proposed by the City.

Culver CityBus-9 As described on page 2-58 of the Draft EIR, the Proposed Project analyzed in the Draft EIR would operate shuttle service that would connect the Project Site to the Metro Green Line Hawthorne/Lennox Station and the Metro Crenshaw/LAX Line La Brea/Florence (Downtown Inglewood) Station. The

transportation analysis in the Draft EIR therefore assumed shuttles to these two stations. The Proposed Project TDM Program, however, would expand on this and provide for three stations to be served, including the Metro Crenshaw/ LAX Line AMC/96th Station (see Mitigation Measure 3.14-2(b) on pages 3.14-195 and 3.14-196 of the Draft EIR). For additional information regarding shuttle service to Metro stations, please see Responses to Comments Metro-5 and Metro-17.

Culver CityBus-10 The Proposed Project TDM Program for daytime and non-event employees would require that the Proposed Project encourage the use of alternative modes of transportation by providing monetary incentives including pre-tax commuter benefits for employees to subsidize transit and/or multi-modal use (see Mitigation Measure 3.14-1(a) on page 3.14-19 of the Draft EIR). The Proposed Project TDM Program for events would require that the Proposed Project encourage the use of alternative modes of transportation by providing monetary incentives such as integrated event and transit ticketing, discounted event tickets with the purchase of a transit pass or proof of a registered TAP card, and pre-tax commuter benefits for employees to subsidize transit and/or multi-modal use (see Mitigation Measure 3.14-2(b) on pages 3.14-195 and 3.14-196 of the Draft EIR).

Culver CityBus-11 The Proposed Project TDM Program for daytime and non-event employees would require that the Proposed Project encourage the use of alternative modes of transportation including public transit through a marketing and outreach campaign and through information services such as an information kiosk or bulletin board providing information regarding public transportation options (see Mitigation Measure 3.14-1(a) on pages 3.14-191 and 3.14-19 of the Draft EIR). The Proposed Project TDM Program for events would require that the Proposed Project encourage the use of alternative modes of transportation including public transit through a marketing and outreach campaign and through information services such as commercials/advertisement on television, website, social media, etc., and an information kiosk or bulletin board providing information regarding public transportation options (see Mitigation Measure 3.14-2(b) on pages 3.14-195 through 3.14-198 of the Draft EIR).

Culver CityBus-12 As discussed on page 2-62 of the Draft EIR, the Proposed Project would provide approximately 60 bicycle parking spaces for employees on the east side of the Arena Site and 23 short-term bicycle parking spaces for patrons in the West Parking Garage. Draft EIR, page 2-62 also notes that a bike valet service could be accommodated in the West Parking Garage if needed. The bike valet service is also included as part of the Proposed Project TDM Program, which states that a bike valet service would be implemented if

needed to accommodate bike parking needs (see Mitigation Measure 3.14-2(b) on page 3.14-197 of the Draft EIR). Bicycle use would be monitored as part of the monitoring element included in the TDM Program.

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Letter Gabrieleno1 (1 of 3)

Letter Gabrieleno1 (2 of 3)

Letter Gabrieleno1 (3 of 3)

Letter Gabrieleno1 Response	**Andrew Salas, Gabrieleno Band of Mission Indians – Kizh Nation** January 14, 2020

Gabrieleno1-1 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 Gabrieleno1-2 and Gabrieleno1-3.

Gabrieleno1-2 The Project Site is within the Ancestral Tribal Territory of the Gabrieleno Band of Mission Indians – Kizh Nation (the Tribe). As described in Draft EIR, Section 3.4, Cultural and Tribal Cultural Resources, and presented comprehensively in Draft EIR, Appendix D, in order to fully comply with the consultation requirements of AB 52, the City submitted letters requesting consultation to five Native American individuals and organizations on the City's AB 52 Notification List on February 12, 2018. The Gabrieleno Band of Mission Indians – Kizh Nation responded (letter dated February 16, 2018 and March 2, 2018) during the 30-day project notification conducted by the City. During the consultation process, the City met or communicated with the Tribe on four occasions: March 21, 2018; March 20, 2019; May 16, 2019; and June 20, 2019.

Through consultation the Tribe provided its knowledge of the Project Site and concerns about the Proposed Project. The City discussed proposed mitigation with the Tribe throughout the consultation process. On May 16, 2019, the City met with Tribal representatives to discuss proposed mitigation measures addressing the potential presence of Tribal resources. The City stated that, as requested by the Tribe, recommended mitigation measures for archaeological and Tribal resources would include Native American monitoring during construction activities that involve ground disturbance. Tribal representatives stated that they were satisfied with this recommended mitigation measure. Tribal representatives also requested that the City add language to the recommended mitigation providing that, if found, artifacts would be repatriated to the Tribe or reburied depending on the type of materials encountered. The Tribe further agreed that, once the City concurs with this request, consultations under AB 52 would be concluded.

In June, 2019, the City and the Tribe agreed upon the recommended mitigation for archaeological and Native American monitoring for ground disturbance, as well as a provision that any artifacts that may be found would be repatriated to

the Tribe or reburied depending on the type of materials encountered. The City documented this mutual agreement in a close of consultation letter on July 15, 2019; this letter is included in Draft EIR, Appendix D.

As required under AB 52, Mitigation Measure 3.4-1, as provided in Draft EIR, Section 3.4, Cultural and Tribal Cultural Resources, incorporates the provisions agreed to by the City and the Tribe through the consultation process. The Tribe and the City have therefore successfully completed the consultation process established by AB 52. The City appreciates the Tribe's participation in this process.

Gabrieleno1-3 This comment is an attachment showing the Bean and Smith 1978 Map which depicts the Gabrieleno Territory, in which the Project Site lies. Please see Response to Comment Gabrieleno1-2 summarizing the result of the tribal consultation between the City and the Tribe.

Additionally, the Bean and Smith 1978 Map is added to Draft EIR, Appendix F.

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Letter Gabrieleno2 (1 of 1)

Letter Gabrieleno2 Response	**Admin Specialist, Gabrieleno Band of Mission Indians – Kizh Nation** March 23, 2020

Gabrieleno2-1 Please see Response to Comment Gabrieleno1-2, which summarizes the results of the Tribal consultation between the City and the Tribe. As discussed therein, consultation between the City and the Tribe was held on March 16, 2019 and consultation was concluded on July 15, 2019.

Letter PETA (1 of 3)

Letter PETA (2 of 3)

Letter PETA (3 of 3)

Letter PETA **James Erselius, Esq., Litigation Counsel, PETA Foundation**
Response March 23, 2020

PETA-1 The Draft EIR evaluation of potential impacts of the Proposed Project on biological resources, including impacts on birds, including migratory birds, and other sensitive animal species, fully complies with the requirements of CEQA. The effects on avian species was addressed in the Environmental Setting as well as in several impacts analyzed in the Draft EIR, Section 3.3, Biological Resources, as described below.

Pursuant to the requirements of CEQA Guidelines section 15125, Draft EIR, Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, pages 3.3-1 through 3.3-10, provides a thorough discussion of the "full environmental context" related to biological resources, including: an overview of the biological resources on the Project Site; typical plant communities and land cover types in the area; common wildlife species found in the area; special status species with the potential to occur in the area; sensitive natural communities in the area; the lack of designated critical habitat, jurisdictional resources, and wildlife movement corridors in the area; and protected trees on the Project Site. In particular, related to issues addressed in this comment letter, on pages 3.3-5 through 3.3-7 of the Draft EIR, the proximity of the Project Site to known wildlife corridors was addressed, and it was noted that in addition to the lack of sensitive natural communities on the Project Site, and the lack of observations or habitat for special-status wildlife species on the Project Site, "[n]o wildlife movement corridors were identified within or immediately adjacent to the Project Site, as the surrounding areas are highly fragmented by urban development and the site itself is largely developed and/or disturbed."

Impact 3.3-1, on page 3.3-13 of the Draft EIR, concluded that the Proposed Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species, including avian species, in local or regional plans, policies, or regulations, or by the CDFW or USFWS.

Impact 3.3-2, on pages 3.3-14 to -15 of the Draft EIR, considered the potential impacts of Project construction and operation, including construction and operational lighting, on avian and other wildlife species. The analysis concluded that "[t]he increased lighting, noise, and general activity generated by the Proposed Project would not significantly affect the activities of birds within and in the vicinity of the Project Site due to its location in a highly urban area with an abundance of existing nighttime lighting sources. Additionally, birds that occur in the area are highly adapted to urbanization and the Proposed Project is

consistent with the urbanized developments that surround the site." Impact 3.3-2 acknowledged the potential for the Proposed Project to adversely affect birds through the removal of trees on the Project Site, and identified Mitigation Measure 3.3-2, establishing the timing and procedures for tree removal while avoiding impacts to resident or migratory birds, which would reduce this impact to a less-than-significant level.

Impact 3.3-4, on pages 3.3-18 to -19 of the Draft EIR, address these issues in the cumulative context, and noted that "While migratory birds may occur within the Project Site, the quality of the habitat within the Project Site is low due to the absence of native habitat and open space, the level of disturbance (existing levels of urban activity and lighting from adjacent uses), and a lack of suitable habitat in the vicinity." The Draft EIR concluded that "in conjunction with cumulative development within the larger region, Project construction or operational activities would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites," and thus this impact would be less than significant.

As such, following a thorough description of the biological characteristics of the Project Site, and a detailed analysis of potential impacts of the Proposed Project on biological resources, including avian species, the Draft EIR concluded that there would be no significant impacts on bird species as a result of the construction and operation of the Proposed Project.

Please see Response to Comment PETA-7 for a discussion of the potential for the Proposed Project to result in adverse impacts to birds, including migratory birds, as a result of collision impacts.

PETA-2 This comment cites a number of studies of avian collisions with buildings. One of the sources cited in the comment is the USFWS 2016 report on "Reducing Bird Collisions with Buildings and Building Glass Best Practices." That document provides important information as it frames the issue of avian mortality due to collisions of birds with building glass and building lighting. It reports that "[g]lass reflectivity and transparency create a lethal illusion of clear airspace that birds do not see as a barrier. During daytime, birds collide with windows because they see reflections of the landscape in the glass (e.g., clouds, sky, vegetation, or the ground); or they see through glass to perceived habitat (including potted plants or vegetation inside buildings) or to the sky on the other side." It also notes that at night birds may be attracted to lighted structures. The report states that "[t]his phenomenon has resulted in a number of concentrated avian mortality events. These mass events are less common at city, office, or residential buildings, but still a possibility under the right weather and lighting

conditions. The majority of collisions with both residential and urban buildings happen during the day, as birds fly around looking for food. Large avian mortalities at night more frequently occur at communication towers, offshore drilling platforms and in other situations where there is a bright light source in a dark area, especially in inclement weather."

The USFWS reports that it is estimated that avian mortality from bird collisions with windows is between 365 and 988 million fatalities, but that "[w]hile most people consider bird/glass collisions an urban phenomenon involving tall, mirrored-glass skyscrapers, the reality is that 56% of collision mortality occurs at low-rise (i.e., one to three story) buildings, 44% at urban and rural residences, and <1/% at high-rises."

Please see Response to Comment PETA-7 for a discussion of the potential for the Proposed Project to result in adverse impacts to birds, including migratory birds, as a result of collision impacts.

PETA-3 The comment references projects constructed in Milwaukee, Wisconsin and New York City that have incorporated design features, such as textured glass, specifically to detract birds from striking buildings.

The comment also references a list of "best practices" to deter bird/building collisions that was developed by the USFWS's Division of Migratory Bird Management. 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. This comment is responded to in Response to Comments PETA-7.

PETA-4 While the comment notes that policy makers in some cities in North America have adopted bird-safe design guidelines or ordinances, neither the City of Inglewood nor any other city in the Los Angeles basin has adopted such requirements or recommendations. 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.

PETA-5 This comment provides a brief summary of the Proposed Project.

PETA-6 As described in Response to Comment PETA-1, the Draft EIR considered the potential for the presence of wildlife corridors, and on page 3.3-7 of the Draft EIR, the Draft EIR concluded that "[n]o wildlife movement corridors were identified within or immediately adjacent to the Project Site, as the surrounding areas are highly fragmented by urban development and the site itself is largely developed and/or disturbed." The Ballona Wetlands Ecological Reserve, noted in the comment as an important natural resource that serves as a stopover for migratory birds, largely oceanic and coastal species, is located approximately

six miles northwest of the Project Site. It is one of a number of important resources for such birds along the California coast, including other important features as San Francisco Bay, Bolsa Chica Ecological Reserve, and others to the north and south. The Ballona Wetlands Ecological Reserve is separated from the Project Site by a continuous pattern of urban development, as well as the Los Angeles International Airport and I-405.

As part of the Draft EIR's analysis, biologists performed on site surveys and literature research to determine whether any sensitive species have been observed at the site. The surveys and research included sensitive and migratory birds. No sensitive bird species were observed during surveys. Based on available habitat, the potential that such species are present is either unlikely or low (see Draft EIR, Appendix E). No evidence is provided in the comment to counter the Draft EIR conclusion that the Project Site is not part of or adjacent to a wildlife movement corridor.

As noted in the USFWS Best Practices report, and described in Response to Comment PETA-2, most bird collisions occur during the day, and those at night occur in greatest numbers in locations where there is a bright light in a dark setting. Development of the Proposed Project would increase the amount of light and glare generated at the Project Site and vicinity, including from building facades, internal night lighting sources visible through windows of building exteriors, new streetlights and pedestrian lights within and adjacent to the Project Site, nighttime lighting of building exteriors and signs, potential video screens, and headlights from project- generated traffic.

Impact 3.3-2 on page 3.3-14 of the Draft EIR describes the environment on and around the Project Site as directly or indirectly illuminated with existing nighttime lighting from streetlights, parking lots, and nearby shopping centers due to the surrounding urban setting. Under the Adjusted Baseline, the Proposed Project would not be expected to appreciably increase the overall amount of lighting in the vicinity when considering existing nighttime lighting generated from other prominent landmarks in the project vicinity, most notably, The Forum, approximately one mile to the north; NFL Stadium and associated development within the HPSP area, north of West Century Boulevard; the Centinela Hospital Medical Center, approximately one-half mile to the northwest; and the City of Inglewood Civic Center that incudes its eight-story City Hall, approximately one mile to the northwest.

The Proposed Project, including associated landscaping (see Figure 2-18 on page 2-42 of the Draft EIR) would not include features that would be intended to attract birds (e.g., wetlands, etc.). This is particularly true for development in the vicinity of major airports such as LAX. In addition, as described below in

Response to Comment PETA-7, the project applicant has committed to implement bird-safe design standards that would avoid up-lighting, use of searchlights, or other bright beacon-type lighting of the Arena Structure. Therefore, the Proposed Project would not introduce a new light source that would present a significant impact on bird collisions in the vicinity when considering other generators of nighttime lighting in the vicinity, as well as the greater Los Angeles basin.

Please see Response to Comment PETA-7 with regard to the potential of the Proposed Project to adversely affect avian mortality.

PETA-7 The Pacific Flyway is a large bird migration corridor between Alaska and South America approximately 4,000 miles in length and 1,000 miles across that encompasses states of the intermountain west and those that border the Pacific Ocean, in the United States including all of California, Oregon, Washington, Idaho, Utah, Nevada, Alaska, and Hawaii, as well as parts of Montana, Wyoming, Colorado, and New Mexico. Bird migration along the Pacific Flyway occurs in a north-south direction. Primary migration routes in California occur along the coast for ocean-going species, and through the Central Valley and eastern deserts of southern California. The Los Angeles basin is one of many large urban metroplexes that occur in the Pacific Flyway along the west coast of the US. Important habitats and stopovers for migrating birds in the Pacific Flyway include protected coastal waters like San Francisco Bay, as well as interior wetlands and waters like the many refuges that exist in the Central Valley and features such as the Salton Sea in the southern California desert. Neither the Project Site nor the developed, urbanized portions of the Los Angeles basin provide important habitat for migrating birds in the Pacific Flyway.

The Project Site is located approximately six miles to the east-southeast of the Ballona Wetlands Ecological Reserve. Neither the position nor the structures associated with the Proposed Project would impede the movement of birds to and from the Ballona Wetlands during their spring and fall migration, especially when considering the six miles of dense development that lies in-between, including Los Angeles International Airport (LAX) and its east-to-west fly zone.

As described in the Draft EIR, the Project Site has been developed since prior to World War II, is surrounded by commercial and residential development, and is currently made up of developed or vacant and disturbed land. Unlike the preserved coastal wetlands of the Ballona Wetlands Ecological Preserve to the northwest and the Bolsa Chica Ecological Reserve to the south, the Project Site does not provide habitat for special-status, resident or migratory birds.

The Proposed Project would include urban-type landscaping, but the landscaping would not attractant to birds. LAX has developed and implements a Wildlife Hazard Management Plan (WHMP) which includes consideration of non-airport land use projects.[27] The Proposed Project would not include the types of habitats that the WHMP identifies as incompatible (e.g., water reservoirs, parks with artificial ponds, wetlands, and wildlife refuges/ sanctuaries). The WHMP notes that "[p]roposed projects that will likely increase bird numbers within flight zones will be discouraged or mitigated to a safe level," and that LAX or the FAA "will provide technical and/or operational assistance in addressing issues or concerns associated with the proposed project or land-use change."[28] LAX did not comment on the Draft EIR and the FAA's comments did not express any concerns regarding the type of landscaping proposed for inclusion in the Proposed Project.

The Loss et al. study[29] is regarded as the most comprehensive analysis on the topic of avian collisions with buildings and refined the annual mortality rate of birds killed by building collisions to between 365-988 million birds from the previously accepted range of between 100 million and 1 billion birds.[30] Loss et al. concluded with a 95 percent confidence interval that high-rise buildings (12 stories or higher), which would include the proposed hotel, caused the lowest total mortality on an annual basis compared with low-rise residential and non-residential buildings (4 to 11 stories tall) and residential buildings (1 to 3 stories tall); however, high rises had the highest median annual mortality rate (24.3 birds per building) versus residential (2.1 birds per building) and low rises buildings (21.7 birds per building).[31] Sheer quantity, density, and the presence of feeders which attract birds are cited as reasons for residential and low-rise buildings killing more birds on an annual basis than high-rises.

Other studies cited by Loss et al. have concluded or agree that avian mortality rates increase with the "percentage and surface area of buildings covered by

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27 Los Angeles World Airports, *Airport Certification Manual, Los Angeles International Airport (LAX) Wildlife Hazard Management Plan*, December 2016.

28 Los Angeles World Airports, *Airport Certification Manual, Los Angeles International Airport (LAX) Wildlife Hazard Management Plan*, December 2016, pages 337-8.

29 Loss, S. R., T. Will, S.S. Loss, and P.P. Marra (2014). Bird-building collisions in the United States: Estimates of annual mortality and species vulnerability. The Condor Vol. 116: 8-23.

30 Klem, D., Jr., 1990. Collisions between birds and windows: Mortality and prevention. Journal of Field Ornithology 61: 120–128.

31 Loss, S. R., T. Will, S.S. Loss, and P.P. Marra (2014). Bird-building collisions in the United States: Estimates of annual mortality and species vulnerability. The Condor Vol. 116: 8-23.

glass,[32,33,34] the percentage and height of nearby vegetation,[35,36] and the amount of artificial night lighting emitted from windows."[37,38] Construction of the proposed Arena and hotel structures would not result in a significant increase in bird collisions when considering the expansive amount of existing development that exists for miles in all directions. Moreover, the proposed Arena Structure would not include large expanses of glass. Rather, the façade and roof of the proposed Arena is designed as a continuous pebble-like form with translucent and opaque panels supported on a grid structure that would create opacity that would minimize the potential for bird collisions.

In addition, the project applicant has committed to implementing bird-safe design criteria as part of the base design of the Arena Structure, and its compliance with requirements to meet (LEED Gold standards. As part of achieving LEED Gold certification, the Arena Structure would include design features that would achieve LEED Bird Collision Deterrence credits created by the United States Green Building Council in partnership with the American Bird Conservancy.[39] Further, the Arena Structure has been designed to address the best practices of the USFWS Division of Migratory Bird Management, the recommendations for bird friendly materials established in the City of New York Building Code, and the design criteria for Building Feature-Related Hazards from the City of San Francisco Planning Department's Design Guide Standards for Bird-Safe Buildings. As the Proposed Project is currently in design development, these goals are influencing the further design evolution of the Proposed Project.

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32 Hager, S. B., B. J. Cosentino, K. J. McKay, C. Monson, W. Zuurdeeg, and B. Blevins, 2013. Window area and development drive spatial variation in bird–window collisions in an urban landscape. PLoS One 8:e53371.

33 Klem, D., Jr., C. J. Farmer, N. Delacretaz, Y. Gelb, and P. G. Saenger, 2009. Architectural and landscape risk factors associated with bird–glass collisions in an urban environment. The Wilson Journal of Ornithology 121:126–134.

34 Borden, W. C., O. M. Lockhart, A. W. Jones, and M. S. Lyons, 2010. Seasonal, taxonomic, and local habitat components of bird–window collisions on an urban university campus in Cleveland, OH. The Ohio Journal of Science 110:44–52.

35 Klem, D., Jr., C. J. Farmer, N. Delacretaz, Y. Gelb, and P. G. Saenger, 2009. Architectural and landscape risk factors associated with bird–glass collisions in an urban environment. The Wilson Journal of Ornithology 121:126–134.

36 Borden, W. C., O. M. Lockhart, A. W. Jones, and M. S. Lyons, 2010. Seasonal, taxonomic, and local habitat components of bird–window collisions on an urban university campus in Cleveland, OH. The Ohio Journal of Science 110:44–52.

37 Evans Ogden, L. J., 2002. Summary Report on the Bird Friendly Building Program: Effect of Light Reduction on Collision of Migratory Birds. Fatal Light Awareness Program, Toronto, ON, Canada.

38 Zink, R. M., and J. Eckles, 2010. Twin Cities bird–building collisions: A status update on ''Project Birdsafe.'' The Loon 82:34–37.

39 U.S. Green Building Council, LEED BD+C: New Construction – v4.1 – LEED v4.1, *Bird Collision Deterrence,* https://www.usgbc.org/credits/new-constrution-core-and-shell-schools-new-construction-retail-new-construction-healthc-212?view=language&return=/credits/New Construction/v4.1, accessed May 4, 2020.

Implementation of these design features would be reflected in a façade and roof structure made of translucent polymer[40] panels with a pattern or metal substructure, along with opaque photovoltaic panels. The intention is to use materials with a goal of achieving a maximum threat factor of 25 pursuant to the American Bird Conservancy Bird Collision Deterrence Material Threat Factor Reference Standard. To be consistent with this standard, the project applicant has committed that all externally visible glass panels would be constructed of fritted glass,[41] which is both energy efficient and is perceived by birds as a solid surface, reducing the potential for fatal collisions.

Consistent with night-lighting standards of the City of San Francisco Planning Department's Design Guide Standards for Bird-Safe Buildings, and consistent with the requirements of the FAA due to the proximity of the Project Site to LAX, the Proposed Project would not include the use of searchlights or up-lighting. Night lighting of the Arena Structure would be partially shielded by the translucent panels in order to help limit the escape of bright lights.

In order to reflect the addition of bird-safe design features to the Proposed Project design, the following changes to the Draft EIR are made.

The following is added to the bottom of Draft EIR, page 3.3-11:

Project Design Features

The Proposed Project would include several project design features to reduce the potential for avian collisions as a result of project design or lighting. Although these features are part of the Proposed Project, these features would be expected to be incorporated as conditions of approval so that they would be enforceable by the City:

Project Design Feature 3.3-1

The project applicant would implement the following project design features. These features would be included in applicable bid documents. Design features would include the following:

- *The Arena Structure would be designed to achieve Leadership in Energy and Environmental Design (LEED) Bird Collision Deterrence credits;*
- *The Arena Structure would be designed to be address the best practices of the United States Fish and Wildlife Service Division of Migratory Bird Management, the recommendations for bird friendly materials established in the City of New York Building Code, and the*

40 Translucent polymer panels would be made of either ethylene tetraflouroethylene (ETFE) or polytetrafluoroethylene (PTFE).

41 Fritted glass is glass that has been fused with pigmented glass particles.

design criteria for Building Feature-Related Hazards from the City of San Francisco Planning Department's Design Guide Standards for Bird-Safe Buildings;

- *The Arena façade and envelope composition would be made of translucent polymer[13] panels with a pattern or metal substructure, along with opaque photovoltaic panels. The materials would be selected with a goal of achieving a maximum threat factor of 25 pursuant to the American Bird Conservancy Bird Collision Deterrence Material Threat Factor Reference Standard. To be consistent with this standard, the project applicant has committed that a large majority of externally visible glass panels would include a fritted finish,[14] which is both energy efficient and is perceived by birds as a solid surface, reducing the potential for fatal collisions; and*

- *The lighting of the Arena Structure would be managed to minimize the potential to attract birds and create the potential for night collisions. Consistent with night-lighting standards of the City of San Francisco Planning Department's Design Guide Standards for Bird-Safe Buildings, and consistent with the requirements of the FAA due to the proximity of the Project Site to LAX, the Proposed Project would not include the use of searchlights or up-lighting. Night lighting of the Arena Structure would be partially shielded by the translucent panels that would help limit the escape of bright lights.*

Commented [U3]: Appears to be missing words; revision is consistent with Summary language.

(Footnote 13: Translucent polymer panels would be made of either ethylene tetraflouroethylene (ETFE) or polytetrafluoroethylene (PTFE).)
(Footnote 14: Fritted glass is glass that has been fused with pigmented glass particles.)

Draft EIR, page 3.3-14, the last paragraph is revised to read:

The Project Site itself is currently indirectly illuminated with existing nighttime lighting from streetlights, parking lots, and nearby shopping centers. As described under Project Design Feature 3.3-1, the Proposed Project would introduce lighting associated with the arena, the outdoor plaza, and the parking areas, as well as an overall increased level of activity and noise. Consistent with night-lighting standards of the City of San Francisco Planning Department's Design Guide Standards for Bird-Safe Buildings, and consistent with the requirements of the FAA due to the proximity of the Project Site to LAX, the Proposed Project would not include the use of searchlights or up-lighting. Night lighting of the Arena Structure would be partially shielded by the translucent panels in order to help limit the escape of bright lights.

While the Proposed Project would result in removal of all existing street and Project Site trees, new landscaping would be installed and replacement of removed trees would occur (see Figure 2-18 on page 2-42 of the Draft EIR). Trees planted on the Project Site would be regularly

maintained during operation of the Proposed Project. The new trees and landscaped vegetation on the Project Site could be illuminated by nighttime lighting and would be located in a highly activated area. The new trees and landscaping may provide suitable foraging and nesting habitat for migratory and resident birds and raptors, however the type of vegetation that would be installed as landscaping at the Proposed Project would not fall into the categories of incompatible land uses in the Los Angeles International Airport Wildlife Hazard Management Plan.[15]

(Footnote 15: Los Angeles World Airports, *Airport Certification Manual, Los Angeles International Airport (LAX) Wildlife Hazard Management Plan*, December 2016, pp. 337-8.)

The proposed hotel structure could be up to 12 stories. As noted above, the Loss et al. study concluded that high-rise buildings of 12 or more stories caused the lowest mortality compared with low-rise residential and non-residential structures. Although less detail currently exists regarding the potential design of the proposed hotel, as indicated in Mitigation Measure 3.2-1(c), the design of the proposed hotel would be prohibited from using reflective glass that exceeds 50 percent of any building surface and on the bottom three floors, mirrored glass, or black glass that exceeds 25 percent of any surface of any building, which would further minimize the potential for bird collisions with the hotel.

In summary, although the Project Site, like the entire western US, is located within the Pacific Flyway, there is nothing about the characteristics of the Project Site or vicinity that would be attractive to migrating birds. The proposed use of the Project Site is consistent with the surrounding environment and would not result in habitat modifications that would attract birds to the Project Site or cause a species, including migratory birds, to drop below self-sustaining levels (see Impact 3.3-1 on page 3.3-13 of the Draft EIR). The proposed Arena and hotel structures would be designed so as to avoid creating a hazard for migrating birds utilizing the Ballona Wetlands. While compared to the existing vacant and underdeveloped conditions on the Project Site, the development of new structures on the Project Site could negatively affect birds by creating a potential collision hazard, any such affects, should they occur, would not be substantial. Moreover, implementation of bird safe practices consistent with the LEED Bird Collision Deterrence credit system, the USFWS Division of Migratory Bird Management best practices, the recommendations for bird-friendly materials established in the City of New York Building Code, and the design criteria for Building Feature-Related Hazards from the City of San Francisco's Design Guide Standards for Bird-Safe Buildings would avoid the creation of any significant impacts on resident or migratory bird species. Neither this comment, nor other comments in this letter, provide evidence to support a conclusion that the Project Site or the design of the Proposed Project would result in a significant increase in bird collisions and associated avian mortality.

As such, impacts are less than significant with regards to Criterion 1 and 4 of the Draft EIR's CEQA Appendix G thresholds for Biological Resources and no further analysis is needed.

PETA-8 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 Channel (19 of 19)

Letter	**Jamie T. Hall, Channel Law Group, LLP**
Channel	March 24, 2020
Response	

Channel-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 Channel-2 through Channel-48.

Channel-2 Draft EIR, Chapter 2, Project Description, provides detailed scaled diagrams of the Proposed Project generated by the project architects.[42] The Site Plan (see Figure 2-7 on page 2-19 of the Draft EIR) is scaled at 1 inch equals 200 feet, and depicts building shape and placement on the Project Site. The Site Plan required presentation at that scale in order to show the large, multi-part site all on one figure, allowing the reader to understand the physical relationship of all of the buildings and structures being proposed. Yet, the use of a scaled drawing provides a clear and precise depiction of the relationship of the proposed structures to the property boundaries, addressing the issue of "setbacks" referred to in the comment.

The Draft EIR includes seven architectural floor plans that depict the physical layout of each floor of the structure, including the Event Level (Figure 2-8), Club Level (Figure 2-9), Plaza Level (Figure 2-10), Suite Level (Figure 2-11), Premium Level (Figure 2-11), Mechanical Level (Figure 2-13), and Terrace Level (Figure 2-14). Each of these floor plans provides sufficient detail for the public and decision makers to understand the physical arrangement of uses and space that is proposed in the Arena Structure. These diagrams also show the relationship of the Arena Structure to the boundaries of the Project Site, providing and in-depth understanding of the precise location of the Arena Structure, including setbacks and sidewalk widths that would be provided.

Figure 2-15 presents two structural cross-sections which depict the precise height and shape of the ellipsoid-shaped structure and grid-like façade and roof, and physical relationship to uses on each building floor. The cross-sections are of sufficient detail to provide elevations of each floor to the inch.

[42] The scale of original drawings is shown on figures, but reduced for the purposes of presentation in the Draft EIR. However, the accuracy of the scaled drawings allows for precise determination of distances on the drawings.

Finally, two to-scale renderings present the overall visual characteristics of the proposed Arena Structure, both from an aerial axonometric view (Figure 2-16) and a near street level view (Figure 2-17). These renderings of the Arena Structure provide an understanding of the relationship of the building to the street, as well as to nearby existing uses, the physical landscaping that is proposed, and the relationship of the Arena Structure and plaza to West Century Boulevard.

Other detailed depictions of the Proposed Project include a Preliminary Landscape Plan (Figure 2-18), Noise Barrier Locations (Figure 2-19), Sign Locations (Figure 2-20), Temporary and Permanent Bus Stop Relocations (Figure 2-22), Crosswalk Locations (Figure 2-23), and Bicycle and Electric Vehicle Parking diagram (Figure 2-24, which also shows the location of electric vehicle charging spaces, long- and short-term bicycle parking, and a potential bike valet location). Each of these diagrams is at a sufficient scale to allow the public and decision makers to understand the proposed physical relationship of the aspects of the Proposed Project, and to support the environmental analysis of the breadth of environmental topics considered in the Draft EIR.

In addition to drawings of the Proposed Project buildings, several detailed diagrams are provided depicting proposed utility improvements. The utility plans provided include Potable Water Infrastructure (Figure 2-26), Well Transmission Infrastructure (Figure 2-27), Reclaimed Water Infrastructure (Figure 2-28), Wastewater Infrastructure (Figure 2-29), Drainage Infrastructure (Figure 2-30), and Dry Utilities (Figure 2-31). Each of the utility diagrams are on the same 1-inch-equals-100-feet scaled base map (to provide consistent understanding of the physical relationships). All of the Wet Utilities diagrams (Figures 2-26 through 2-30) provide detailed, to-the-inch, sizing of utility lines, as well as locations of connections to existing utility lines. The Dry Utilities diagram shows the precise locations of existing and planned improvements to electrical, natural gas, and telecommunications lines, including such features as existing and proposed electrical vaults, connections to existing lines, the locations of existing and proposed trenches, as well as underground and above ground lines to be removed and constructed.

As discussed above, the diagrams included in Chapter 2, Project Description, provide a detailed description of the physical relationship of the Proposed Project structures to property boundaries, City streets, and nearby uses.

The comment asks for information concerning the extent to which the Proposed Project complies with required yard setback requirements under the City's Municipal Code. Under existing conditions, the following zone districts exist on the Project Site: M-1L (Limited Manufacturing), C-2A (Airport Commercial), P-1 (Parking), R-2 (Residential Limited Multifamily), and R-3 (Residential

Multiple Family). As proposed, the Project Site would be zoned M-1L and C-2A, [43] with a Sports and Entertainment Complex (SE) overlay designation that would, among other things, eliminate the required front and side yard requirements that currently exist in the M-1L zone (there are no required setback or yard requirements in the C-2A zone), other than current setbacks required for hotels pursuant to section 12-16.1 of the City's Municipal Code.[44] As such, a discussion of yard requirements in the context of zoning would be irrelevant to the Project Description and to the analysis of the environmental impacts of the Proposed Project. Throughout the EIR, where issues for which distance and precise location is required (e.g., noise, shade and shadow, views, sidewalk widths, etc.), the scaled diagrams provided in Draft EIR, Chapter 2, Project Description, were used as the basis of the analysis. Thus, the analyses in the Draft EIR reflect the proposed physical location of buildings in relation to streets, sidewalks, and other nearby uses; the environmental effects of these physical relationships are not affected by the consistency or inconsistency of the Proposed Project with existing zoning regulations.

While the scaled diagrams presented in the Project Description are described as "conceptual," that description is simply to reflect that they have been prepared prior to detailed architectural construction drawings, which is typical of the level of design during the timeframe of preparation of an EIR. The Draft EIR studied the maximum building envelopes identified in the conceptual site plans. As with any project, the final design of structures may include minor variations to the precise location of structures compared to the conceptual site plans, but those variations would not involve significant changes in location or any increase in height or maximum square footage compared to the conceptual site plans. There is no evidence in the record to support the suggestion that the buildings could be adjusted in location by up to 180 feet. If the Proposed Project is approved by the City Council, it would be the responsibility of the City staff to review the final plans submitted for building and other permits, and to assess the consistency of those final plans with the characteristics of the Proposed Project presented in Draft EIR, Chapter 2, Project Description. ~~Nevertheless, if the Proposed Project is approved by the City Council, it would be the responsibility of the City staff to review the final plans that are submitted for building and other permits, and to assess their consistency with the characteristics of the Proposed Project presented in Draft EIR, Chapter 2, Project Description.~~

Commented [U4]: Duplicative language.

[43] City of Inglewood Municipal Code, Chapter 12, Article 7.1, Section 12-24.12, and Article 11.1, Section 12-32.13.
[44] City of Inglewood Municipal Code, Chapter 12, Article 1.1, Section 12-16.1 provides for a required 15-foot setback from any public street and 5 feet from any alley right-of-way, with a setback increase of 2 feet for every story above two stories.

Channel-3 Draft EIR, Chapter 2, Project Description, Subsection 2.5.9, Construction and Phasing, provides relevant information about grading and excavation, reporting that "[t]he Proposed Project would export approximately 296,915 cubic yards of soil during grading and excavation activities" (see Draft EIR, page 2-80). The provision of a grading plan is relevant in projects where cut-and-fill techniques are used to balance the management of on-site soils, avoiding the off-site transport of excavation spoils. In the case of the Proposed Project, Figure 2-15, Conceptual Arena Structure Sections, on page 2-37 of the Draft EIR, provides a clear and precise depiction of the depth of excavation (wherein the Event Level elevation is reported at 58.5 feet, 32-feet below the Plaza Level which is at street grade. Discussion on page 2-84 of the Draft EIR explains that conservatively "[e]xcavation depths on the Arena site would be at a maximum of 35 feet below ground surface to accommodate the Arena bowl. Excavation activities would result in up to approximately 150 haul truck trips per day."

CEQA Guidelines section 15147 provides that '[t]he information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public." Consistent with this Guideline, relevant summarized information was provided in the body of the EIR. Guideline 15147 goes on to recommend that "[p]lacement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR."

Consistent with CEQA Guidelines section 15147, additional detailed information was presented in relevant Draft EIR appendices. For example, Draft EIR, Appendix J includes a detailed diagram of depths and distances used in the construction noise modeling. This diagram (see Draft EIR, Appendix J, page 925) indicates that the modelled depth of excavated area for the Arena bowl would extend 35 feet below grade, and the distances from the edge of the excavated bowl and the property boundary would range from 20-feet at the closest, to 125 feet along the southern edge of the excavated bowl. This same detailed diagram also identifies the type of equipment to be used in different construction subareas of the site: Daytime Construction Light Activity Area, Daytime Construction Activity Area, Extended Hours Activity Area and Staging/Activity Area, Extended Hours Construction Activity Area, and Well Location Activity Area. In each area, the number and type of equipment, time of day or night, and duration of hours of use are provided.

Thus, extensive information about the grading and excavation activities that would take place with the Proposed Project was included in the EIR. Consistent with the CEQA Guidelines, general, summarized information was provided in

Chapter 2, Project Description, and a greater level of detailed information was provided in the Appendices. All of this data was available for review during the 89-day public review and comment period provided for the Draft EIR.

Channel-4 As stated in Draft EIR, Section 3.11, Noise and Vibration, page 3.11-63 the estimated type, number, and duration of use of construction equipment was provided by the project applicant based on input from its contractor, and was utilized for the noise analysis. A complete list of the proposed construction equipment, including excavators, graders, scrapers, and cranes, is provided in Draft EIR, Appendix D.3-4 Construction Resource Loaded Schedule in the Draft EIR. Backhoes are included in the schedule collectively with tractors/loaders/backhoes, all of which produce equivalent noise levels. Construction noise levels for the Proposed Project were estimated using the FHWA Roadway Construction Noise Model (RCMN) reference noise levels, as shown in Table 3.11-9 (see Draft EIR, page 3.11-63). Please also see Response to Comment Channel-3.

Channel-5 The comment states that structures could be moved so that they are located directly on property lines. This statement is incorrect. The Draft EIR studied the maximum building envelopes presented in the Conceptual Site Plan (see Figure 2-7 on page 2-19 of the Draft EIR). As with any project, the final design of Proposed Project structures may include minor variations to the precise location of structures compared to the conceptual site plans, but those variations would not involve significant changes in location or any increase in height or maximum square footage compared to the conceptual site plans. If the Proposed Project is approved by the City Council, it would be the responsibility of the City staff to review the final plans submitted for building and other permits, and to assess the consistency of those plans with the characteristics of the Proposed Project presented in Chapter 2, Project Description. Please also see Response to Comment Channel-2.

For example, the comment states that the West Parking Garage could be constructed directly atop the western boundary of the site, with no setback. This statement is incorrect. As shown on the Conceptual Site Plan (see Figure 2-7 on page 2-19 of the Draft EIR), an access road is provided from West Century Boulevard along the western boundary of the Project Site. The footprint of the West Parking Garage would be set back from the western boundary in order to provide sufficient space for this access road. The Draft EIR includes a description of this access road (see Draft EIR, page 2-57). Similar information is provided concerning other access roads proposed on the Project Site. For these reasons, the assertion in the comment that the Draft EIR does not contain sufficient information for the reader to understand the physical location and

relationship of the Proposed Project structures, roads, and other features is incorrect.

Channel-6 The comment asserts that the Draft EIR contains insufficient detail regarding the sidewalk along the east side of South Prairie Avenue, immediately adjacent to the west side of the proposed Arena. The Draft EIR contains sufficient information concerning the widening of turn lanes along the east side of South Prairie Avenue and resulting sidewalk widths. This information is in both the Draft EIR Appendices, and in the text of the Draft EIR. For example, with respect to sidewalk widths along South Prairie Avenue, Figure 3.14-10 depicts pre-event garage access and traffic management in the vicinity of the Arena (see Draft EIR, page 3.14-107) The figure shows the dedicated bus turn-out and right-turn lane on the east side of South Prairie Avenue. The figure also shows where traffic control officers and event staff would be placed to manage traffic and pedestrian flows prior to events. Similar figures are provided for post-event traffic management, and for managing different types of events and scenarios. The transportation analysis includes a discussion of the extent to which sidewalks would be of sufficient widths to accommodate pedestrian flows of event patrons. The analysis specifically addresses whether providing a dedicated right-turn lane on northbound South Prairie Avenue at West Century Boulevard would create problems for pedestrians. Draft EIR, page 3.14-217, states:

> The Proposed Project site plan would provide sufficient area to allow for widening Prairie Avenue to provide a northbound right-turn lane. However, it would cause the sidewalk along the east side of Prairie Avenue between the plaza entry/exit and Century Boulevard to be reduced from 20 to 8 feet in width. This is considered a potentially significant secondary impact because it could cause post-event pedestrian flows to exceed the sidewalk capacity (thereby resulting in walking in the street). In response to this potential condition, the Event TMP (Mitigation Measure 3.14-2(a)) includes post-event pedestrian wayfinding guidance, which if followed, would result in the majority of post-event attendees using the primary plaza exit to access the east leg crosswalk at the Prairie Avenue/Century Boulevard intersection, thereby limiting flows on this sidewalk to match its available width.

The issues to be included in the Event TMP are set forth in Mitigation Measure 3.14-2(a). They include: "*b) Pedestrian Flows: Through pedestrian flow management, pedestrians do not spill out of sidewalks onto streets with moving vehicles, particularly along portions of West Century Boulevard and South Prairie Avenue adjacent to the Project*" (see Draft EIR, page 3.14-193). A Draft Event TMP is included in Draft EIR, Appendix K.4. Thus, the comment that the Draft EIR does not address this issue is incorrect.

For additional information on pedestrian flow on South Prairie Avenue sidewalks, please see Response to Comment Channel-32.

Channel-7 As described above in Responses to Comments Channel-2 and Channel-3, the Project Description for the Proposed Project is both sufficiently detailed to meet the requirements of CEQA and sufficiently summarized with additional details included in the Draft EIR Appendices to meet the directives of CEQA Guidelines section 15147. More specifically, the Project Description meets the requirements of CEQA Guidelines section 15124. That Guideline requires that an EIR Project Description "shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact." The information required includes:

- The precise location and boundaries of the proposed project;
- A statement of objectives of the proposed project;
- A general description of the projects characteristics; and
- A description of the intended uses of the EIR.

As described in Response to Comment Channel-2, all of this information was provided as necessary in the Project Description.

As discussed above under Responses to Comments Channel-2 and Channel-5, the Draft EIR studied the maximum building envelopes identified in the conceptual site plans. As with any project, the final design of structures may include minor variations to the precise location of structures compared to the conceptual site plans, but those variations would not involve significant changes in location or any increase in height or maximum square footage compared to the conceptual site plans. If the Proposed Project is approved by the City Council, it would be the responsibility of the City staff to review the final plans submitted for building and other permits, and to assess the consistency of those plans with the characteristics of the Proposed Project presented in Chapter 2, Project Description. The comments do not demonstrate the inadequacy of the Project Description in the Draft EIR. Rather they focus on design details that the Draft EIR included, notwithstanding the comment's assertion to the contrary. Pursuant to CEQA Guidelines section 15151, "[a]n EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible…The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure." The Draft EIR Project Description meets the letter of the requirements of Guideline 15124; is accurate, stable, and finite; and represents

an adequate, complete, good faith effort at full disclosure of the Proposed Project.

Channel-8 As described in Response to Comment Channel-3, the depth of excavation would be approximately 35-feet below ground surface. This depth would accommodate the event floor level of 32.5-feet below grade, plus another 2.5 feet of depth. This is consistent with the recommendations of the Preliminary Geotechnical Report included in the Draft EIR as Appendix H.

The comment misinterprets the findings of the Preliminary Geotechnical Report regarding recommended depth of excavation (see Preliminary Geotechnical Report pages 20-21). For the Arena Structure, the recommendations on page 20 are that "the arena slab should be underlain by at least 2 feet of granular fill…" The planned depth of excavation of 35 feet would accommodate the placement of fill. It is noted that another recommendation for the Arena excavation is that "[a]ll fills should extend a minimum 5 feet beyond the structure footprint." This recommendation is not for greater depth, but that the excavations should extend horizontally at least 5 feet from the footprint of the Arena Structure.

On page 21, the Preliminary Geotechnical Report includes recommendations for the Practice Facility and South Parking Structure, and for Retail Buildings and Other Near-Grade Structures. For these buildings, which are planned to be constructed with more limited excavations than the Arena Structure, the recommendation is that "[a]ll fills should extend a minimum 10 feet beyond the structure footprint." As with the 5 horizontal feet recommendation for the Arena Structure, the 10-foot recommendation relates to the area of horizontal excavation beyond the structure footprint for the Practice Facility and South Parking Structure, and Retail Buildings.

Thus, it appears that the comment includes a misinterpretation of the Preliminary Geotechnical Report and does not identify an inconsistency in the Project Description. As such, the Draft EIR Project Description is accurate and complete, and does not underestimate or provide misleading information about the depth of excavation planned for the Proposed Project.

Channel-9 Please see Responses to Comments Channel-2 and Channel-10.

Channel-10 As stated on page 3.1-18 of the Draft EIR, the evaluation of Proposed Project impacts related to shade and shadow are based on the shade and shadow study prepared for the Proposed Project, which in turn is based upon the diagrams and other project characteristic information presented in Draft EIR, Chapter 2, Project Description. The Project Description provides detailed scaled diagrams of the Proposed Project generated by the project architects, including a conceptual site plan (see Figure 2-7 on page 2-19 of the Draft EIR) that depicts

building shape and placement on the Project Site; seven floor plans that depict the physical layout of each floor of the structure; two structural cross-sections which depict the height and physical relationship to uses on each building floor; and two renderings which present the overall visual characteristics of the proposed Arena Structure. While the scaled diagrams are characterized as "conceptual," that description is simply to reflect ~~characterization reflects~~ that they have been prepared prior to detailed architectural drawings, which is typical of the level of design during the timeframe of preparation of an EIR. The Draft EIR studied the maximum building envelopes identified in the conceptual site plans. As with any project, the final design of Proposed Project structures may include ~~There may be some~~ minor variations to the precise location of structures compared to the conceptual site plans, but ~~in the precise metrics of the final designed buildings, those these~~ variations would not involve significant changes in location or any increase in height or maximum square footage compared to the conceptual site plans. ~~likely be measured in a few feet or inches, and T~~ there is no evidence in the record to support the suggestion that the buildings could be adjusted in location by up to 180 feet. ~~Nevertheless,~~ if the Proposed Project is approved by the City Council, it would be the responsibility of the City staff to review the final plans that are submitted for building and other permits, and to assess their consistency with the characteristics of the Proposed Project presented in Chapter 2, Project Description.

Commented [U5]: Changes suggested for consistency with more precise language in other responses.

The comment references "modified project scenarios" that appear to have been hypothesized by the commenter and are not reflective of the Proposed Project. Because these "modifications" have been hypothesized by the commenter, and are not reflective of the Proposed Project that has been proposed by the project applicant, the analysis of shade and shadow impacts of non-proposed modifications to the Proposed Project would be entirely inappropriate.

Channel-11 As discussed in Responses to Comments Channel-2 and Channel-10, above, the "modified project scenarios" hypothesized in the comment are not being proposed, would not be consistent with the Project Description text and figures, and are therefore not part of the Proposed Project analyzed in the Draft EIR.

Channel-12 Please see Responses to Comments Channel-2, Channel-7, and Channel-10.

Channel-13 The construction and operational noise analyses are based on conservative assumptions about the physical location of noise-generating activities during each phase of the Proposed Project, and not specifically on zoning-defined building setbacks, as described further below.

For the construction noise analysis, noise-generating construction equipment are allocated to different construction zones within the Project Site based on input from the project contractor, and then assumed to operate up to the worst-case boundary of that zone, including in some cases the fence-line of the Project Site immediately adjacent to noise-sensitive receptors.[45] As stated on page 3.11-64 of the Draft EIR, under Methodology and Assumptions, the calculated combined noise levels (Leq) from the worst-case mix of equipment at each location within the Project Site are modeled as area sources, which accounts for noise generated at the project boundary. Any other potential building or construction setbacks have not been accounted for to ensure a worse-case construction noise analysis.

Commented [U6]: Revise footnote font size.

Similarly, operational noise levels presented in the Draft EIR are calculated based on reasonable worst-case assumptions for where on-site operational activities would occur and using conceptual building placement and massing presented in the Project Description.

Accounting for any further setbacks in construction and or operational activity would increase the distance of project noise sources from neighboring receptors and potentially result in lowered noise levels. Therefore, the conservative nature of the construction and operational noise impact analyses ensures that the maximum potential impacts are identified and avoided or substantially lessened to the extent feasible through implementation of mitigation measures.

Channel-14 As discussed above, to ensure a conservative analysis, construction setbacks within identified construction zones are not factored in to the construction noise model. As discussed in Response to Comment Channel-13, construction activity (which includes a worst-case mix of construction equipment) is assumed to operate up to the boundary of a construction zone, in some cases up to the fence line of the Project Site.

The comment refers to Figure 3.11-12 (see Draft EIR, page 3.11-144) to suggest that receiver distances are not properly measured in the construction noise analysis. The purpose of Figure 3.11-12 is to show operational noise contours, not to identify any receiver locations or to be used in reference to the construction noise analysis. Construction noise impacts at each modeled receiver are shown on Figure 3.11-5 (see Draft EIR, page 3.11-81), which depicts the location of all modeled receivers within each receptor group. As can be seen on Figure 3.11-5, modeled receiver points for first floor receivers are presented on the shared property lines of these receptors and the Proposed

[45] A map of construction activity areas, including location within the project site, type, hours, and duration of activities, including anticipated numbers and type of equipment, is presented in Draft EIR, Appendix J, Noise, page 925.

Project. Similarly, all modeled receiver locations are shown to be accounted for along the receptor property lines nearest to the Project Site. Therefore, the distances to receptors are properly accounted for and no other setbacks within construction zones are assumed in the analysis.

Channel-15 The Proposed Project would include the installation of permanent and temporary sound walls that would provide the greatest noise reductions to the receptors located nearest to those sound walls. As discussed in Response to Comment Channel-13, construction activity (which includes a worst-case mix of construction equipment) is assumed to operate in construction zones up to the fence line of the Project Site. Construction noise modeling assumes an area filled with several pieces of construction equipment that would operate within a confined area/construction zone during each construction phase.

Sound walls to be constructed along the shared boundary between 10204 South Prairie Avenue (Receptor 11) and the Project Site are accounted for in the construction noise model. When a sound wall is placed close to a source or a receiver, its effectiveness increases for a ground-floor noise generator and/or a ground-floor receiver. Because the proposed sound walls would be placed along the shared property line, they would be most protective for receivers close to the property line, and would have the most mitigation efficacy for construction equipment operating nearest the property line.

As discussed on pages 3.11-16 and 3.11-17 of the Draft EIR, ambient noise measurement M1 represents the ambient noise level at receptor R11. As shown on Table 3.11-1 (see Draft EIR, page 3.11-19), the ambient noise level at this receptor location (R11) is relatively high with a daytime average of 65.4 dBA Leq and a 24-hour average of 69.8 dBA CNEL; with the attenuation effect of a sound wall included, project-related construction noise levels would be attenuated so that they would not exceed the ambient noise levels at Receptor 11 location by 5 dBA or more, and the noise impact at this receptor would be less than significant.

With regard to the outdoor stage and restaurant, the locations of operational noise sources are modeled based on site plans included in the Project Description (see Figure 2-7 on page 2-19 of the Draft EIR) under worst-case assumptions for noise levels generated. Therefore, the assertion that the outdoor stage and restaurant could be constructed closer to the receptor than assumed in the model is not based on any evidence in the record.

For additional discussion of the level of detail of the Project Description, please also see Responses to Comments Channel-2 and Channel-10.

Channel-16 The supposition in the comment, that the South Parking Garage could be built up to the south property boundary of the Arena site, is inaccurate and misleading, and would be inconsistent with the Project Description presented in Chapter 2. There is no evidence in the record to suggest or support the supposition that the South Parking Garage could be shifted to be located contiguous with the south property boundary. To suggest that because the Project Description does not contain a textual requirement for a setback of at least 40 feet from the south property boundary requires that the EIR analyze a project that deviates from the Proposed Project described within the Project Description, and ignores the fact that the project description and the drawings that have been submitted identify the location of the proposed South Parking Structure. To the contrary of the suggestion in the comment, there is simply no requirement for a Project Description to explicitly prohibit everything other than the characteristics of the Proposed Project described within the Project Description.

CEQA Guidelines section 15384 states that substantial evidence includes "facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts." To the contrary, Guideline 15384 affirmatively states that:

> *Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence.*

The hypothetical opinions presented in the comment are unsubstantiated opinion, are not supported by facts, and thus do not represent substantial evidence pursuant under CEQA.

For additional discussion of the level of detail of the Project Description, please see Responses to Comments Channel-2 and Channel-10.

Channel-17 Please see Responses to Comments Channel-8 and Channel-13.

Channel-18 Please see Response to Comment Channel-15.

Channel-19 Operational noise levels associated with the proposed rooftop restaurant space were modeled based on preliminary conceptual design plans, which resulted in a conservative calculation of noise impacts. Specifically, the analysis presented in the Draft EIR relies on a conservative calculation regarding maximum occupancy, does not take into account any noise-dampening effect of walls or partitions around the rooftop restaurant, combined with worst-case assumptions regarding the number of patrons generating noise simultaneously, and a reasonable assumption concerning the level of conversation. The combination of

these three factors resulted in the noise levels from the rooftop restaurant being conservatively predicted, and not to conceal future noise levels as the comment asserts.

As discussed on pages 3.11-72 and 3.11-73 of the Draft EIR, because a specific tenant has not been identified, and, thus, tenant improvements based on restaurant design were unavailable at the time of the analysis, the amount of the 15,000-square foot (sf) restaurant space that would be rooftop outdoor seating and/or gathering space is unknown. Thus, the Draft EIR relied on a worst-case estimate of space occupancy – that all 15,000 sf of the restaurant would be open-air, outdoor seating where human conversation would generate noise. This calculation is unrealistically worst-case because some portion of the total 15,000 sf, under any restaurant configuration, would be required for "back of house" uses such as the kitchen/food preparation area, storage, lobby/waiting area, stairs and/or elevators, office, and restrooms. Nevertheless, in the effort to generate a conservative assessment of potential noise effects of the rooftop restaurant, the Draft EIR made a worst-case assumption that all 15,000 sf of the restaurant could be used for patrons, resulting in a maximum occupancy of 1,000 people.

In addition, any restaurant uses would include physical features such as enclosures, walls, and other features which serve to obstruct sound transmission. However, because the location, height, and size of these features is not known, they were not included in the analysis. Thus, the analysis of noise impacts presents a worst-case assumption that the propagation of noise from the rooftop area would be unabated in all directions. Further, although Mitigation Measure 3.11-2(a) in the Draft EIR includes the requirement to develop an Operations Noise Reduction Plan that considers strategies such as "[e]nclos[ing] the rooftop restaurant space with a material that would serve as a noise barrier such as glass," the dampening effect of glass or solid walls are not included in the quantitative calculation of impacts. Thus, all of the assumptions related to the design of the physical space of the rooftop restaurant were not just conservative, but were a theoretical worst-case.

Conservative assumptions also are made regarding the number of people speaking at the same time at the restaurant. Typically, human conversation consists of one person speaking and one or several person(s) listening. However, as an additional worst-case assumption, the Draft EIR assumed that the full capacity of 1,000 people would be speaking simultaneously.

Added to worst case assumptions about the physical space and the number of people speaking simultaneously, the Draft EIR appropriately assumed that the volume of speech at the restaurant would be "normal," a level consistent with

the analyzed future use of the space. The comment posits that the Draft EIR should have assumed a "raised" or "loud" speech volume. In light of the worst-case assumption that all patrons would speak at once coupled with the worst-case assumption that all 15,000 square feet of the proposed restaurant use would consist of open-air seating with a capacity of 1,000 patrons, the City's noise expert determined that an assumed speech volume of "normal" for all 1,000 patrons is appropriate and still results in a conservative analysis that eliminates the potential that noise levels from the rooftop restaurant are understated. Nonetheless, Mitigation Measure 3.11-2(a) has been refined to better clarify the intent and efficacy of the Operations Noise Reduction Plan. Please see Response to Comment Channel-22, below, for the modified measure.

As discussed on page 3.11-7 of the Draft EIR, a change in noise level of 1 dBA in a controlled laboratory environment is not perceivable and a change in noise level of 3 dBA outside of a controlled laboratory is considered just-perceivable. Therefore, a 1.8 dBA increase is not a perceivable change in noise level and therefore not a substantial change in the severity of the impact. Impacts would remain less than significant where impacts were determined to be less than significant in the Draft EIR and where impacts were determined to be significant in the Draft EIR, the calculated increase in the severity of that impact would be insubstantial.

Channel-20 The Draft EIR properly accounts for appropriate speech volumes in the Plaza and describes modeling assumptions in Draft EIR, Section 3.11, Noise and Vibration. The comment references an assumed noise level of 76 dBA for Plaza speech volume on page 3.11-32 of the Draft EIR, which is a discussion of potential noise levels at the Hollywood Park plaza (a part of the Adjusted Baseline), and is not an assumption that is applicable to the Proposed Project. Draft EIR, page 3.11-72 includes a discussion of the methodology and assumptions for modeling crowd noise in the Plaza area of the Proposed Project. These assumptions include that the back of the outdoor stage would be completely enclosed with a sound shell extending up to 30 feet in height, and that five speaker locations would extend from the top of the 30-foot sound shell to the ground floor.

The comment asserts that only raised voice volume (65 dBA) was used in the modeling for all attendees at the Plaza. However, as discussed on page 3.11-72 of the Draft EIR, the modeling for crowd noise in the Plaza area assumes a reasonable mix of three different voice levels: 1/3 raised – 65 dBA; 1/3 loud – 76 dBA; and 1/3 shout – 89 dBA). Therefore, the Draft EIR properly describes modeling inputs and assumptions and does not underestimate the operational impacts of the Proposed Project.

Channel-21 The noise modeling performed for the Draft EIR properly accounts for noise propagation impacted by the design and proposed arrangement of the Arena, surrounding Plaza structures, other project structures such as the parking garages, as well as other structures in the vicinity of the Project Site. The particular accounting for the proposed design of the Arena included accurate assumptions regarding the structure height, building shape, locations of entries and exits, and site grading and topography. The analysis also takes into account the capacity of the proposed Arena for all types of anticipated events, noise anticipated from those crowds, and specific locations of event stages in the Arena and in the Plaza. The model inputs include details about the topography of the surrounding area, as well as surrounding existing and proposed building heights, locations, and site coverage under both Adjusted Baseline and Cumulative conditions. Further, the noise model accounted for factors such as the barrier/shielding effect, basic ground effect, and air absorption. All of the assumptions are presented and explained in Draft EIR, Appendix J.

The comment asserts that the orientation of the Proposed Project structures would funnel noise towards receptors to the northeast. This assertion is not correct. As explained in Draft EIR, Section 3.11, Noise and Vibration, page 3.11-71, the back of the outdoor stage, which would sit adjacent to the northeast off-site noise-sensitive receptors, would be enclosed with a sound shell extending up to 30 feet in height. Additional buildings located on both sides of the stage would be oriented so that, together with the sound shell on the back of the stage, the propagation of the majority of the stage noise toward offsite receptors to the northeast would be blocked.

As proposed, the Plaza entrance opening would be located to the northwest, with buildings proposed on both sides of the Plaza angled southeasterly towards the Arena. The model correctly accounts for this proposed orientation of these structures, and that the front facades of these buildings would not be flat, smooth surfaces and therefore would not reflect sound in one direction. Sound waves contacting the surface would be deflected in a number of directions, and therefore, would not result in any funneling effect through the opening to the northwest. The results of the Draft EIR demonstrate that both direct sound and reflected sound are properly accounted for in the modeling in all directions.

The modeling of the Proposed Project properly accounts for the shielding and reflective properties of the Proposed Project buildings. ~~The proposed 30-foot high sound shell would enclose the back of the stage minimizing impacts to the noise-sensitive receptors to the northeast of the proposed Plaza.~~ The Draft EIR does not fail to consider noise propagation impacted by the arrangement of surrounding structures, as the comment asserts. Therefore, the noise modeling in

Commented [U7]: Already stated above.

the Draft EIR does not underestimate the potential noise impacts from the proposed Plaza area.

Channel-22 The comment asserts that the open-air restaurants are a major contributor to operational noise impacts because of their proximity to residents located to the northwest of the Proposed Project. For the reasons explained below, this assertion is incorrect. As discussed on page 3.11-52 of the Draft EIR, the greatest contributors to composite noise at locations northwest of the Proposed Project would be amplified sound and crowd noise from a post-event performance in the Plaza. The crowd noise associated with the open-air rooftop restaurant would not be the dominant contributor to noise that would affect the adjacent receptors located at the northwest corner of South Prairie Avenue and West Century Boulevard.

The composite noise levels arising from sources such as mechanical equipment, amplified sound from the stage, Plaza guests, and the restaurant patrons would result in noise levels that would be significant impacts at several receptors. Because the design of the restaurant space and other Plaza buildings is not yet finalized, Mitigation Measure 3.11-2(a) requires the development and implementation of an Operations Noise Reduction Plan to finalize noise reduction strategies at the appropriate point in the design process.

The Operations Noise Reduction Plan would 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 City has undertaken additional, more detailed, analysis to determine the required specifications for the Operations Noise Reduction Plan. The result of this additional analysis is that inclusion of a glass enclosure would further reduce noise levels from the rooftop restaurant to the offsite receivers to the north/northeast of the rooftop restaurant. An enclosure that would reduce noise contributions from the rooftop restaurant would need to meet certain requirements. As allowed by building code, an enclosure that would serve as a noise barrier along the north/northeast perimeter of the rooftop restaurant and provide a minimum of 8 dBA sound insertion loss would need to (1) be constructed with a material, such as glass, having a minimum density of 3.5 pounds per square feet (3.5 lbs/sf), (2) be a minimum of 60 inches high, and (3) be designed with no gaps between each panel or between the panel and the floor.

As revised, Mitigation Measure 3.11-2(a) includes ~~concrete specific~~ requirements for implementation and verification of the Operations Noise Reduction Plan as part of the building permit review process. As shown in the mitigation measure, the Operations Noise Reduction Plan would be developed and approved prior to issuance of the first building permit for the Plaza

buildings and verified prior to issuance of a Certificate of Occupancy (COO) for the Plaza buildings, and would be in effect for the duration of operations.

Commented [U8]: Abbreviated term is only used twice in the rest of the response, full phrase used many more times – consider whether necessary, perhaps eliminate.

Mitigation Measure 3.11-2(a), as shown on page 3.11-158 of the Draft EIR, states that the Operations Noise Reduction Plan "could include, but are not limited to…" six specific strategies. The comment asserts that the listed strategies would be ineffective, and are speculative and potentially infeasible. Mitigation Measure 3.11-2(a) was written to require that the Operations Noise Reduction Plan implement measures to reduce the increases in composite noise levels over ambient conditions at any noise-sensitive receptor to the maximum extent feasible. Contrary to the assertion in the comment, the strategies identified in Mitigation Measure 3.11-2(a) were crafted to be feasible, effective, and implementable, as explained below. Subsequently, as outlined above, Mitigation Measure 3.11-2(a) is revised to include specific performance standards for the amplified sound equipment, a wall surrounding the rooftop restaurant, and the enclosures to be constructed around the mechanical equipment.

To add clarity to the noise reduction strategies described on page 3.11-158 of the Draft EIR, Mitigation Measure 3.11-2(a) 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:

- *Construct~~ion of~~ 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 would 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.*~~

The project applicant has agreed to these changes to Mitigation Measure 3.11-2(a) and therefore the inclusion of these changes does not trigger recirculation pursuant to the requirements of CEQA Guidelines section 15088.5.

Draft EIR, page 3.11-158, last paragraph, is revised to read:

> **Significance after Mitigation:** Implementation of Mitigation Measure 3.11-2(a) would reduce Proposed Project composite noise levels by establishing performance standards where feasible. Due to distance attenuation and the effectiveness of screening materials such as steel, enclosing mechanical equipment and placing it as far away from receptors as possible would lower the contribution of mechanical equipment from composite levels. In addition, installation of a noise-attenuating sound barrier around the rooftop restaurant open dining areas

would lower the contribution of restaurant noise to the composite noise levels. Design of the outdoor stage and sound amplification system to limit amplified sound levels leaving the Project Site would reduce composite noise levels at affected receptors. The effectiveness of feasible noise reduction strategies such as sound enclosures for mechanical equipment, glass barriers around the rooftop restaurant, and the design of the amplified sound system have been established ~~would be dependent on the final design of the Proposed Project and thus are uncertain at this time~~. ~~D~~However, due to the uncertainty with feasibility and effectiveness of noise reduction strategies to control crowd-generated noise, composite noise impacts on weekday and weekend evenings would be **significant and unavoidable**.

The comment questions the efficacy and feasibility of six key elements of Mitigation Measure 3.11-2(a), each of which are discussed further below.

- *Installation of permanent sound barriers.* The Operations Noise Reduction Plan strategy reflects the design of the proposed permanent sound barriers around the Arena Site (see Figure 2-19 on page 2-48 of the Draft EIR) which would not be designed for the purposes of reducing noise impacts to the receptors at or near the Plaza entrance, i.e., to the northwest of the Plaza area. Other elements of Mitigation Measure 3.11-2(a), as refined above, are designed to lower the sound from the Plaza sources, and specifically require an enclosure around the rooftop restaurant area to be constructed "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." The noise-sensitive receptors to the northeast would be shielded from Plaza noise, as explained on page 3.11-71 of the Draft EIR, because "[t]he back of the stage would be completely enclosed with a sound shell extending up to 30 feet in height."

- *Equip noise generating mechanical equipment with sound enclosures.* The comment asserts that the Draft EIR fails to attribute the degree to which the noise impacts on residences to the northeast are due to mechanical equipment. This comment is incorrect in that there are no residences to the northeast of the Project Site; it is assumed that this is a typographical error and intends to refer to the noise-sensitive land uses to the northwest.

  Because sound from the mechanical equipment would occur concurrently with other sources in the Plaza area and sound levels at receptors are the result of multiple sources of sound, the Draft EIR appropriately evaluates impacts at a composite basis. The contribution of the mechanical equipment in shown in Draft EIR, Appendix J. As described above, the revised Mitigation Measure 3.11-2(a) would require the project applicant to "[e]quip noise generating mechanical equipment, including emergency generators, transformers, and HVAC units with sound enclosures that would reduce noise from these sources by a minimum of 10 dBA."

- *Locate noise generating mechanical equipment at the furthest distance from sensitive receptors as feasible.* The Operations Noise Reduction Plan would be prepared to guide the project design and in accordance with the Mitigation Measure 3.11-2-(a), would be submitted and approved by the City prior to the issuance of building permits for Plaza buildings, and verified prior to the issuance of the COO for the first Plaza building. 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. Please see the Response to Comment Channel-19 for more details.

- *Design the outdoor stage to limit noise levels*. The comment asserts that the Conceptual Site Plan (see Figure 2-7 on page 2-19 of the Draft EIR) indicates that the outdoor stage would result in "a clear line-of-sight to noise sensitive uses to the north east." This assertion is incorrect. Based on the preliminary design for the outdoor stage in the Plaza area, the back of the outdoor stage, which would be located on the east side of the stage, would be completely enclosed with a sound shell extending up to 30 feet in height and the speakers would be oriented inward toward the west/southwest where the majority of the audience would be located, and not to the northeast as suggested in the comment. The refinements to Mitigation Measure 3.11-2(a) included above would require that any "amplified sound system, equipment, and/or structures in the Plaza," including the outdoor stage and any acoustical enclosure, be designed "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."

- *Utilize sound-absorbing materials on Plaza buildings*. As described above, the Operations Noise Reduction Plan would be prepared to help guide the project design and, in accordance with Mitigation Measure 3.11-2-(a), would be submitted and approved by the City prior to the issuance of building permits for Plaza buildings, and verified prior to the issuance of the COO for the first Plaza building. As explained in Response to Comment Channel-19, the design of the outdoor stage would include use of sound- absorbing materials on the plaza buildings to reduce sound reflected off the structures, as well as to minimize or eliminate the tunneling effect from sound propagating through the entrance opening. The refinements to Mitigation Measure 3.11-2(a) included above would require the project applicant to "[u]tilize sound-absorbing materials on the exterior of Plaza buildingsto reduce potential tunneling effect from onsite buildings to adjacent off-site sensitive receivers." With the application of the absorptive materials on building exterior surfaces, the potential tunneling effect through the Plaza area northwest entrance opening would be minimized/eliminated and only the receptors with line-of-sight to the crowd and stage in the Plaza area would be exposed to direct sound from the Plaza area. In addition, refinements to Mitigation Measure 3.11-2(a) would require that the project applicant "[d]esign the outdoor stage and sound amplification system (placement, orientation and/or number of speakers, and maximum volume) so as to limit noise levels at the project boundary/property line near off-site noise-sensitive receptors."

- *Enclose the rooftop with a noise barrier such as glass.* As explained in Response to Comment Channel-19, above, the noise analysis for the rooftop restaurant indicates that the rooftop restaurant crowd noise would not be the dominant noise source for the offsite receivers located near South Prairie Avenue and West Century Boulevard. Because the rooftop restaurant noise would contribute to composite noise levels which would result in significant impacts, the Draft EIR includes a number of noise reduction strategies.

  To better clarify the intent and efficacy of Mitigation Measure 3.11-2(a), the requirements for the Operations Noise Reduction Plan were refined in Response to Comment Channel-19, including the timing of plan approval, and specification that the rooftop restaurant would include an enclosure that would be constructed with a material, such as glass, having a minimum density of 3.5 pounds per square feet (3.5 lbs/sf) along the north/northeast perimeter of the rooftop restaurant, would be a minimum of 60 inches high, and would have no gaps between each panel or between the panel floor, and as allowed by building code, and that such an enclosure would provide a minimum of 8 dBA sound insertion loss. Inclusion of the glass enclosure required in refined Mitigation Measure 3.11-2(a) would further reduce noise levels from the rooftop restaurant to the offsite receivers to the north/ northeast (or northwest) of the rooftop restaurant.

As demonstrated above, the assertion that the Operations Noise Reduction Plan constitutes ineffective and deferred mitigation, including the rooftop open-air restaurant, is incorrect. If the Proposed Project is approved, the Operations Noise Reduction Plan would be prepared to guide the project design and would be included in and be enforceable through Mitigation Measure 3.11-2(a). The Operations Noise Reduction Plan for Plaza buildings would be developed and approved by the City prior to the issuance of the first Plaza building permit 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. Please also see Response to Comment Channel-19.

Channel-23 The Draft EIR does not improperly defer mitigation. As discussed in Response to Comment Channel-22 above, the measures are described in detail, including implementation and verification as part of the building permit and Certificate of Occupancy review process. Under CEQA, where a significant impact of the Proposed Project is identified, the EIR is required to "describe feasible measures which could minimize significant adverse impacts."

The comment states that "deferral of the formulation of effective mitigation measures subverts the Legislature's purpose" and asserts that any deferral of development of detailed methods of mitigation is improper and inconsistent

with the purpose of CEQA. The comment fails to reflect the explicit provisions under CEQA that allow for proper and appropriate development of increasing levels of detail in mitigation measures over time as circumstances evolve. CEQA Guidelines section 15126.4(a)(1)(B) states that "[f]ormulation of mitigation measures shall not be deferred until some future time." However, the Guideline goes on to explicitly state that:

> The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure.

Please also see Responses to Comments Channel-39 and NRDC-9 for additional discussion regarding assertions that the Draft EIR included improperly deferred mitigation measures.

Commented [U9]: Address font size.

Channel-24 The Draft EIR identifies definite and feasible mitigation measures which the City would impose on the Proposed Project if it chooses to approve the Proposed Project. Draft EIR, page 3.11-103 listed Mitigation Measure 3.11-1, Construction Noise Reduction Plan, Draft EIR, page 3.11-158 listed Mitigation Measure 3.11-2(a), Operations Noise Reduction Plan and Mitigation Measure 3.11-2(b), Implement Mitigation Measure 3.14-2(b) (Implementation of a comprehensive Transportation Demand Management (TDM) program).

As described in the Responses to Comments Channel-19 and Channel-22, Mitigation Measure 3.11-2(a) has been refined to add details that better clarify the intent and efficacy of regarding the Operations Noise Reduction Plan, which include the following mandatory measure regarding the rooftop restaurant.

- Implement a glass enclosure/sound wall with materials having a minimum density of 3.5 pounds per square feet (3.5 lbs/sf) along the north/northeast perimeter of the restaurant, 60 inches high, and have no gaps between each panel or between the panel floor, and as allowed by building code, that would serve as a noise barrier and would provide a minimum of 8 dBA sound insertion loss.

Mitigation Measure 3.11-2(a) also includes additional measures to be considered in the design of the Plaza and outdoor stage area, implementation of which shall demonstrate that noise levels from amplified sound equipment would not result in noise levels more than 3 dBA over ambient conditions at any noise-sensitive

receptor. Additional strategies to be considered in the design of the Stage include the following measures:

- Designing 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 at the project boundary/property line near off-site noise-sensitive receptors.
- Utilizing sound-absorbing materials on the exterior of Plaza ~~buildings~~ structures where appropriate and effective to reduce noise levels at adjacent off-site sensitive receptors.

Commented [U10]: Consistency with MM 3.11-2(a)

Also, Mitigation Measure 3.11-~~12(a)~~ clearly identifies that a Construction Noise Reduction Plan would be developed and approved by the City prior to the issuance of ~~of any demolition or construction permit for each phase of project development a building permit or ground-disturbing activity for any phase of the Proposed Project~~ and would be verified periodically throughout construction. Similarly, an Operations Noise Reduction Plan would be developed and approved prior to the first building permit for Plaza building being issued 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.

Commented [U11]: Consistency with p. 635 (Gerson-4)

Therefore, through Mitigation Measure 3.11-2(a), the Draft EIR identifies mitigation requiring the implementation of a glass enclosure/sound wall providing a minimum 8 dBA sound insertion loss at the rooftop restaurant and - if needed, imposition of a maximum volume of 92 dBA Leq at 100 feet directly in line with each speaker for the stage amplification system.

Channel-25 The Draft EIR does not analyze a concurrent scenario that includes an NFL football game and an NBA basketball game for the reason presented on page 3.14-9 of the Draft EIR: the ability and willingness of the NBA to avoid scheduling home games on certain dates when requested by a member team. The May 16, 2019 letter from NBA Game Schedule Management is both detailed and compelling. According to this letter, for over a decade, there have been no instances of NBA and NFL games occurring on the same day where the event centers are located close to each other (a circumstance that would also occur in Inglewood with the Proposed Project). The letter describes the process the NBA undertakes with teams to determine suitable dates for play. Notably, the letter describes a secondary process whereby available dates for NBA games are updated after the NHL schedule is released, and prior to release of the NBA schedule, ~~supplemental NBA game rescheduling may occur~~ for arenas hosting

both NHL and NBA teamsdays in which NBA games and NHL hockey matches would overlap in the same arena. Since NHL hockey teams play five times as many home games per season as NFL football teams (and the NHL's season overlaps with the NBA's season for more months of the year than the season for NFL football), this suggests the NBA has sufficient flexibility in its schedule to avoid scheduling concurrent events. The final sentence of the NBA letter is clear: "The NBA intends to continue to utilize the above-described scheduling process going forward". That process has not resulted in a single regular season NBA game being played on the same day as a home NFL game in the same market where the venues are proximate over the past decade.

The comment notes that NFL and NBA games have been scheduled concurrently in the Los Angeles market. However, these games were not located in adjacent venues. As explained above, with NFL and NBA games occurring in adjacent venues, the NBA schedule, which is set after the completion and public release of the NFL schedule, would be managed to avoid concurrent games.

The Draft EIR does analyze a concurrent events scenario similar to the one requested by the commenter, but instead of an NBA game at the Proposed Project, a concert was included in Scenario 5. The attendance analyzed for a concert in the Proposed Project arena is 18,500 whereas the attendance analyzed for an NBA game is 18,000. Thus, the Draft EIR analyzed a worst-case, three-event scenario on a single day with sell-out events at each of the three major event venues in the project vicinity. The results of this analysis, Scenario 5, are presented on pages 3.14-361 through 3.14-375 of the Draft EIR for the Adjusted Baseline scenario and on pages 3.14-433 through 3.14-345 of the Draft EIR for the Cumulative scenario. Scenario 5 in the Draft EIR is therefore comparable to the scenario that the comment states should have been analyzed.

Channel-26 The City believes that incorporation of a mitigation measure to prohibit events at the Proposed Project if it would result in daily attendance of more than 24,500 persons at the three venues is not feasible for a multitude of reasons. For instance, either an NFL Football game or a mid-sized (25,000-person) weekday evening event at the NFL Stadium would prohibit any event activities at the Proposed Project, even non-overlapping daytime events or smaller evening gatherings. As explained on page 3.14-6 of the Draft EIR, this would immediately eliminate 28 potential dates from the available schedule of events. Additionally, Draft EIR, page 3.14-10 indicates that The Forum typically hosts 75 concerts per year. A sold-out event at The Forum has an approximate attendance of 17,500 persons. When such events occur, concerts, family shows, or other events at the Proposed Project may require limited attendance (i.e., fewer than 7,000 persons if The Forum event is a sell-out). Thus, on more than 100 days per year, this suggested measure would limit the ability of the project

applicant to schedule NBA basketball games or other major events at the Proposed Project.

Such a mitigation would be impracticable. For instance, strict interpretation of this measure would require that an NBA game slated for a weekday evening in April would need to be moved if the NFL Stadium or The Forum booked an event expected to attract more than 6,500 persons on that same day. Additionally, expected attendance levels for concerts and other events are not well-known until days leading up to the event based on ticket sales, further causing challenges to implementation of such a mitigation measure. In conclusion, this recommended mitigation measure is not feasible for a variety of reasons.

In order to explore further this proposal, the City retained David Stone of Stone Planning LLC to provide an independent evaluation of its feasibility. Mr. Stone is a professional economist and an expert on the sports and entertainment industry, and has extensive experience regarding the economics and practical considerations related to the programming major sports and entertainment venues. Mr. Stone concludes that the proposal set forth in the comment is infeasible because, for example, it would potentially preclude the scheduling of non-NBA events, advanced bookings for events such as the NCAA Tournament, and interfere with the advance scheduling of NBA playoff games.[46] The City has reviewed Mr. Stone's analysis and agrees with this analysis and conclusions.

Draft EIR, Appendix R is revised to add Mr. Stone's May 21, 2020 memorandum to Mindy Wilcox to the end of the Appendix.

The latter part of this comment cites 52 intersections in the project vicinity that would be expected to operate at LOS F conditions under Scenario 5 (i.e., concurrent events at the Proposed Project, The Forum, and NFL Stadium on a weekend). This value, which is derived from Table 3.14-80 on page 3.14-376 of the Draft EIR, is representative of LOS F conditions throughout the study area and not just in the immediate project vicinity. So, this comment is inaccurate in its portrayal of degraded conditions in the project vicinity.

The comment cites 52 LOS F intersections as the basis for why an attendance cap for the Proposed Project would provide "substantial environmental benefits" during concurrent events. However, this assertion neglects a key environmental impact consideration. An LOS F condition does not necessarily imply the presence of a significant impact. Draft EIR, page 3.14-299 provides a detailed description of reasons concurrent event Scenario 1 (Major Event at Proposed Project and Concert at The Forum) were chosen as the most appropriate scenario

[46] Memorandum from David Stone, Stone Planning, to Mindy Wilcox, City of Inglewood. Re: IBEC and Proposed Attendance Restriction, May 21, 2020.

to test mitigation measure effectiveness. Scenarios 4 and 5 were determined not to be appropriate for identifying and testing mitigation measures, particularly physical and permanent improvements, given the rarity with which those scenarios would occur.

The range of mitigation measures proposed to avoid or substantially lessen Proposed Project impacts would include physical measures, signal timing improvements, TDM strategies and implementation of an Event TMP. As stated on page 3.14-460 of the Draft EIR, on days with concurrent events at The Forum and/or the NFL Stadium, Mitigation Measure 3.14-28(d) would require the City to coordinate with operators of the NFL Stadium TMOP and the Event TMP. This measure would allow each plan to be coordinated and operate more efficiently. The Draft Event TMP presented in Draft EIR, Appendix K.4 includes an entire chapter on planning for concurrent events at The Forum and/or the NFL Stadium. Since the Draft EIR was published, it was announced that a company affiliated with the project applicant reached agreement with the Madison Square Garden Company (MSG) to acquire The Forum~~steps have been taken that would bring The Forum and the Proposed Project under a single ownership~~, which ~~would~~ may allow for better information sharing and coordination on event scheduling at the two venues.

Channel-27 Please see Responses to Comments Channel-38 and Channel-39.

Channel-28 NBA games would represent only approximately 49 of approximately 243 events at the Proposed Project arena. Anticipated events at the proposed Arena are summarized in Table 3.14-2 on page 3.14-7 of the Draft EIR and include concerts, family shows, corporate/community events, plaza events and other events. For non-NBA events, which represent 80 percent of the anticipated events at the Proposed Project arena, the NBA's process for allowing teams to identify unavailable dates would have no effect.

Table 3.14-2 on page 3.14-7 of the Draft EIR also presents an estimate of 107 annual events at the NFL Stadium (32) and at The Forum (75) with maximum attendance totals that could exceed 6,000. As such, the suggested mitigation measure would preclude use of the Proposed Project arena on over 100 days each year.

Further, the proposed mitigation measure would be inconsistent with many of the City's basic objectives for the Proposed Project, described on page 2-4 and 2-5 of the Draft EIR, including Objective 2 (economic development), Objective 3 (expand opportunities for the City's residents and visitors to participate in a wide range of sporting, cultural, civic and business events), Objective 7 (Create employment opportunities) and Objective 8 (provide substantial public benefits,

including jobs, property and sales taxes, admissions taxes, and transient occupancy taxes).

For these reasons and other related reasons explained in Response to Comment Channel-26, the City does not consider the suggested measure to be practical or feasible. Please also see Response to Comment Channel-26.

The City notes that the suggested mitigation was proposed by a lawyer representing the union submitting the comments, rather than by a person with expertise in programming or scheduling entertainment or sport venues, such as the City's expert cited in Response to Comment Channel-26.[47] The comment does not provide any information supporting the author's expertise with respect to such matters. The City therefore finds that the commenter does not have credibility to provide this comment.

Channel-29 The NFL Stadium, being constructed about one-half mile north of the Project Site, is part of the context of the Proposed Project, but is not part of the Proposed Project. The EIR for the Proposed Project focuses on the impacts of the Proposed Project, including considering the effects of the Proposed Project in the context of the presence of the nearby stadium, but the EIR is not an analysis of the operations of the NFL Stadium. The comment suggests that the Proposed Project garages, if used for parking for an event at the NFL Stadium, would change the geographic distribution of traffic to the NFL Stadium. The potential for this to occur was identified in the Draft EIR, determined to be a significant impact, and feasible mitigation measures which would lessen the severity of the impact are identified, as discussed further below.

The Project Site has already been identified as a location that will be available for stadium patron parking.[48] The amount of available parking identified in applicable reports cited below (3,600 spaces) is comparable to the amount of parking that

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47 Memorandum from David Stone, Stone Planning, to Mindy Wilcox, City of Inglewood. Re: IBEC and Proposed Attendance Restriction, May 21, 2020.

48 At the time the City of Champions Revitalization Initiative was proposed, the City prepared a report on the Initiative pursuant to Elections Code section 9212. The report analyzed, among other topics, whether there would be sufficient parking in the area to accommodate the needs of the proposal, including parking demand from the NFL Stadium (see Memorandum to Mayor and City Council from City Clerk, Economic and Community Development Department and City Attorney, CEC Section 9212 Report etc. (February 24, 2015)). The report was accompanied by a Transportation and Parking Plan and a Traffic Impact Analysis prepared by Linscott, Law and Greenspan, a traffic engineering firm (Linscott, Law and Greenspan, *Transportation and Parking Plan, Hollywood Park Stadium Alternative Project* (February 2015); Linscott, Law and Greenspan, *Traffic Impact Analysis, Hollywood Park Stadium Alternative Project* (February 2015)). The reports concluded that there were a total of 33,000 parking spaces available for stadium-related use within a one-mile radius of the NFL Stadium. The Project Site is identified in the reports as one location that would be available for use by NFL Stadium patrons during large events. Specifically, the Traffic Impact Analysis (see page 5) and the Transportation and Parking Plan (see Figure 4, page 12) states that for NFL Stadium events that are expected to attract more than 27,000 patrons, it is likely that off-site parking will be required for patrons. To accommodate this additional parking demand, the reports cited that up to 3,600 parking spaces would be designated for use as overflow parking south of Century Boulevard.

would be incorporated into the Proposed Project (4,125 parking spaces). The use of the site to provide parking for the stadium is not a new proposal associated with the Proposed Project; rather, the use of the Project ~~site~~ Site for stadium parking was identified in 2015 in connection with the City of Champions initiative.

Commented [U12]: global consistency check

In order to be sensitive to the project context in which events at the nearby ~~stadium~~ NFL Stadium could be taking place concurrently with events at the Proposed Project arena, the effects of the operation of the Proposed Project concurrently with two types of events at the NFL Stadium were studied as part of the concurrent events analysis:

- A sold-out (70,240-person) NFL football game that would start on a Sunday at 1:25 PM at the NFL Stadium; and
- A 25,000-person non-football event held on a weekday evening starting at 7 PM.

As required in the HPSP Development Agreement, the NFL Football Stadium would provide approximately 9,000 parking spaces for stadium events. This supply is sufficient to fully accommodate the parking needs for the 25,000-person weekday event, but it is not adequate for a sold-out NFL football game scenario. Draft EIR, page 3.14-319 discusses how off-site parking will be provided and attendees transported to/from the NFL Stadium during football games. Draft EIR, page 3.14-459 acknowledges that attendees to the football game may park in one or more of the Proposed Project garages, and that since the Event TMP would not be operational, traffic operational concerns could arise at the garage access points, which could affect adjacent intersections. This was identified as a significant impact as part of Impact 3.14-28.

Mitigation Measure 3.14-28(f) on page 3.14-460 of the Draft EIR specifies that the City of Inglewood must require the NFL Stadium TMOP (Transportation Management and Operations Plan) to incorporate special traffic management provisions to cover conditions during which attendees to an NFL football game would utilize Proposed Project garages.

There is no evidence in the record to support a reasonable assumption that events at The Forum would utilize the Proposed Project parking garages. Overflow parking demand from an event at The Forum is not expected to result in parked vehicles at the Proposed Project garages under normal conditions because closer overflow parking would be available within the HPSP area.

If a major event at The Forum were to overlap with a Sunday NFL Football Game (when no event is held at the Proposed Project), the timing of these events becomes an important consideration. A Sunday NFL football game would typically end by about 4:30 PM, whereas the event at The Forum would not start

until 7 PM. Based on data from other football stadiums, by the beginning of the 6-7 PM peak hour, over 90 percent of attendees to a football game at the NFL Stadium would have already departed in the 1.5 hours following the end of the game. Thus, to the extent The Forum event needs to rely upon overflow parking at the NFL Stadium, it is reasonable to assume that an adequate supply would be available due to the vast majority of football game attendees having already departed prior to the pre-event peak hour for The Forum event.

The comment states that the EIR does not consider the impacts on emergency access in the event the Proposed Project's garages are used for events at The Forum or the NFL stadium. The comment does not include any supporting information as to how emergency access impacts that are assessed in Draft EIR, Section 3.14, Transportation and Circulation, were overlooked or underestimated. Because such impacts could occur as a result of peak congestion on the road network in the vicinity of Centinela Hospital Medical Center, and since the Draft EIR considered the effects of both major events at the Proposed Project, and the combined effects of concurrent major events at the Proposed Project, the NFL Stadium, and The Forum, as well as numerous other scenarios involving smaller events, there is no evidence in the record to support an argument that use of one or more of the Proposed Project parking garages in the context of an NFL Stadium event would create significant impacts that would be different from or greater than those already disclosed in the Draft EIR.

Similarly, noise impacts associated with the use of one or more of the Proposed Project parking garages in the context of an NFL Stadium event would be driven by vehicular movement on the City streets or in the parking garages themselves. The impacts of street traffic noise generated by such uses would not be greater than the noise impacts evaluated for the concurrent event scenarios and already disclosed in Draft EIR, Section 3.11, Noise and Vibration. The section also already accounts for the noise generated by full use of the parking garages for event traffic at the Proposed Project. If the cars that fill the parking garages are associated with an event at the NFL Stadium, the noise from the garage would be no different from the noise generated by cars of attendees at the Proposed Project. However, because the ambient noise levels would be quieter during the post-basketball game period (9:30 PM or later) than the post-NFL game period (Sunday afternoons at 4:30 or thereabouts), the noise impacts (which are based on increased noise levels over ambient) would be less following NFL Stadium events than described in the Draft EIR for the Proposed Project.

The highest possible number of vehicles traveling to the Proposed Project was accounted for in the localized air quality impacts. During operation of the Proposed Project, the potentially highest localized air quality impacts are expected to occur when the Project Site hosts a major event (i.e., sold-out

concert) and the NFL Stadium and The Forum experience full-capacity events on the same day. The EIR analyzed this scenario by applying the maximum peak hour volumes for a major event at the Project Site, major events at The Forum and NFL Stadium, and maximum peak hour volumes for the ancillary uses at the HPSP. This scenario assumes all parking structures would be utilized and these maximum peak hour volumes would occur simultaneously within the local study area, which includes residents surrounding the Project Site. This scenario is expected to represent the highest operational localized air quality impacts from event attendees and normal traffic, as it assumes all parking structures would be utilized and accounts for multiple venues hosting events. For this reason, the most conservative approach was included in the Draft EIR as it considered the worst-case scenario, therefore air quality impacts were not underestimated to residents near the Proposed Project.

Additionally, all parking structures associated with the Proposed Project were assumed to be operational year round (i.e. 24 hours a day for 7 days a week), therefore energy consumption was calculated based on conservative assumptions and was not underestimated.

As discussed on page 3.11-75 of the Draft EIR, the composite operational noise analysis assumed that project parking structures (specifically the South, West, and East Parking Garages) would be parked to capacity under the Other Sporting Event or Gathering and Major Event scenarios. Therefore, noise associated with full-capacity use of all project parking garages has been accounted for.

Channel-30 During the preparation of the transportation analysis presented in the Draft EIR numerous counts were taken to document pedestrian conditions in those times that would experience peak conditions when events at the Proposed Project arena would conclude. The pedestrian counts were taken both on evenings when no event was taking place at The Forum and on evenings when a major concert was occurring at The Forum.

- During the post-event peak hour (9:30 to 10:30 PM) on a Friday night in April 2018 when no event was occurring at The Forum, a combined 50 pedestrians were observed using the four crosswalks at South Prairie Avenue and West Century Boulevard.
- On a weekday evening in December 2018 when an event was not being held at The Forum, the South Prairie Avenue/West Century Boulevard intersection had 43 total pedestrian crossings from 10 PM to midnight.
- On Thursday, December 13, 2018, a Fleetwood Mac concert was held at The Forum and the pedestrian volume at the Prairie Avenue/Century Boulevard intersection was 109 persons from 10 PM to midnight.

- On Monday, December 17, 2018, a Childish Gambino concert was held at The Forum and the pedestrian volume measured at the Prairie Avenue/ Century Boulevard intersection was 58 persons from 10 PM to midnight.

Thus, events held at The Forum have a negligible effect on pedestrian volumes at the intersection of South Prairie Avenue and West Century Boulevard, and irrespective of an event occurring or not at The Forum, levels of usage of sidewalks around the Project Site are trivial when compared to pedestrian flows that would take place after an event concludes at the Proposed Project, in which the east leg crosswalk alone is projected to accommodate 3,450 pedestrians in one hour (see Figure 3.14-12 on page 3.14-46 of the Draft EIR for post-event peak hour pedestrian flows on key sidewalks and crosswalks).

Pedestrian flows would change under a scenario in which a Major Event at the Proposed Project operates concurrent with a Midsize Event at the NFL Stadium. All parking needed for the NFL Stadium event would occur within the 9,000 spaces provided within the HPSP area. However, since that parking would no longer be available for Proposed Project attendees, they would instead be shuttled to and from off-site remote parking lots. As a result, pedestrian flows on the south side of South Prairie Avenue between West Century Boulevard and South Doty Avenue, and those crossing West Century Boulevard would be much lower for this scenario than for the Baseline Plus Proposed Project (Major Event) scenario because after the event concludes at the Proposed Project arena attendees would not be walking toward parking in the HPSP area.

If a concert were held on a Sunday evening at the Proposed Project on the same day as a sold-out NFL Football game, overall pedestrian flows for a pre-event peak hour condition would be lower than for the Baseline Plus Project (Major Event) post-event peak hour condition because the majority of NFL game attendees would have departed prior to the beginning of the peak hour, and pre-event arrivals to the concert are dispersed over a greater period of time than highly concentrated post-event departures. In conclusion, the Draft EIR analysis of pedestrian activity surrounding the Proposed Project analyzed and mitigated for the appropriate reasonably worst-case scenario.

The comment states that the sidewalks in the Proposed Project vicinity are inadequate for the high pedestrian volumes. The evidence does not support this statement. In fact, the comment does not provide a correct description of sidewalks in the area. For example, the comment describes the sidewalk on the north side of West Century Boulevard as lacking a landscape buffer and being too narrow to accommodate expected pedestrian flows. This statement is incorrect. Review of aerial imagery shows there is a consistent eight-foot sidewalk separated from the traveled way by a landscape buffer east of South Prairie Avenue. Analysis presented in Table 3.14-38 on page 3.14-133 of the

Draft EIR indicates that this sidewalk would operate at an acceptable LOS C or better during the post-event peak hour with a Major Event Concert at the Proposed Project.

The use of an average of 13 square feet per pedestrian as a threshold of significance for acceptable sidewalk operations is based on guidance from the Transportation Research Board's Highway Capacity Manual (HCM), 6th Edition.[49] The Transportation Research Board is a part of the National Academy of Sciences, Engineering, and Medicine, and is fundamental reference for evaluating and establishing performance measures for the multimodal operation of streets, highways, freeways, and off-street pathways. The assertion in the comment that using this threshold amounts of 'blind reliance' misses the fact that comparable numerical values have been in use for decades to establish significance criteria for intersections (expressed as either v/c ratio or delay), freeways (expressed in density), noise (expressed in decibels), etc. The threshold is based on actual data regarding the amount of space a pedestrian finds to be comfortable. Although the comment questions this standard, the comment provides no evidence supporting its assertion that a different standard should be used.

Channel-31 The calculations used to estimate average pedestrian space which are presented in Table 3.14-38 can be found in Draft EIR, Appendix K.3, as is indicated on page 3.14-133 of the Draft EIR (see Draft EIR, Appendix K.3, pages 3,198 – 3,200). Those pages show actual widths of sidewalks, shy distance to interior and exterior features, tree wells and other obstruction and the resulting effective widths. The average pedestrian space is estimated by first calculating the pedestrian flow rate (expressed in pedestrians per minute per foot) and then dividing that value by the assumed walking speed of 4 feet per second, as recommended by the HCM, 6th Edition. The corresponding pedestrian LOS is determined by comparing the average pedestrian space against the values in Exhibit 16-4 of the HCM, 6th Edition.

Table 3.14-38 indicates that study sidewalks on West Century Boulevard are eight feet in width. This can be readily confirmed by reviewing aerial imagery on the north side of the street. At the time of the analysis, the Century Boulevard Improvement Project had not yet been completed and the sidewalk on the south side was as narrow as four feet in some areas. However, the Century Boulevard Improvement Plans[50] would include widening this sidewalk to a consistent width of eight feet. Because this improvement would be in place prior to the operation of the Proposed Project arena, it was assumed for analytical purposes

[49] Transportation Research Board, *Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis*, November 2016.
[50] AECOM, *Plans for Improvement of Century Boulevard Inglewood Ave to Doty Ave.*, March 2018.

to be in place. Thus, the analysis properly analyzed event-related pedestrian flows based on eight-foot sidewalks in the area.

Channel-32 This potentially significant secondary effects of constructing the sidewalk on the east side of South Prairie Avenue between West Century Boulevard and the Pedestrian Plaza with 8 feet of width, versus 20 feet as originally proposed, are disclosed on page 3.14-217 of the Draft EIR. The discussion explains that the result of wayfinding signage required in the Event TMP (required in Mitigation Measure 3.14-2(a)) would be that "the majority of post-event attendees using the primary plaza exit to access the east leg crosswalk at the Prairie Avenue/ Century Boulevard intersection, thereby limiting flows on this sidewalk to match its available width." The Event TMP (Draft EIR, Appendix K.4, page 26) explains that an eight-foot sidewalk can carry considerable volumes of pedestrian traffic, but that wayfinding should be implemented in the Pedestrian Plaza to guide pedestrians in a generally northerly direction toward West Century Boulevard. Additional discussion of this segment of sidewalk is presented below.

The portion of the South Prairie Avenue east-side sidewalk that is in question would extend for approximately 315 feet south of West Century Boulevard to the proposed opening of the Pedestrian Plaza. Based on the very limited current use of the sidewalks in the vicinity of the Project Site (see Response to Comment Channel-31), use of this segment of sidewalk would primarily be limited to those attendees desiring to cross West Century Boulevard via the east leg crosswalk to access a parked vehicle or retail use in the HPSP area. Figures 2-16 and 2-18 on pages 2-39 and 2-42 of the Draft EIR illustrate that the most direct route for the majority of attendees exiting the arena after an event concludes would be through the wide Pedestrian Plaza, which angles northwesterly toward the intersection of South Prairie Avenue and West Century Boulevard.

However, for some attendees who exit the arena from doors located in the most westerly side of the arena, the South Prairie Avenue sidewalk could be a viable route to access the West Century Boulevard crosswalk. The vast majority of attendees parked in the West Parking Garage would be expected to use the pedestrian bridge, which is accessible from the Pedestrian Plaza and provides a direct route to parking; wayfinding would ensure that attendees are aware of this route to the West Parking Garage. If it is conservatively assumed that 50 percent of all attendees that use the east leg crosswalk were to walk from the arena via this portion of the sidewalk, the resulting volume would be 1,725 pedestrians. That volume would correspond to an LOS B condition pedestrian space condition, which is considered acceptable. Even under an overly conservative assumption that all crosswalk users were to walk from the arena via this sidewalk, this segment of the sidewalk would operate at an acceptable LOS D.

Therefore, the Draft EIR conclusion that an eight-foot sidewalk would function acceptably on the east side of South Prairie Avenue south of West Century Boulevard is correct. Widening this sidewalk beyond eight feet would not be necessary in order to provide adequate and safe pedestrian capacity.

The comment describes a scenario with attendees crossing the 101st Street crosswalk on Prairie Avenue. This scenario would not occur. As shown on Figures 8 and 9 in the Draft Event Transportation Management Plan in Draft EIR, Appendix K.4, the 101st Street crosswalk would be closed before and after events. Additionally, since traffic control officers would be present in this area, they would monitor pedestrian activity and address issues that arise.

Chapter 12 of the Event TMP addresses monitoring of pedestrian flows, and thus is already required through Mitigation Measure 3.14-2(a). The Draft TMP specifically includes a performance standard whereby pedestrians do not spill out of the sidewalks onto streets with moving vehicles, particularly along portions of West Century Boulevard and South Prairie Avenue adjacent the Proposed Project.

Channel-33 Response to Comment Channel-32, above, describes information in the Draft EIR that demonstrates that an eight-foot sidewalk width along the east side of South Prairie Avenue south of West Century Boulevard would be able to accommodate projected pedestrian flows after major events conclude at the Proposed Project under even the most conservative assumptions. Therefore, there is no basis to impose a mitigation measure on the Proposed Project, such as widening this sidewalk to 20 feet as suggested in this comment. Whether such a physical improvement is feasible or not is irrelevant because such an improvement is not warranted because a significant impact was not identified.

Channel-34 Please see Responses to Comments Channel-30 through Channel-33 which describe the pedestrian analysis included in the Draft EIR, and substantiate why the Draft EIR does not need to be revised as asserted in the comment. 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.

Channel-35 Draft EIR, page 3.14-245 concluded that Proposed Project transit impacts associated with rail ridership levels would be less-than-significant. Please see Response to Comment Metro-2 for an in-depth response on this topic.

The discussion of transit impacts found on page 3.14-131 and 3.14-188 of the Draft EIR does not conclude that the "project would result in transit demand significantly exceeding capacity during major events," as stated in the comment. Specific conclusions reached in the transit analysis are that: "there would be sufficient rail transit capacity to accommodate the Proposed Project demands

during the weekday and weekend pre-event peak hours" (see Draft EIR, page 3.14-130), and that for weekday post-event conditions "a major event at the Proposed Project could cause ridership in light rail trains traveling in the eastbound direction on the Green Line to exceed their capacity" (see Draft EIR, page 3.14-131). Table 3.14-37 indicates that the capacity would be exceeded by 8 percent, or 69 riders.

For weekday pre-event peak hour conditions, each two-car train is estimated to have a capacity of 238 persons. For post-event peak hour conditions, the capacity is assumed to be 170 passengers per train (reflecting a lower capacity for off-peak conditions established by Metro). Had the pre-event capacity value been applied to post-event conditions, the resulting capacity would have been 1,190 persons (not 850), which would have resulted in the eastbound Green Line "plus project load" of 919 persons being at 77 percent of capacity. In other words, the lower assumed train capacity under post-event conditions is an important contributor to the result shown in Table 3.14-37. In reality, crowd levels on the typical post-event train would feel no different than crowd levels on a typical pre-event train for which the analysis found capacity would not be exceeded.

The comment states that rail transit overcrowding on the Green Line would worsen when there are concurrent events held at the Proposed Project, NFL Stadium, and/or The Forum. The comment does not provide any evidence as to why those venues would attract riders to this line during overlapping time periods. For instance, The Forum currently does not operate a shuttle to transport attendees between that venue and rail stations, and there are no known plans or proposals to run such a program in the future.

Three common types of events are expected at the NFL Stadium: 6,000-person evening event at the performance venue, 25,000-person weekday mid-sized event, and NFL football game (with seating capacity for up to 70,240 persons). As for the first two event types, there are no known plans to transport attendees between the NFL Stadium and nearby transit stations. For the third event, shuttles are planned to transport attendees to/from the NFL Stadium and nearby rail stations. Accordingly, this overlapping scenario merits further discussion as provided below.

During the 2016/17, 2017/2018, and 2018/2019 regular seasons, the NFL Los Angeles Rams and Chargers, played 83 percent of their home games on Sunday afternoons. The most likely overlapping time period of transit use would occur from approximately 4:30 PM (after the football game concludes) until about 7 PM (at which time a concert would start at the Proposed Project). Note that the NBA has submitted a letter indicating that NBA basketball regular season games would not be scheduled on the same day as an NFL football game played

at an adjacent venue. While there could be some overlapping transit use by attendees departing the NFL game and attendees arriving to the concert at the Proposed Project, those arriving and departing riders would be traveling in opposing directions (i.e., post-event football game attendees would be leaving, while pre-event concert attendees would be arriving). Thus, although both events would be expected to generate demand for rail transit, the demand would not overlap such that the same riders occupy the same train. ~~Thus, e~~ven if concurrent events would increase overall ridership on the Green line or any other Metro line, there is no evidence to suggest that the directional demand of each venue would overlap with the other. Thus, the comment's hypothetical set of questions pertaining to secondary effects caused by the transit system being overcapacity are not relevant to the analyzed outcomes of the Proposed Project under concurrent event conditions.

Notwithstanding the above, and despite the chances of occurrence being very since the vast majority of NFL Football games are played on Sundays, it is theoretically possible that an NFL Football Game could occur on a Monday or Thursday evening during which there is also a medium to large concert or other major event at the Proposed Project arena. Table 3.14-2 on page 3.14-7 of the Draft EIR indicates such concerts would occur about 13 times per year, and more likely to occur on Fridays or Saturdays, and thus this type of overlapping event is expected to occur far less frequently than even once per year. Mitigating for such a rare condition would be akin to providing parking supply at a retail center not just for the busy shopping day after Thanksgiving, but for the busiest shopping day after Thanksgiving within the last three to five years, or to designing a church to accommodate parishioners on Easter Sunday, rather than on a typical Sunday. CEQA does not require analysis of such unique and rare conditions. Pursuant to CEQA Guidelines section 15143, "[t]he significant effects should be discussed with emphasis on in proportion to their severity and probability of occurrence."

The Draft EIR transportation analysis addresses the impacts of the Proposed Project under 65 different operational permutations of days of the week, types of events, and overlapping or concurrent events. Based on evidence in the record, the type of event posited in the comment would be extremely rare and thus is neither appropriate nor necessary to address such a scenario in the EIR. That said, the Event TMP acknowledges the potential for events at the Stadium, Forum and/or Proposed Project arena to occur at the same time, and provides for an adaptive management approach wherein it indicates that "[e]ach such event will require a review of expected attendance, attendee travel characteristics, event start/end time, mode split, and parking demand to determine which elements of the TMP should be implemented." 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.*

Thus, while the Draft EIR appropriately does not evaluate every rare type of event or permutation of concurrent events that could occur in the project vicinity, the Event TMP is designed to address and manage the most frequent, recurring types of large events, and is flexible to less common events at the Proposed Project.

Channel-36 This comment states that concurrent events at the Proposed Project, The Forum, and the NFL Stadium would result in transit demand increases so severe that a significant transit impact would occur unless additional transit service was added. This comment offers no data or evidence to support this assertion. Draft EIR, page 3.14-480 describes the evaluation of concurrent event rail ridership and the conclusion that impacts associated with increased ridership would be less than significant. Please see Response to Comment Channel-35 for discussion of concurrent events and their potential for overlapping transit use.

Channel-37 As is described in the Draft EIR, Chapter 2, Project Description, the Proposed Project would cause three distinct changes to the existing roadway network in the project vicinity. First, it would vacate (i.e., remove) 102nd Street between South Prairie Avenue and South Doty Avenue. Second, it would vacate a portion of 101st Street west of South Prairie Avenue, causing a 340-foot discontinuity from the western edge of the retail center to the beginning of the residential area. Third, it would remove the existing traffic signal at South Prairie Avenue/102nd Street and restrict movements on 102nd Street west of South Prairie Avenue onto South Prairie Avenue to eastbound right-turns only. The effects on existing vehicle miles travelled (VMT) associated with each of these modifications are discussed below.

Vacating these streets would alter certain circulation patterns in the immediate vicinity of the Proposed Project. Some local traffic would have to change its route because these specific road segments or intersections would no longer be accessible, so drivers would have to travel on other routes to enter or leave the affected streets. Because the traffic volumes and distances that would be affected are relatively small, the overall effect on VMT would also be small. Nonetheless, there would be an incremental shift in some traffic, and a corresponding incremental change in the overall amount of VMT that the Proposed Project would generate. The following analysis estimates this incremental change, and addresses whether the incremental change would result in a new significant impact, or a substantially more severe significant impact.

As shown on Table 3.14-12, the segment 102nd Street between South Prairie Avenue and South Doty Avenue currently carries 5,660 vehicles on a weekday. Review of AM and PM peak hour turning movement volumes indicates that 80 percent of this volume turns left or right to or from South Prairie Avenue while 20 percent are through trips through the South Prairie Avenue/102nd Street intersection. Since traffic signals permitting all turn movements are present to the north and south of this segment (i.e., at 104th Street and on West Century Boulevard at Freeman Avenue and South Doty Avenue), vehicles that currently turn left or right to/from South Prairie Avenue and 102nd Street would be expected to redistribute to alternate routes that are of equal distance to their current route. The exception is the 1,130 daily east-west trips (20 percent of 5,660 daily trips) that pass through the South Prairie Avenue/102nd Street intersection. Assuming a worst-case movement of south one block, followed by north one block, they would incur a net travel distance increase of 1,340 feet based on the street spacing. This would result in a net increase of 287 daily VMT (1,130 daily trips x 1,340 feet / 5,280 feet per mile).

The restriction of movements on 102nd Street west of South Prairie Avenue to eastbound right-turns only would divert eastbound left-turns, northbound left-turns, and southbound right-turns to other routes. Note that this segment carried a modest 1,810 daily trips according to Table 3.14-12. Each of these redirected movements could finding alternate paths that are of the same travel distance. The diversion of eastbound and westbound through movements would also occur, but was considered in the previous paragraph. The only net increase in travel would be made by residents living directly along 102nd Street between South Prairie Avenue and Freeman Avenue who would no longer have full-access onto South Prairie Avenue with a traffic signal. The approximate 35 single-home homes on this segment are estimated to generate about 320 daily trips based on ITE trip rates. If it is conservatively assumed that 50 percent of these local trips (considered conservative because 34 percent of all trips on this segment are eastbound right-turn movements which would continue to be

permitted) would need to be redirected to parallel routes adding travel distance, this would result in a net increase of 59 VMT (320 x 50% x [610 feet + 1,320 feet]/5,280 feet).

Finally, vacating 101st Street between the retail center and residential uses to enable construction of the West Parking Garage would cause the redistribution of 1,140 daily trips. These trips could instead use the new public roadway to be constructed as part of the Proposed Project directly west of the West Parking Garage to access West Century Boulevard, or use 102nd Street to access South Prairie Avenue or could use Freeman Avenue to access West Century Boulevard, or use 102nd or 104th Streets to access South Prairie Avenue. The only motorists who would experience an increased travel distance would be motorists residing along 750-foot segment of 101st Street between Freeman Avenue and South Prairie Avenue. It is reasonable that these residents experience similar added travel distance to those residents on 102nd Street, which is estimated at about 1.7 daily VMT per residence. Thus, the 25 residences on this street would experience a net increase of 42 daily VMT.

The above calculations result in a net overall increase of 388 daily VMT (287 + 59 + 42 daily VMT). To put this value in perspective, it would represent one percent of the total daily VMT generated by the ancillary land uses (see Table 3.14-40 on page 3.14-137 of the Draft EIR). And it would represent one-tenth of one percent of the VMT generated by an 18,000-person NBA basketball game (see Table 3.14-42 on page 3.14-138 of the Draft EIR). The nominal VMT addition would not cause any new significant impacts related to VMT, and would not cause a substantial increase in severity in identified significant VMT impacts.

The Technical Advisory on Evaluating Transportation Impacts in CEQA (Governor's Office of Planning and Research, December 2018) is insightful to put the absolute VMT value generated by the street vacations in perspective. Page 12 of the Technical Advisory states that projects that generate 110 or fewer daily trips generally may be assumed to cause a less-than-significant transportation impact. Assuming an average of five miles of travel per trip, this corresponds to a threshold of 550 daily VMT. The VMT associated with the street vacations would be 30 percent below this threshold. Thus, a project generating 388 daily VMT would have an immaterial and clearly less-than-significant transportation impact under the Technical Advisory. Thus, the assertion that the street vacations would "significantly increase VMT" is not accurate.

Channel-38 This comment states that the conclusions of the emergency vehicle access analysis mislead the public, and ~~citing the~~asserts that there would be "catastrophic gridlock associated with 57 LOS F intersections in the Project Vicinity during concurrent events". This statement is exaggerated, out of

context, and misleading. The comment references the number of LOS F intersections (see Table 3.14-97 on page 3.14-448 of the Draft EIR) corresponding to concurrent major events at the Proposed Project, The Forum, and NFL Stadium on a weekend. As is described repeatedly in the Draft EIR, if this condition occurred, it would be a highly infrequent type of concurrent event that occurs so rarely that it would not warrant mitigation testing (see Response to Comment Channel-~~36~~ 35 for a discussion of the need for analysis of extremely rare events under CEQA). Further, in a comment specific to congestion on streets immediately surrounding the Centinela Hospital Medical Center, the comment references all impacted locations within the 20 square-mile study area, which is geographically much larger than the immediate vicinity of either the project or the hospital. In addition, the cited number of intersections includes numerous LOS F intersections on collector streets and other roadways that are not primary routes used by emergency vehicles to access CHMC. Lastly, the comment does not reflect improved conditions in some areas that would result from Proposed Project mitigation measures.

In response to this comment, data from the Draft EIR was used to calculate the number of LOS F intersections located within the project vicinity under a more typical scenario that would occur numerous times per year consisting of a Major Event at the Proposed Project. Conditions were reviewed for the most heavily traveled study period (weekday pre-event peak hour) and included implementation of recommended mitigation measures. Operating conditions associated with this scenario are depicted in Table 3.14-60. A more reasonable definition of "project vicinity" was chosen to be facilities within one mile of the Project Site in any particular direction (i.e., bounded by Manchester Boulevard, Crenshaw Boulevard, Inglewood Avenue, and Imperial Highway). Lastly, intersections included in this focused evaluation are those that are located on arterial roadways, which are most likely to be used by emergency vehicles. These selection criteria yielded 54 total study intersections. During the specified time period and operating conditions, 16 of the 54 intersections are projected to operate at LOS F. Thus, a more realistic characterization of LOS F conditions in the project vicinity would be 16 intersections, not 57 intersections.

The Local Hospital Access Plan described in Chapter 10 of the Event TMP specifically includes measures to be implemented by the project applicant to reroute emergency vehicles traveling on eastbound West Century Boulevard to instead use Inglewood Avenue to access CHMC (see Draft EIR, Appendix K.4, Event TMP, Figure 11). Similarly, Event TMP Figures 12 and 13 include alternative vehicle routing from the east, northeast, southeast, and south of CHMC to access the medical center without traveling through the LOS F intersections along West Century Boulevard. This is important because 10 of the 16 LOS F intersections for the aforementioned scenario are located along West

Century Boulevard between Inglewood Avenue and Crenshaw Boulevard. By virtue of routing emergency vehicles away from that particularly congested part of the corridor, emergency vehicle response times would be improved. Rather than the 57 LOS F intersections mentioned in the comment, this focused analysis concludes that there would be no more than six LOS F intersections within the project vicinity.

The above exercise was repeated under a scenario in which concurrent weekday evening major events are held at the Proposed Project and The Forum with recommended mitigation measures in place. During the pre-event peak hour, 26 of the 54 intersections would operate at LOS F for the given scenario according to Table 3.14-98. Eight of the ten additional LOS F intersections (beyond those for the Proposed Project only scenario described above) within the project vicinity were located on Manchester Boulevard near The Forum.

It is informative to review the Local Hospital Access Plan emergency vehicle routing maps against the intersections projected to operate at LOS F. The conditions emergency vehicles could experience when traveling on these detour routes during concurrent Proposed Project and The Forum major events are described below.

Figure 11 of the Event TMP shows that emergency vehicles from the west would be rerouted from eastbound West Century Boulevard, to northbound Inglewood Avenue, and to eastbound Hardy Street to access the CHMC campus. Once the emergency vehicle passes through the Century Boulevard/Inglewood Avenue intersection, it is about a one-mile trip to CHMC on two-lane streets with on-street parking. The majority of the trip would be along Hardy Street, which is a two-lane collector street that is approximately 35 feet wide. According to Figure 3.14-12, Hardy Street carries about 5,000 trips per day, or about 500 vehicles (both directions) during the peak hour. Along this one-mile route, a series of all-way stop intersections and two traffic signals are present (at La Brea Avenue/Hardy Street and Hardy Street/Myrtle Avenue). By using their sirens and lights, emergency vehicle drivers would be able to traverse the all-way stop intersections and pass stopped traffic pulled over to the curb with ease.

Under Adjusted Baseline conditions with concurrent major events at the Proposed Project and The Forum (see Table 3.14-98 on page 3.14-462 of the Draft EIR), the La Brea Avenue/Hardy Street intersection is projected to operate at LOS C or better for all three study periods with the Proposed Project mitigation program. Thus, this intersection would be under capacity and emergency vehicles would have no problem passing through it. The Hardy Street/Myrtle Avenue signalized intersection is at the junction of two collector streets, and also is projected to be under capacity during these periods (see Table 3.14-98 on page

3.14-462 of the Draft EIR). Thus, the detour route from the west would incur a single LOS F intersection in the project vicinity, which is West Century Boulevard/Inglewood Avenue. Under Adjusted Baseline conditions with concurrent major events at the Proposed Project and The Forum, this intersection is projected to operate at LOS F during the weekday pre-event and post-event peak hours, and LOS E during the weekend pre-event peak hour. Event-related traffic management at this intersection is discussed in more detail below.

Page 37 of the Event TMP notes that the CHMC website recommends using West Century Boulevard to access the CHMC campus from the west. However, based on their trip origin, some motorists may instead use Manchester Boulevard to access the CHMC campus. For motorists traveling eastbound on Manchester Boulevard, Figure 11 of the Event TMP recommends they use La Brea Avenue to access CHMC versus continuing to South Prairie Avenue. This would enable emergency vehicles to avoid passing through a LOS F condition at the Manchester Boulevard/South Prairie Avenue intersection. The La Brea Avenue detour route would not include any intersections operating at LOS F. However, during concurrent events at the Proposed Project and The Forum, it may be necessary to modify this detour to instead use Inglewood Avenue, as Table 3.14-98 indicates LOS F conditions are expected at Manchester Boulevard/La Brea Avenue. Figures 11, 12, and 13 are not intended to depict emergency vehicle routing under concurrent events. Strategies for addressing these atypical situations are discussed in Chapter 11 of the Event TMP, and include the need for coordination between the City and each venue operator to implement appropriate traffic management strategies.

Figure 12 of the Event TMP shows that emergency vehicles from the east would be advised to use westbound Florence Avenue (instead of Manchester Boulevard), and then turn left at La Brea Avenue. This enables emergency vehicles to avoid passing through a LOS F condition at the Manchester Boulevard/South Prairie Avenue intersection. According to Table 3.14-60, intersections along the detoured Florence Avenue route are projected to operate at LOS E or better when there is a major event at the Proposed Project (but no event at The Forum). But when a major event is held at The Forum, many of these intersections degrade. As indicated in Table 3.14-98, the vast majority of the added delay at these intersections is caused by The Forum, and not the Proposed Project. Therefore, a proper characterization of conditions along the Florence Avenue detour route shown on Figure 12 is that this route would be generally free-flow when there is a major event at the Proposed Project (but no event at The Forum), but when there is an event at The Forum, this route becomes congested and emergency vehicles would need to traverse multiple LOS F intersections. In summary, the detour route shown in Figure 12 would work acceptably when there is only an event at the Proposed Project. This route

would not be ideal for emergency vehicles if a major event is held at The Forum (regardless of whether the Proposed Project is also hosting an event).

The prior paragraph describes a specific circumstance (concurrent Forum and Proposed Project major events) that would require advanced coordination to accommodate an emergency vehicle traveling toward CHMC from the east. Under such a circumstance, West Century Boulevard, Manchester Boulevard, and Florence Avenue would each have multiple LOS F intersections. Emergency vehicles may need to find an alternate route such as a collector or residential street to travel westbound. For instance, to bypass congestion on westbound West Century Boulevard, an emergency vehicle could instead use a combination of collector streets such as Yukon Avenue, Doty Avenue, 104th Street, or 108th Street. Additionally, it is noted that NFL football games played at the NFL Stadium may have similar congestion effects. Thus, since the NFL Stadium will be opening in 2020, emergency vehicle drivers would have opportunities to find the quickest routes to avoid event-related congestion well in advance of the opening of the Proposed Project. Impact 3.14-31 on page 3.14-482 of the Draft EIR, describes the emergency access impacts associated with concurrent events. It properly concludes, based on the above discussion and other considerations, that emergency vehicle access impacts would be significant and unavoidable under concurrent events.

Figure 13 of the Event TMP shows that emergency vehicles from the south would be rerouted from South Prairie Avenue to Hawthorne Boulevard. According to Table 3.14-60, emergency vehicles on this route would incur two LOS F intersections (West Century Boulevard/Hawthorne Boulevard/La Brea Avenue during weekday and weekend pre-event peak hour and Hawthorne Boulevard/West 104th Street during weekday pre-event peak hour). A note is included on Figure 13 indicating that congestion in the northbound direction of Hawthorne Boulevard at West Century Boulevard would be primarily in the outside travel lane (in anticipation of turning right). This would enable emergency vehicles to bypass this congestion by using the inside travel lane to cross West Century Boulevard. The LOS F condition at Hawthorne Boulevard/West 104th Street intersection is due to northbound queue spilling back from Century Boulevard. Emergency vehicles could bypass this congestion by using the inside through lane.

Prior to reaching the project vicinity, emergency vehicles that are destined for the CHMC Campus from the west via the I-405/West Century Boulevard interchange would encounter LOS F conditions at the interchange under Adjusted Baseline Plus Proposed Project (Major Event) pre-event peak hour conditions. To address this congestion and mitigate project impacts, Mitigation Measure 3.14-3(c) on page 3.14-211 of the Draft EIR, requires the project

applicant to work with Caltrans to restripe the center lane on the I-405 northbound off-ramp from a left-turn only lane to a shared left/right lane. Additionally, Mitigation Measure 3.14-3(j) on page 3.14-216 of the Draft EIR, requires the project applicant to work with Inglewood and the City of Los Angeles to add a second left-turn lane on the southbound La Cienega Boulevard approach to Century Boulevard. Finally, Mitigation Measure 3.14-3(o) requires the project applicant to coordinate traffic signals along West Century Boulevard and La Cienega Boulevard to accommodate major event traffic flows.

Table 3.14-60 indicates the combined effects of these mitigation measures would be improved LOS from F to D at the I-405 SB off-ramp/La Cienega Boulevard intersection (north of West Century Boulevard). Although operations at the West Century Boulevard/La Cienega Boulevard and West Century Boulevard/I-405 NB off-ramp intersections would remain at LOS F, these mitigation measures would directly benefit emergency vehicles by providing more lanes through these intersections so that they may pass more easily. With the mitigation measures in place, dual left-turn lanes would exist on southbound La Cienega Boulevard approaching West Century Boulevard, and two lanes would be provided for right-turns on the northbound I-405 off-ramp. These modifications provide more flexibility and physical space for emergency vehicles to navigate through traffic. Lastly, it is noted that the eastbound West Century Boulevard approach to the I-405 NB off-ramp intersection features a striped median, which would enable emergency vehicles to pass in the opposing lanes.

Emergency vehicles traveling eastbound on West Century Boulevard that would be directed via wayfinding guidance to turn left at Inglewood Avenue may incur delays due to eastbound event-related congestion. If the emergency vehicles could access the beginning of the 270-foot eastbound left-turn lane without undue delays, they can cross over the striped centerline to access the opposing lane to turn onto northbound Inglewood Avenue. But if more severe queuing exists, that condition should be noticeably and emergency vehicles would be able, if necessary, to travel in the opposing direction of Century Boulevard to travel from Felton Avenue to Inglewood Avenue. In summary, there are several options to allow emergency vehicles traveling from the west to access the CHMC via the detour route shown on Figure 11 of the Event TMP without experiencing undue delays.

The last part of this comment suggests that TCOs would need to retrieve and manually erect traffic barriers to facilitate emergency access and that the time required to do so would significantly delay emergency vehicles. This is a misinterpretation of the statement in the Draft EIR that TCOs could move temporary barriers to allow emergency vehicles to pass (see Draft EIR, pages 3.14-250 and 3.14-297). This statement was not intended to mean that TCOs

would be manually erecting traffic barriers to allow emergency vehicles to pass; rather, its intent was that TCOs could move traffic barriers out of the way of emergency vehicles, which can be done as they see an emergency vehicle approaching.

Channel-39 The Draft EIR concludes that Proposed Project effects on emergency access would be less than significant (after mitigation) for events at the Proposed Project (see Impact 3.14-14 on page 3.14-249 of the Draft EIR), but significant and unavoidable for concurrent events (see Impact 3.14.-31 on page 3.14-482 of the Draft EIR). The primary emergency access concern relates to persons being transported to CHMC in ambulances as these are typically more life-threatening conditions than persons being transported to the hospital by private vehicle. However, access needs for both emergency vehicles and private vehicles are described in Mitigation Measure 3.14-14 because its effectiveness would apply to both groups.

Response to Comment Channel-38, above, includes a thorough discussion of the rationale and benefits of the CHMC vehicle routing detours. Event TMP Figure 11 (see Draft EIR, Appendix K.4) specifically shows four intersections where real-time traveler information guidance (via blankout signs) would be provided. One of the most critical signs would be located on eastbound West Century Boulevard approaching Inglewood Avenue. If this sign was coordinated with a loop detector on eastbound West Century Boulevard east of Myrtle Avenue, the loop detector could sense queued vehicles, and communicate this to the real-time sign, which would then advise motorists desiring to access CHMC to turn left at Inglewood Avenue. These types of technologies, which would benefit both emergency vehicles and private vehicles alike, are commonplace. They have been used to provide travel time updates and to advise motorists of stopped traffic ahead.

The core element of Mitigation Measure 3.14-14 would be the real-time wayfinding program. This, along with quarterly meetings with CHMC representatives and best practices employed by TCOs to accommodate emergency vehicles present on congested corridors, form the basis of the less-than-significant finding regarding emergency vehicle access impacts. The current practice of using real-time wayfinding is borne out of more than 25 years of research on Advanced Traveler Information Systems (ATIS). Such systems can be found in central cities en route to arenas, on interstate freeways, and in rural areas approaching national parks. In light of all this information, the conclusion that emergency vehicle impacts related to Proposed Project events (excluding Concurrent Event scenarios) would be less than significant is supported by substantial evidence.

The statement that Mitigation Measure 3.14-14 improperly defers the formulation of actions to address this impact is incorrect. Transportation management plans of this sort are designed to be dynamic, so that they can be adjusted and refined as information is obtained and issues are addressed. Although such plans have been the subject of deferral claims, such claims have been uniformly unsuccessful in the courts.

It should be noted that the City of Inglewood met with CHMC officials on two occasions to discuss the Proposed Project impacts on emergency access and Mitigation Measure 3.14-14, which would require that the City and the hospital work together to develop and implement the Local Hospital Access Plan. The first meeting occurred on August 30, 2019. At this meeting, CHMC officials stated that they welcomed the opportunity to work with the City on this plan.[51] At a follow-up meeting on March 3, 2020, City officials met with CHMC officials to review the draft emergency access plan; at this meeting, CHMC officials repeated their willingness to work with the City to implement the Plan.

Channel-40 The Draft EIR correctly states that that noise impacts under Alternative 2 would be substantially the same as under the Proposed Project. The dominant noise characteristics of the Proposed Project include traffic, noise emitting from the arena events, and crowd noise in and around the plaza. The open-air restaurant is one contributor to post-event operational noise, however the dominant source of noise on the Project Site is the outdoor plaza with outdoor stage events. Under Alternative 2, the plaza buildings, including the upper-level restaurant, would be removed; however, removal of the plaza buildings would eliminate features that block and thus mitigate the transmission of noise from crowds of people gathered in the plaza. The removal of buildings that under the Proposed Project tend to block the transmission of plaza-generated noise off the Project Site would tend to exacerbate noise levels at nearby sensitive receptors.

Traffic noise is relatively insensitive to minor changes in levels of congestion; a rule of thumb is that it takes a 50 percent increase or decrease in traffic levels in order to generate an audible (3 dBA) change in noise levels. This is largely due to the fact that as traffic increases, it also slows, and when traffic decreases, it tends to increase in speed. The faster vehicles travel, the greater the noise generated by engines and tire noise. Thus, while traffic would be reduced by approximately 3 percent, the associated reduction in noise generation would be inaudible.

The Draft EIR analysis of Alternative 2 reflects that in this alternative the noise contribution from the rooftop restaurant and inconsequential negligible change

[51] Mohammad A. Naser, CHMC Chief Operating Officer/Interim Chief Executive Officer, Letter to Mindy Wilcox, Planning Manager, City of Inglewood, August 21, 2019.

in traffic noise would be removed, but noise generated by amplified sound and crowd noise in the Plaza would be exacerbated compared to the Proposed Project due to the removal of the noise-shielding of the Plaza buildings. ~~[A]although t~~he exact changes that would occur would depend both on the amount of noise attenuation that would result from the final design of the Plaza buildings to be removed, and the configuration of sound generation from events and activities in the Plaza under Alternative 2. But the likelihood is that the unattenuated noise generated in the Plaza would be comparable to the noise generated from the stage in the Proposed Project, which would create impacts greater than the noise contributed from sources that would be removed from Alternative 2. Thus, the assessment of noise impacts under Alternative 2 is reasonable and accurate, and does not mislead the public's understanding of the environmental characteristics of Alternative 2. To reflect these uncertainties, the Draft EIR, page 6-30, first full paragraph, the third sentence is revised to read:

> As such, affected sensitive receptors, especially those located to the northwest of the intersection of South Prairie Avenue and West Century Boulevard, as well as homes that are located south and west of the Arena, west of South Prairie Avenue and south of West 102nd Street, as well as the hotel use at 3900 West Century Boulevard would likely all be exposed to ~~substantially~~ higher levels of noise than disclosed for the Proposed Project (Impacts 3.11-2 and 3.11-6).

Please also see Response to Comment Channel-22 for additional discussion of the analysis of noise from the proposed rooftop restaurant, including potential noise reducing design features.

Channel-41 The discussion of transportation effects of Alternative 2 disclosed that significant and unavoidable traffic impacts from ancillary land uses without events would be avoided under this alternative. As discussed on page 6-29 of the Draft EIR, the elimination of the ancillary uses in Alternative 2 would avoid the significant impacts identified for the Proposed Project's ancillary uses and hotel at study area intersections and along neighborhood streets. The Draft EIR acknowledged that these impacts would occur in the typical weekday AM and PM peak hours. In fact, on page S-28 of the Draft EIR, the Draft EIR acknowledges that the operation of ancillary uses is "the most common scenario" for transportation impacts of the Proposed Project and that the impacts of the ancillary uses would occur on a "daily" basis.

In order to provide additional clarification in the analysis of Alternative 2, Draft EIR, page 6-29, third paragraph is revised to read:

> The elimination of the ancillary uses in Alternative 2 would avoid the most common significant impacts identified for the Proposed Project's ancillary uses and hotel which would occur on a daily basis at intersections and neighborhood streets (Impacts 3.14-1 through 3.14-6, Impacts 3.14-16 through 3.14-21, Impacts 3.14-28, and 3.14-33).

Channel-42 As described on page 6-28, under Alternative 2 the Draft EIR addresses GHG emissions from both construction and operation of the Proposed Project as among those that would be less severe than the Proposed Project. The Draft EIR provides a clear and substantive description of the manner in which the construction and operational GHG emissions of Alternative 2 would differ from those of the Proposed Project, and while concluding that the GHG emissions of Alternative 2 would be "similar to" but less than the Proposed Project, acknowledges that GHG emissions would be somewhat decreased as a result of decreased construction and traffic. As explained on page 6-28 of the Draft EIR, under Alternative 2, the capacity of the Arena Structure would be reduced to 17,500 and the other proposed ancillary uses (i.e., retail shops, outdoor stage, team practice facility, sports medical clinic, team offices) on the Arena Site, and the planned parking structure and hotel on the East Transportation Site, would be eliminated. In total, approximately 635,250 square feet of built space would be eliminated from the Proposed Project as originally proposed under Alternative 2,[52] which equates to about a 20 percent reduction in overall built space. The Draft EIR acknowledged that elimination of these uses would result in "a corresponding decrease in criteria pollutant emissions, localized maximum daily operational emissions (NO_2), and GHG emissions."

More specifically, under Alternative 2, construction-related GHG emissions would be reduced by a maximum of 20 percent. As shown in Table 3.7-7 on page 3.7-52 of the Draft EIR, GHG emissions during construction of Proposed Project are estimated at 18,078 metric tons of carbon dioxide equivalent (MT CO2e), and a 20 percent reduction equates to about 3,600 MT CO2e. As shown in Table 3.7-9a starting on page 3.7-54 of the Draft EIR, GHG emissions during construction and operation of the Proposed Project over its 30-year lifetime would total 562,310 MT CO2e. Thus, a reduction of 3,600 MT CO2e under Alternative 2 would reduce total emissions by approximately 0.6 percent.

The Draft EIR also explains that Alternative 2, like the Proposed Project, would require implementation of Mitigation Measure 3.7-1(a), which would include

[52] The reduction would include elimination of all plaza uses, the hotel, the administrative offices, sports medicine clinic, practice facilities, the East Parking Structure, and approximately 3 percent of space in the Arena Structure.

the implementation of a GHG reduction plan, and Mitigation Measure 3.7-1(b), which would require the preparation of an annual GHG verification report to determine the number of GHG offsets required to bring the Proposed Project below the no net new GHG emissions threshold of significance.

Channel-43 The analysis of Alternative 2 in the Draft EIR distinctly characterizes those aspects of the noise impacts of Alternative 2 that would be similar to, less than, and greater than those of the Proposed Project. On page 6-27 of the Draft EIR, it is acknowledged that the traffic noise and the impacts associated with exposure to aircraft noise would be the same under Alternative 2 as under the Proposed Project. On page 6-29 of the Draft EIR, it is explained that the reduced amount of construction under Alternative 2 would reduce construction generated noise and vibration impacts as compared to those of the Proposed Project and on page 6-30 of the Draft EIR, it is explained that the impacts of noise generated by pre- and post-event activities in the Plaza, including amplified sound from concerts and other plaza activities, would be exacerbated by the removal of the plaza structures, which under the Proposed Project serve to block the transmission of noise from the plaza to nearby uses, especially those to the west of the Project Site.

Commented [U13]: Global comment: check for consistency.

As discussed above in Response to Comment Channel-40, the dominant source of noise on the Project Site would be the outdoor plaza with an outdoor stages. Removing the Plaza buildings, including the rooftop restaurant, would remove one noise source, but would allow more people to gather in the Plaza while waiting to enter the arena, and amplified noise would still be possible through the use of temporary, mobile sound amplification systems. Thus any decrease in noise due to the removal of the rooftop restaurant ~~is likely to be would be more than~~ offset by increased crowd and other Plaza noise. In addition, the removal of the Plaza buildings would result in noise sources in the Plaza having a more expanded direct line-of-sight with sensitive receptors to the northwest, west, and southwest than under the Proposed Project. Please also see Response to Comment Channel-21 for additional discussion of the noise-attenuating characteristics of the Plaza design. For these reasons, the Draft EIR objectively and accurately describes the ways in which Alternative 2 would result in greater noise impacts than would the Proposed Project.

Commented [U14]: Suggested for consistency with other language.

Channel-44 The analysis of Alternative 2 in the Draft EIR distinctly characterizes those aspects of the transportation impacts of Alternative 2 that would be similar to, less than, and greater than those of the Proposed Project, and in doing so provides an analysis of the comparative impacts of Alternative 2 that is both complete and clear. On page 6-27 of the Draft EIR, it is acknowledged that while the traffic from major events at the Arena would be reduced by about 3 percent under Alternative 2, "[t]his slight reduction in trips would not materially reduce the significant impacts found for the Proposed Project on intersections,

neighborhood streets, and freeway facilities under either Adjusted Baseline or Cumulative conditions with or without concurrent events at The Forum or the NFL Stadium (Impacts 3.14-1 through 3.14-9, Impacts 3.14-16 through 3.14-24, Impacts 3.14-28 and 3.14-29, and Impacts 3.14-33 and 3.14-34)." The impacts to on-time performance of local buses, construction impacts, and impacts to emergency access to the Centinela Hospital Medical Center would be the essentially same under Alternative 2 as under the Proposed Project.

On page 6-29 of the Draft EIR, it is explained that the elimination of ancillary uses under Alternative 2 would avoid significant impacts at intersections and neighborhood streets as compared to those of the Proposed Project. This would eliminate all net new ancillary trips shown in Table 3.14-14 in the Draft EIR (4,706 daily trips, 294 trips during the AM peak hour, and 409 trips during the PM peak hour), which would eliminate Impacts 3.14-1, 3.14-4, 3.14-16, and 3.14-19. It is also explained that the "slight reduction in venue capacity would reduce the significant VMT impacts identified for events at the venue, but not to a less than significant level." Please also see Response to Comment Channel-46 for further discussion of the transportation effects of removal of the ancillary uses under Alternative 2.

Draft EIR, page 6-30, under the header of "Impacts Identified as Being More Severe than the Proposed Project," acknowledges that "[a]lthough few of the impacts of the Reduced Project Size Alternative would be more severe than those of the Proposed Project," and that there would be ways in that Alternative 2, by eliminating the consolidation of LA Clippers team uses on the site "would likely increase the amount of travel between these uses that are currently located disparately throughout the region."

The statement on page 6-30 of the Draft EIR that "few of the [transportation] impacts of the Reduced Project Size Alternative would be more severe than those of the Proposed Project" is objective and accurate. The comment specifically mentions traffic impacts associated with ancillary land uses and those associated with concurrent events. As discussed on page 6-29 of the Draft EIR, the elimination of the ancillary uses under Alternative 2 would avoid the significant impacts identified for the Proposed Project's ancillary uses and hotel at intersections and neighborhood streets. In addition, as discussed on page 6-27 of the Draft EIR, traffic impacts during concurrent events under Alternative 2 would be the same as impacts under the Proposed Project.

With respect to VMT, LOS, and emergency access, as discussed on page 6-30 of the Draft EIR, Alternative 2 would likely increase the amount of travel as LA Clipper team facilities would be located disparately throughout the region with the arena being located in Inglewood and the team's offices and practice facility

remaining located in Downtown and West Los Angeles, respectively. As a result, team employees would be required to drive back and forth between the arena and these existing facilities, thus resulting in more VMT than would be generated if all the facilities were co-located. Contrary to the assertion in the comment, the Draft EIR acknowledges that LOS impacts would be reduced under the ancillary use scenarios when no events would occur at the proposed Arena. As discussed above under Response to Comment Channel-41, the Draft EIR states that elimination of the ancillary uses under Alternative 2 would avoid "the significant impacts identified for the Proposed Project's ancillary uses and hotel at intersections and neighborhood streets (Impacts 3.14-1 through 3.14-6, Impacts 3.14-16 through 3.14-21, Impacts 3.14-28, and 3.14-33)."

The assertion that impacts with respect to emergency access would be reduced under Alternative 2 is incorrect. Impacts on emergency access are attributable to traffic generated by major events at the proposed Arena. There would be no significant impacts related to emergency access that would be avoided or substantially lessened under Alternative 2. The potential impact on emergency access to the Centinela Hospital Medical Center would be essentially the same as the Proposed Project as only a small portion of overall traffic during major events would be reduced from the elimination of ancillary uses. As a result, Alternative 2 would not substantially reduce the amount of traffic on roadways between the arena and the CHMC during major events, and these impacts would be of the same magnitude as those described for the Proposed Project.

Finally, model runs were not required to substantiate the conclusions made in the discussion of traffic impacts under Alternative 2. Pursuant to CEQA Guidelines section 15126.6(d), an EIR is required to "include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." The Draft EIR meets this standard. The analysis of the transportation effects of Alternative 2 was undertaken by the same professional transportation planners and engineers who prepared the voluminous and detailed analysis of transportation impacts of the Proposed Project presented in Draft EIR, Section 3.14, Transportation and Circulation. The conclusions presented in the discussion of Alternative 2 are based on their professional assessment and calculations of the ways in which Alternative 2 would change the transportation characteristics of the Proposed Project. As such, the content of the analysis of Transportation and Circulation for Alternative 2 meets the standards of substantial evidence provided in CEQA Guidelines section 15384, which defines substantial evidence as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached," and goes on to state that "[s]ubstantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion

supported by facts." There is no requirement under CEQA that analysis of alternatives be supported by any particular type of analytical undertaking, including "model runs." Rather, the analysis of the transportation impacts of Alternative 2 is supported by substantial evidence in the record. The transportation analysis of Alternative 2 in the Draft EIR meets professional standards for such analyses and is considered sufficient.

Channel-45 The statement on page 6-30 of the Draft EIR stating that "it is notable that Alternative 2 would fail to respond to several policies of the City of Inglewood General Plan which encourage the development of employment-generating uses in the City," was inadvertently included in the assessment of ways in which the transportation effects of Alternative 2 would be more severe than those of the Proposed Project. As such, Draft EIR, page 6-30, second full paragraph, the first sentence is revised to read:

> Although few of the impacts of the Reduced Project Size Alternative would be more severe than those of the Proposed Project, ~~it is notable that Alternative 2 would fail to respond to several policies of the City of Inglewood General Plan which encourage the development of employment-generating uses in the City. Further,~~ by eliminating the potential to consolidate LA Clippers team uses, including the arena, practice facility, sports medicine and treatment facilities, and team offices in a single location, Alternative 2 would likely increase the amount of travel between these uses that are currently located disparately throughout the region.

The consistency of the Proposed Project with goals and policies contained in the City of Inglewood General Plan is provided in Draft EIR, Section 3.10, Land Use and Planning, and in other topical sections. As it pertains to the goals of the Land Use Element, three of which are quoted in the comment, and all of which are presented on pages 3.10-21 to 3.1-23 of the Draft EIR, the discussion on page 3.10-34 of the Draft EIR notes that "[w]ith the amendments that are included as part of the Proposed Project, the Proposed Project would be consistent with the Land Use Element goals and objectives included in the City of Inglewood General Plan." Related to Alternative 2, the Draft EIR on page 6-26 states that "[l]ike the Proposed Project, Alternative 2 would have less-than-significant impacts related to land use and planning (Impacts 3.10-1 through 3.10-4)."

The focus of the analysis of the Proposed Project in relation to the goals of the Land Use Element of the City's General Plan is in response to the significance criterion that denotes that a significant impact would occur if the Proposed Project would "[c]ause a significant environmental impact due to a conflict with

any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect." Thus, the analysis in the Draft EIR is focused on the ways that any potential inconsistency with the General Plan could result in an adverse physical environmental impact. The City staff, in their staff report related to the merits of the Proposed Project, will provide a comprehensive analysis of the consistency of the Proposed Project with the goals and policies of the City of Inglewood General Plan, including policies that relate to non-environmental issues such as economic and social conditions. The Inglewood City Council, if it decides to approve the Proposed Project, would ultimately make the determination as to the consistency of the Proposed Project with the goals and policies of the General Plan and other related plans and ordinances of the City of Inglewood.

Nevertheless, the following discussion addresses the comparative analysis of how the Proposed Project and Alternative 2 would relate to three goals of the Land Use Element of the General Plan included in the comment.

The first quoted goal is a Land Use Element General goal that states "Provide for the orderly development and redevelopment of the City while preserving a measure of diversity among its parts. Allocate land in the City to satisfy the multiple needs of residents but recognize that land is a scarce resource to be conserved rather than wasted" (see Draft EIR, page 3.10-21). The Proposed Project would provide for the development of the Arena along with related LA Clippers facilities and associated support retail and community uses. In addition, it would provide for the replacement of a hotel that would be removed from the Arena site. Because the uses in the Proposed Project would be interrelated and would be complimentary uses serving visitors to the Proposed Project and project vicinity, the Proposed Project would not be inconsistent with this goal. Conversely, Alternative 2 would eliminate uses that are complimentary to the Arena Structure and the replacement of a hotel that already exists on the Project Site. Because Alternative 2 would be a less intensive use of the Project Site, and would provide fewer job opportunities to City residents, Alternative 2 would be less responsive to "the multiple needs of residents," and the Proposed Project would be more responsive to the goal's guidance to "recognize that land is a scarce resource to be conserved rather than wasted." As such, compared to the Proposed Project, Alternative 2 would be less responsive to this goal than the Proposed Project.

The second Land Use Element General goal listed by the comment directs the City to "[h]elp promote sound economic development and increase employment opportunities for the City's residents by responding to changing economic conditions." While it is the opinion of the commenter that economic development under Alternative 2 would be more "sound" than under the

Proposed Project because of the elimination of impacts associated with ancillary uses and LA Clippers team offices and clinics, the evidence from the analysis of Alternative 2 indicates that the vast majority of environmental impacts, largely driven by the many major events that would take place at the almost equal-sized arena, would still occur. However, employment opportunities at the Project Site would be materially decreased under Alternative 2.

Contrary to the assertion in the comment, the Draft EIR provides clear information on the level of employment associated with the uses that would be removed under Alternative 2. According to information provided in Table 2-4 on page 2-51 of the Draft EIR, the Arena would only employ 75 full-time employees while employment on the Project Site that would be removed under Alternative 2 include LA Clippers business operations (200), as well as restaurant, plaza uses, and hotel employees (439). Table 2-4 provides the public with the information on employees necessary to determine what the true difference in employment would be between the Proposed Project and Alternative 2.

Finally, the last Land Use Element Residential goal listed by the comment states "[s]afeguard the City's residential areas from the encroachment of incompatible uses." The uses in the Proposed Project would not be inherently "incompatible" with nearby residential and commercial uses. In fact, the project area has long been a part of the City of Inglewood in which visitor-serving uses, such as The Forum and the Hollywood Park Racetrack, operated in proximity to neighborhoods and commercial corridors. The suggestion in the comment that residences to the northwest of the Project Site would experience decreased impacts under Alternative 2 is unsupported by evidence, and is contrary to evidence in the record which identifies significant noise impacts to the north- and southwest of the Project Site that would be exacerbated by removal of Plaza structures that would serve to block the transmission of noise from the Plaza area. As described above under Response 43, removal of the Plaza building, and therefore the rooftop restaurant, would result in an increase in noise at sensitive receptor locations to the northwest as the removal of the plaza building would result in noise sources in the plaza having a more expanded direct line-of-sight with these receptors. Thus, the assertion that Alternative 2 would be more responsive to this goal than the Proposed Project is unsupported by evidence in the record.

Channel-46 The Draft EIR conclusions regarding Alternative 2 VMT impacts are not inconsistent; rather, the Draft EIR discusses different aspects of Alternative 2 impacts on VMT relative to the Proposed Project. Draft EIR, page 6-29 discusses specific VMT impacts of Alternative 2 that would be less severe than those identified for the Proposed Project, related specifically to slight reductions

in the significant VMT impacts for events and avoiding the significant VMT impacts identified for the Proposed Project's hotel use. Draft EIR, page 6-30 discusses specific VMT impacts of Alternative 2 that would be more severe than those identified for the Proposed Project, in particular related to two aspects of project-related travel: (1) travel between the various LA Clippers team facilities since the practice facility and team offices would remain in separate locations throughout the Los Angeles region under Alternative 2, and (2) travel related to the elimination of on-site ancillary uses which daytime employees and event attendees would otherwise patronize.

The comment misstates the VMT data presented on pages 3.14-137 and 3.14-244 of the Draft EIR, and inaccurately implies that the Draft EIR determined that there would be a reduction of 5,694 weekday VMT for employees. The 5,694 work trip VMT associated with the office, sports medicine clinic, and practice facility shown on Table 3.14-40 on page 3.14-137 of the Draft EIR is a total for the weekday employee work trip VMT at the Project Site; it is not presented as a reduction value. The comment also inaccurately states that "the DEIR concludes that consolidation would reduce per-employee VMT from 18.6 to 15". The 18.6 daily work VMT per employee referenced on page 3.14-244 of the Draft EIR is the regional daily work VMT per employee from the Southern California Association of Governments regional travel demand model; it is not a number for LA Clippers or other employees in the Proposed Project, and the Draft EIR does not conclude that consolidation would reduce employee VMT from 18.6 to 15.

The comment states that "there is no reason to assume that removal of ancillary land uses would increase VMT because the Adjusted Baseline includes numerous existing and proposed food and drink establishments in the Project vicinity." This comment, which cites text on page 6-30 of the Draft EIR, fails to note that the specified VMT increases would be for two specific groups: daytime employees, and event attendees. Daytime employees would be more likely to travel off-site for lunch, errands, etc., and could travel by auto for such trips; hence, their VMT could increase. The VMT for event attendees could increase, albeit slightly, due to the lack of any food and drink establishments on-site. They may instead choose to stop at a nearby establishment before or after the event, which could marginally increase VMT, depending on the extent to which the chosen establishment is a detour along their route to the Project Site.

The comment states that it is reasonable to assume that Clippers employee travel between disparate administrative offices and practice facilities and the arena on event days would be via carpool or shared transportation such as charter bus. This statement is unsupported by evidence in the record and represents the commenter's opinion. Under Alternative 2, wherein LA Clippers administrative

offices remain in downtown Los Angeles and the LA Clipper practice and training facility remains in Playa Vista, while some staff may travel via carpool or transit, travel demand modeling undertaken and reported in Draft EIR, Section 3.14, Transportation and Circulation, determined that it is much more likely and reasonable to assume that LA Clippers and other employees who drive to work at those disparate locations would likely drive to the Alternative 2 arena to work the game and then drive directly home after the game.

Channel-47 Pursuant to CEQA Guidelines section 15126.6(a), "[a]n EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, *which would feasibly attain most of the basic objectives of the project* but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" [emphasis added]. Guideline 15126.6(b) directs that the analysis of alternatives focuses on alternatives that can avoid or substantially lessen the significant impacts of the project "even if these alternatives would impede to some degree the attainment of the project objectives." Guideline 15126.6(f) reiterates that an EIR "need examine in detail only the ones [alternatives] that the lead agency determines could feasibly attain most of the basic objectives of the project." Thus, the discussion of the relationship of an alternative to the project objectives, included in the analysis of each of the seven alternatives considered fully in the Draft EIR, is not meant as a means to determine that an alternative is infeasible, but simply intended to provide the City's initial observations about the attainment of the objectives by the alternative in question compared to that of the Proposed Project.

The discussions of the relationship of each alternative to the project objectives in Draft EIR, Chapter 6, Project Alternatives are based on substantial evidence about the description and relative impacts of the Proposed Project and each alternative that are presented throughout the Draft EIR; the alternative is correct in its assessment that Alternative 2 does not meet various project objectives. In the discussion of the relationship of Alternative 2 to the project objectives, it is noted that the alternative would "meet some, but not all" of the City's and the project applicant's stated objectives for the Proposed Project, presented in Draft EIR, Chapter 2, Project Description, pages 2-4 through 2-6 and again in Draft EIR, Chapter 6, Project Alternatives, pages 6-3 through 6-5. The comment raises questions about the City's conclusions regarding the relationship of Alternative 2 to City Objectives 2, 4, 7 and 10, and project applicant objectives 1e, 1f and 2d.

With respect to City Objective 2, which indicates the City's desired outcome that the Proposed Project "promotes the City's objectives related to economic development, and that enhances the general economic health and welfare of the

City by encouraging viable development, stimulating new business and economic activity, and increasing City revenue (property, sales, admissions and transient occupancy taxes)," the comment posits that "the Draft EIR fails to consider that there are hundreds of thousands of square feet of retail and restaurant space proposed and existing within the Project vicinity, allowing the City to capture development benefits regardless of whether those uses are developed with the arena." City Objective 2, like all of the other Project Objectives identified in the Draft EIR, appropriately pertains to the City's desired outcomes for the Proposed Project; the objectives do not represent objectives that necessarily apply to areas of the City that are not included within the Project Site. In essence, the comment suggests that the Project Objectives are the equal of City policies, as may be reflected in the General Plan or other long-term planning documents. In this case, Alternative 2, by eliminating the additional retail, office, and hotel facilities, would result in less economic activity on the Project Site compared to that which would occur under the Proposed Project. Alternative 2 would generate less business activity on the Project Site than the Proposed Project, and would not generate as much City revenue as the Proposed Project. Therefore, the assertion in the Draft EIR that Alternative 2 would only partially meet City Objective 2 is accurate and objective.

With respect to City Objective 4, which indicates the City's desired outcome that the project "[s]trengthen the community by providing public and youth-oriented space, outdoor community gathering space, and outdoor plazas," the comment correctly notes that the outdoor plaza under Alternative 2 would function as a community gathering space. However, it is the City's opinion that the Proposed Project would better meet this objective by providing additional community and publically-accessible amenities that could be used year round and in the evenings. The statement in the Draft EIR that Alternative 2 would only partially meet City Objective 4 is accurate and objective.

City Objective 7 reflects the City's desire that the Proposed Project "[c]reate employment and construction-related employment opportunities in the City of Inglewood." Contrary to the comment's assertion that Alternative 2 would generate "similar employment opportunities" as the Proposed Project, as shown in Table 2-4 on page 2-51 of the Draft EIR, and discussed further above in Response to Comment Channel-45, the arena would only employ 75 full-time employees while employment on the Project Site that would be removed under Alternative 2 include LA Clippers business operations (200), as well as restaurant, plaza uses, and hotel employees (439). Thus, Alternative 2 would provide substantially fewer employment opportunities than the Proposed Project. For this reason, the statement in the Draft EIR that Alternative 2 would only partially meet City Objective 7 is accurate and objective.

City Objective 10 indicates the City's desired outcome that the Proposed Project meets the other stated City objectives "in an expeditious and environmentally conscious manner." The analysis of Alternative 2 in the Draft EIR distinctly characterizes those aspects of the noise impacts of Alternative 2 that would be similar to, less than, and greater than those of the Proposed Project. The analysis of Alternative 2 thoroughly discusses the ways in which Alternative 2 would avoid or lessen the severity of the significant environmental impacts of the Proposed Project (see Draft EIR, pages 6-25 through 6-28). The discussion also reflects the ways in which the environmental impacts of Alternative 2 would be similar to or the same as those of the Proposed Project (see Draft EIR, pages 6-28 through 6-30), and also reflects the ways in which Alternative 2 could result in noise and transportation impacts that would be more severe than those described of the Proposed Project (see Draft EIR, page 6-30). In this latter regard, as discussed on page 6-30 on the Draft EIR, Alternative 2 would likely increase the amount of travel as LA Clipper team facilities would be located disparately throughout the region with the arena being located in Inglewood and team offices and practice facility remaining located in Downtown Los Angeles and West Los Angles, respectively. As a result, team employees would be required to drive back and forth between the arena and these existing facilities, thus resulting in more VMT than would be generated by those employees if all the facilities were co-located on the Project Site, as would occur under the Proposed Project. The recognition that an aspect of Alternative 2 could exacerbate an environmental effect is information that is intended to inform the City's consideration of the alternatives, and does not obstruct or hide the information provided about the ways that the environmental impacts of Alternative 2 would be less severe. On balance, however, Alternative 2 would, in fact lessen or avoid more impacts than would be exacerbated. As such, Draft EIR, page 6-31, first partial paragraph, the last two sentences are revised to read:

> ~~Further~~Alternative 2 would reduce the severity of a number of significant impacts of the Proposed Project, the elimination of the team practice facility, sports medical clinic, and team office means that noise propagated in the plaza area would travel further than under the Proposed Project and the LA Clippers would continue to generate VMT and associated air pollutants and GHG emissions during commute trips between these uses located around the Los Angeles basin. Notwithstanding the ways in which some impacts could be exacerbated compared to the Proposed Project~~As such~~, Alternative 2 would be ~~less~~ more responsive to City Objective 10 than the Proposed Project because it would ~~be less environmentally conscious than~~ lessen the severity of a number of significant impacts of the Proposed Project.

Applicant Objective 1e indicates the project applicant's aspiration to "create a lively, visitor- and community-serving environment year-round for patrons, employees, community members, and visitors to the surrounding neighborhood and nearby sports and entertainment venues by providing complementary on-site retail, dining, and/or community spaces." The elimination of the proposed on-site retail, dining and/or community space on the Project Site would result in Alternative 2 failing to meet this objective. Lacking the ancillary retail, restaurant, and community uses on the Project Site would mean that there would be no visitors to the Project Site on approximately 122 days of the year, which equates to about one-third of the year, and that there would be no reasons for people to arrive and congregate at the Project Site before and after events. Instead, the plaza area would be largely vacated other than immediately before and after events, and would fail to achieve the goal of creating a year-round lively environment. As a result, the conclusion in the Draft EIR that Alternative 2 would fail to achieve project applicant Objective 10 is accurate and objective.

Applicant Objective 1f seeks to "[c]ontribute to the economic and social well-being of the surrounding community by providing public benefits such as opportunities for youth- and community-oriented programs, and increasing revenues generated by property and sales taxes, admissions taxes, and potential transient occupancy taxes." This alternative would not include the proposed community space; in addition, under Alternative 2 property, sales and transient occupancy taxes would not accrue to the City due to elimination of retail, restaurant, and hotel uses in the development. For these reasons, the conclusion in the Draft EIR that Alternative 2 would be less responsive to project applicant Objective 1f is objective and accurate.

Applicant Objective 2d seeks to "[s]upport the financial viability of the Proposed Project by developing sufficient complementary on-site uses to enhance the productive use of the site on event and non-event days, including retail, dining, and potential hotel uses." The ancillary uses on the Project Site would generate revenue year round and thus would make a contribution to the financial viability of the Proposed Project. The Draft EIR does not address the question of whether Alternative 2 would be financially viable, or not. Rather, it simply reflects that the loss of revenue from operation of the ancillary uses would make Alternative 2 less financially viable than the Proposed Project.

The inclusion of a mix of uses with privately funded arenas is not unique to the Proposed Project. In recent years, most privately funded major league sports facilities are being developed in concert with a mix of other complimentary uses.[53] One notable example is Staples Center in downtown Los Angeles, where

[53] Keith Schneider, The New York Times, *Welcome to the Neighborhood: America's Sports Stadiums Are Moving Downtown*, January 29, 2018.

LA Live was developed as a ~~complement~~ complement to the arena building. Other similar recent examples in California include:

- Golden 1 Center in Sacramento, where the NBA Sacramento Kings have developed several hundred thousand square feet of retail, restaurhant, hotel, and residential uses around the arena which opened in 2016;
- Chase Center in San Francisco, where the NBA Golden State Warriors developed a $1 billion, 680,000 sf mixed use office and retail development on the same parcel as the new arena; and
- Oracle Park in San Francisco, where the Major League Baseball San Francisco Giants are in the planning stages of a $1.6 billion development that is intended to include 1,600 units and nearly one million square feet of retail and office space.

As noted in the comment, it is possible that most of the economic activity that would occur in the ancillary uses under the Proposed Project would otherwise still occur in Inglewood, particularly in the retail and related development that is occurring at the HPSP area. Nevertheless, the project applicant Objective 2d pertains to on-site uses within the Proposed Project, and in this regard Alternative 2 would fail to achieve this objective.

Finally, as noted in the comment, it is within the discretion of the City to determine whether to approve the Proposed Project. As stated in CEQA Guidelines section 15093(a), "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, or 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, or a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" Pursuant to CEQA Guidelines section 15093(b), if the City determines that the benefits of the Proposed Project outweigh the environmental impacts, it may choose to go forward with approval of the project only after adoption of a Statement of Overriding Considerations in which it "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." The opinions about the environmental impacts and the public benefits of the Proposed Project that are reflected in 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. Please also see Response to Comment NRDC-3.

Channel-48 Pursuant to CEQA Guidelines section 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 Guidelines section 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."

The Final EIR for the Proposed Project 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 CEQA Guidelines section 15088.5(a). Therefore, there is no requirement for recirculation of the Draft EIR.