

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.

From: [Lusk, Keith \(FAA\)](#)
To: [ibecproject](#)
Subject: FW: ACTION: Inglewood Basketball and Entertainment Center
Date: Friday, January 3, 2020 6:59:57 AM
Attachments: [image001.jpg](#)

See comment below regarding need to submit FAA form 7460 (airspace analysis – due to location of project and height).

1

From: Mbakoup, Edvige B (FAA) <Edvige.B.Mbakoup@faa.gov>
Sent: Thursday, January 2, 2020 9:58 AM
To: Lusk, Keith (FAA) <Keith.Lusk@faa.gov>; Adolph, Courtney (FAA) <Courtney.Adolph@faa.gov>; Armstrong, Richard (FAA) <Richard.Armstrong@faa.gov>; Edstrom, Andrew (FAA) <Andrew.Edstrom@faa.gov>; Campos, Gail (FAA) <Gail.Campos@faa.gov>; Garcia, Faviola (FAA) <Faviola.Garcia@faa.gov>; Garibaldi, Camille (FAA) <Camille.Garibaldi@faa.gov>; Green, Lierre (FAA) <Lierre.Green@faa.gov>; Healy, Elizabeth (FAA) <elizabeth.healy@faa.gov>; Hunt, Robin K (FAA) <Robin.K.Hunt@faa.gov>; Kessler, Dave (FAA) <Dave.Kessler@faa.gov>; Landis, Marina (FAA) <Marina.Landis@faa.gov>; Lofton, James (FAA) <james.lofton@faa.gov>; Manalili, Joseph (FAA) <Joseph.Manalili@faa.gov>; Matolcsy, Katherin CTR (FAA) <Katherin.CTR.Matolcsy@faa.gov>; McClardy, Mark (FAA) <Mark.McClardy@faa.gov>; McKee, Roland J (FAA) <Roland.J.McKee@faa.gov>; Moses, Augustin (FAA) <augustin.moses@faa.gov>; Nguyen, Nam P (FAA) <Nam.P.Nguyen@faa.gov>; Nishimura, Kevin H (FAA) <kevin.h.nishimura@faa.gov>; Noble, Tom (FAA) <tom.noble@faa.gov>; Perry, Edmund (FAA) <Edmund.Perry@faa.gov>; Pomeroy, Douglas (FAA) <Douglas.Pomeroy@faa.gov>; Weller, Ryan (FAA) <Ryan.Weller@faa.gov>; Wong, Gordon (FAA) <Gordon.Wong@faa.gov>; Young, Carlette (FAA) <Carlette.Young@faa.gov>
Cc: Richardson, Al (FAA) <Al.Richardson@faa.gov>; Michener, John (FAA) <John.Michener@faa.gov>
Subject: RE: ACTION: Inglewood Basketball and Entertainment Center

The only comment the LA ADO has at this time is a reminder to submit a FAA 7460 form for airspace analysis. The POCs for the LA ADO are the Acting Manager, John Michener, and the Assistant Manager, Al Richardson, who are copied on this email for your reference.

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Best regards,

Edvige B. Mbakoup

Environmental Protection Specialist
Los Angeles Airports District Office
Department of Transportation - Federal Aviation Administration
777 S. Aviation Blvd, Ste 150
El Segundo, CA 90245
(424) 405-7283

faa signature logo

From: Lusk, Keith (FAA) <Keith.Lusk@faa.gov>

Sent: Monday, December 30, 2019 12:02 PM

To: Adolph, Courtney (FAA) <Courtney.Adolph@faa.gov>; Armstrong, Richard (FAA) <Richard.Armstrong@faa.gov>; Edstrom, Andrew (FAA) <Andrew.Edstrom@faa.gov>; Campos, Gail (FAA) <Gail.Campos@faa.gov>; Garcia, Faviola (FAA) <Faviola.Garcia@faa.gov>; Garibaldi, Camille (FAA) <Camille.Garibaldi@faa.gov>; Green, Lierre (FAA) <Lierre.Green@faa.gov>; Healy, Elizabeth (FAA) <elizabeth.healy@faa.gov>; Hunt, Robin K (FAA) <Robin.K.Hunt@faa.gov>; Kessler, Dave (FAA) <Dave.Kessler@faa.gov>; Landis, Marina (FAA) <Marina.Landis@faa.gov>; Lofton, James (FAA) <james.lofton@faa.gov>; Lusk, Keith (FAA) <Keith.Lusk@faa.gov>; Manalili, Joseph (FAA) <Joseph.Manalili@faa.gov>; Matolcsy, Katherin CTR (FAA) <Katherin.CTR.Matolcsy@faa.gov>; Mbakoup, Edvige B (FAA) <Edvige.B.Mbakoup@faa.gov>; McClardy, Mark (FAA) <Mark.McClardy@faa.gov>; McKee, Roland J (FAA) <Roland.J.McKee@faa.gov>; Moses, Augustin (FAA) <augustin.moses@faa.gov>; Nguyen, Nam P (FAA) <Nam.P.Nguyen@faa.gov>; Nishimura, Kevin H (FAA) <kevin.h.nishimura@faa.gov>; Noble, Tom (FAA) <tom.noble@faa.gov>; Perry, Edmund (FAA) <Edmund.Perry@faa.gov>; Pomeroy, Douglas (FAA) <Douglas.Pomeroy@faa.gov>; Weller, Ryan (FAA) <Ryan.Weller@faa.gov>; Wong, Gordon (FAA) <Gordon.Wong@faa.gov>; Young, Carlette (FAA) <Carlette.Young@faa.gov>

Subject: ACTION: Inglewood Basketball and Entertainment Center

Regional Environmental Network:

We have received a notice on the above referenced project. If you intend to respond with comments, please notify this group (reply all) within 5 days and include your LOB POC.

If we receive responses from 2 or more LOB's, AWP-1SP will then assign a due date to consolidate comments. No response from your LOB will be treated as a negative reply.

Agency: City of Inglewood

Project: Inglewood Basketball and Entertainment Center

Project Location: Inglewood, CA see attached map

Action: NOA for Draft EIR, request for comments. See attached for more information.

Date: See attached for how to submit written comments, comments due by February 10, 2020. See attached for info on commenting.

Website: www.IBECProject.com

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From: Donahue, Darlene (FAA) <Darlene.Donahue@faa.gov>
Sent: Monday, December 30, 2019 9:02 AM
To: Lusk, Keith (FAA) <Keith.Lusk@faa.gov>
Cc: Lindsey, Dawn (FAA) <Dawn.Lindsey@faa.gov>
Subject: Correspondence EIR City of Inglewood Basketball and Entertainment Center Project

Good morning,

Please see attached correspondence we received re: EIR City of Inglewood Basketball and Entertainment Center project.

Thanks, Happy New Year

Darlene Donahue
Administrative Specialist
Western-Pacific Region - AWP-1b
424-405-7000
777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

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(cont.)

Letter FAA Response **Keith Lusk, Federal Aviation Administration (FAA)**
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 Draft 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, Draft 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.

DEPARTMENT OF TRANSPORTATION
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*Making Conservation
a California Way of Life.*

March 24, 2020

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

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

Dear Ms. Wilcox:

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

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

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

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

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

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

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

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

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

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

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

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- Eastbound (EB) I-105 on-ramp from Imperial Highway
- EB I-105 on/off-ramps from 120th Street
- Westbound (WB) I-105 off-ramp to Hawthorne Boulevard
- As a reminder, Caltrans requires the Intersection Control Evaluation (ICE) Step One screening to be conducted as per the guidelines set forth in the Caltrans ICE Process Informational Guide for Traffic Operations Policy Directive 13-02 – Please perform Intersection Control Evaluation (ICE TOPD) at the following locations:

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

↑ 10
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Regarding active transportation and transit Caltrans “supports aspects of the mitigation measures that achieve state-level policy goals related to sustainable transportation seek to reduce the number of trips made by driving, reduce Greenhouse Gas (GHG), and encourage alternative modes of travel. Caltrans’ Strategic Management Plan has set targets of tripling trips made by bicycle and double trips made by walking and public transit by 2020. The Strategic Plan also seeks to achieve a 15% reduction in statewide, per capita, vehicle miles traveled (VMT) by 2020. Similar goals are embedded in California Transportation Plan 2040, and Southern California Association of Governments’ (SCAG) Regional Transportation Plan. Statewide legislation such as AB 32 and SB 375, as well as Executive Order S-3-05 and N-19-19, echo the need to pursue more sustainable development.

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

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

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

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

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

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

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

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

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

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

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Sincerely,



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

Letter **Miya Edmonson, State of California – Department of**
Caltrans **Transportation (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 Draft 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.

¹ California Department of Transportation, *Project Initiation Report to Request Programming in the 2020 SHOPP in Los Angeles 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 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.



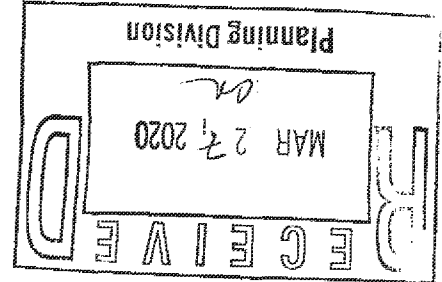
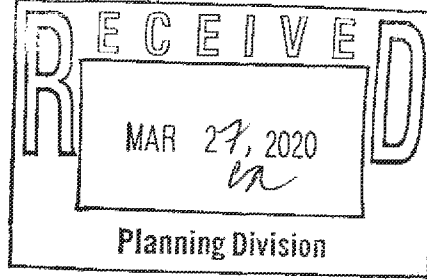
Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

March 25, 2020



Mindy Wilcox
Inglewood, City of
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

Subject: Inglewood Basketball and Entertainment Center (IBEC)
SCH#: 2018021056

Dear Mindy Wilcox:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on 3/24/2020, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

Check the CEQA database for submitted comments for use in preparing your final environmental document: <https://ceqanet.opr.ca.gov/2018021056/3>. Should you need more information or clarification of the comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

**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

From: Alina Mullins
Sent: Thursday, January 2, 2020 3:32 PM
To: ibecproject@cityofinglewood.org
Cc: Jillian Wong <jwong1@aqmd.gov>; Lijin Sun <LSun@aqmd.gov>; Celia Diamond <cdiamond@aqmd.gov>; Joyce Iledan <jiledan@aqmd.gov>
Subject: Technical Data Request: Inglewood Basketball and Entertainment Center Project

Dear Ms. Wilcox,

South Coast AQMD staff is in the process of reviewing the Draft Environmental Impact Report (Draft EIR) for the Proposed Inglewood Basketball and Entertainment Center Project (South Coast AQMD Control Number: LAC191227-10). The public commenting period is from 12/27/19 – 02/10/20.

Upon review of the files available on the Proposed Project's website as a part of the public review period, I was able to access Appendix D: Air Quality, which includes PDF versions of the CalEEMod, AERMOD, Health Risk Assessment, CMAQ and BenMAP-CE output files for the Proposed Project. Please provide an electronic copy of the live modeling files that were used to generate these output files (e.g., live input files), and any additional emission calculation spreadsheets used to quantify the air quality impacts, including health risk, from construction and/or operation of the Proposed Project.

You may burn the data onto a CD and send it to South Coast AQMD Attn: CEQA-Intergovernmental Review, to the address in my signature below. Or, you may send the above-mentioned documents via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff **no later than January 9th, 2020**. For downloading purposes, please add Ms. Celia Diamond, at cdiamond@aqmd.gov, as our contact to access the Dropbox link.

Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Thank you,

Alina Mullins
Assistant Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402
E. amullins@aqmd.gov
**Please note that South Coast AQMD is closed on Mondays.*

Letter **Alina Mullins, South Coast Air Quality Management District**
SCAQMD1 **(SCAQMD)**
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.

From: [Alina Mullins](#)
To: [ibecproject](#)
Cc: [Jillian Wong](#); [Lijin Sun](#); [Celia Diamond](#); [Joyce Iledan](#)
Subject: Follow-up Technical Data Request: Inglewood Basketball and Entertainment Center Project
Date: Wednesday, January 8, 2020 4:46:58 PM

Follow-up Technical Data Request

Good afternoon Ms. Wilcox,

I am confirming that on 01/03/2020, in response to our request from 01/02/2020, South Coast AQMD staff received a USB drive containing the following technical data: "CO Hotspot", "Construction", "D23 HIA", "GHG Files" and "Operations". South Coast AQMD staff appreciates your timely response to the original data request.

Upon review of the files sent to South Coast AQMD as a part of the original data request, we found that the file labeled "CO Hotspot" on the USB drive redirects to a shortcut, which cannot be accessed. Additionally, it did not appear that the CMAQ files, which are discussed in Chapter 3.2. Air Quality and Appendix D: Air Quality of the Draft EIR, were included on the USB drive.

Please provide an electronic copy of the live CO Hotspot and CMAQ files, and any additional emission calculation spreadsheets, that were used to quantify the air quality impacts, including the health impact analysis, from construction and/or operation of the Proposed Project.

You may burn the data onto a CD and send it to South Coast AQMD Attn: CEQA-Intergovernmental Review, to the address in my signature below. Or, you may send the above-mentioned documents via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff **as soon as possible**. For downloading purposes, please add Ms. Celia Diamond, at cdiamond@aqmd.gov, as our contact to access the Dropbox link.

Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Thank you,

Alina Mullins

Assistant Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402

E. amullins@aqmd.gov

**Please note that South Coast AQMD is closed on Mondays.*

From: Alina Mullins

Letter SCAQMD2

Sent: Thursday, January 2, 2020 3:32 PM

To: ibecproject@cityofinglewood.org

Cc: Jillian Wong <jwong1@aqmd.gov>; Lijin Sun <LSun@aqmd.gov>; Celia Diamond <cdiamond@aqmd.gov>; Joyce Iledan <Jiledan@aqmd.gov>

Subject: Technical Data Request: Inglewood Basketball and Entertainment Center Project

Dear Ms. Wilcox,

South Coast AQMD staff is in the process of reviewing the Draft Environmental Impact Report (Draft EIR) for the Proposed Inglewood Basketball and Entertainment Center Project (South Coast AQMD Control Number: LAC191227-10). The public commenting period is from 12/27/19 – 02/10/20.

Upon review of the files available on the Proposed Project's website as a part of the public review period, I was able to access Appendix D: Air Quality, which includes PDF versions of the CalEEMod, AERMOD, Health Risk Assessment, CMAQ and BenMAP-CE output files for the Proposed Project. Please provide an electronic copy of the live modeling files that were used to generate these output files (e.g., live input files), and any additional emission calculation spreadsheets used to quantify the air quality impacts, including health risk, from construction and/or operation of the Proposed Project.

You may burn the data onto a CD and send it to South Coast AQMD Attn: CEQA-Intergovernmental Review, to the address in my signature below. Or, you may send the above-mentioned documents via a Dropbox link in which they may be accessed and downloaded by South Coast AQMD staff **no later than January 9th, 2020**. For downloading purposes, please add Ms. Celia Diamond, at cdiamond@aqmd.gov, as our contact to access the Dropbox link.

Without all files and supporting documentation, South Coast AQMD staff will be unable to complete a review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.

Thank you,

Alina Mullins

Assistant Air Quality Specialist, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
P. (909) 396-2402

E. amullins@aqmd.gov

**Please note that South Coast AQMD is closed on Mondays.*

Letter **Alina Mullins, South Coast Air Quality Management District**
SCAQMD2 **(SCAQMD)**
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.

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

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

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

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

For specific revisions, additions, or deletions of wording directly from the project document the specific section, subsection, and/or item along with the page number is first referenced then the excerpt from the document is copied within quotations using the following nomenclature:

Deletions are represented by a ~~strikethrough~~.
Additions are represented by *italics* along with an underline.
Revisions are represented by a combination of the above.

1. General Comments

- A. The DEIR should disclose the following County proposed traffic enhancements in Westmont-West Athens:
 - o The Leading Pedestrian Intervals at the intersections of Century/Van Ness and Normandie/Century.
 - o Curb extensions at Century Bl/Gramercy Pl (Intersection #51) at the SE corner and NE corners. Note that although these curb extensions will not impede right-turning vehicles, please include a comment to the consultant to ensure that de-facto right turn lanes were not assumed at this intersection in their LOS calculations.



B. The DEIR should disclose the following potential County traffic enhancements in Lennox:

- The Leading Pedestrian Intervals at the intersections of Lennox/Inglewood, Lennox/Hawthorne, 111th/Hawthorne, Lennox/Freeman, 104th/Inglewood, and 104th/Hawthorne.

For questions regarding comment 1, please contact Andrew Ross of Public Works, Transportation Planning and Programs Division at (626) 300-4586 or aross@pw.lacounty.gov.

2. 3.7 Greenhouse Gas Emissions, 3.7.3 Regulatory Setting, 2017 Climate Change Scoping Plan Update, Pg. 3.7-14 to 15

The following revision should be made:

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

For questions regarding comment 2, please contact Nilda Gemeniano of Public Works, Environmental Programs Division at (626) 458-5184 or ngemenia@pw.lacounty.gov.

3. Hydrology and Water Quality, 3.9.1 Environmental Setting, Flooding, Pg. 3.9-8 to 9

The document should clarify that the "100-year flood" has a 1 percent chance of occurring in any given year and the "500-year flood" has a 0.2 percent chance of occurring in any given year.

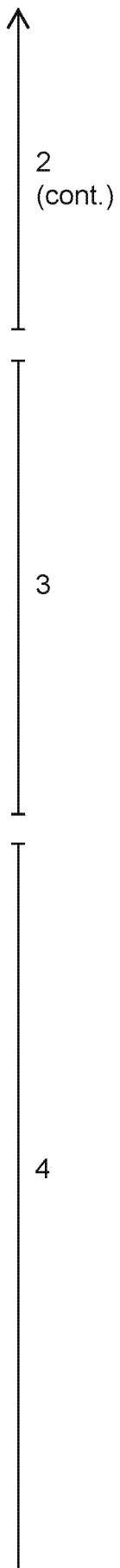
4. 3.9 Hydrology and Water Quality, 3.9.3 Regulatory Setting, Federal, Pg. 3.9-13 to 14

The document should clarify that the Code of Federal Regulations discussed is set forth by the National Flood Insurance Program's development standards for projects within floodplains.

5. 3.9 Hydrology and Water Quality, Impact and Mitigation (Impact 3.9-3), Analysis, Pg. 3.9-29 to 30

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

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



6. **3.14 Transportation and Circulation, 3.14.1 Environmental Setting, Operation, Pg. 3.14-19 to 34**

Tables 3.14-7 and 3.14-8 should note the following intersections as either shared jurisdiction with the County or entirely within the County:

- Intersection #50 - Century Blvd and Van Ness Ave
- Intersection #66 - Lennox Blvd and Freeman Ave
- Intersection #74 - Hawthorne Blvd and WB 105 off-ramp

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7. **Summary, Summary Table S-2, 3.14 Transportation and Circulation (b), Pg. S-87**

Clarify the type of pedestrian flow management that will be used. The document should note the type of proposed management, particularly in the southwest corner of the proposed project site.

For questions regarding comments 6 and 7, please contact Andrew Ross of Public Works, Transportation Planning and Programs Division at (626) 300-4586 or aross@pw.lacounty.gov.

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

The DEIR only considers LOS E or F results as “significant”, however multiple county intersections have significant impacts at LOS D, C, etc. thresholds. Please include/denote these as significant impacts as well and then address them in the mitigation section.

- Please use the attached ICU methodology for all signalized intersections and unsignalized intersections within or shared with the County.
- Address mitigations for each County impacted intersection.
- Provide an event management plan to Public Works for review.

For questions regarding comment 8, please contact Kent Tsujii of Public Works, Traffic Safety and Mobility Division at (626) 300-4776 or ktsujii@pw.lacounty.gov.

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

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

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

↑ 8
| (cont.)

10. **3.15 Utilities and Service Systems, 3.15.15 Regulatory Setting, State, Pg. 3.15-75 to 76**

The following revision should be made:

"AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 past the year 2000. ~~AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation.~~ The City of Inglewood's City-wide diversion rate per AB 939 was 62 percent in 2010."

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For questions regarding comments 9 and 10, please contact Nilda Gemeniano of Public Works, Environmental Programs Division at (626) 458-5184 or ngemenia@pw.lacounty.gov.

We request the opportunity to review the future environmental document for this project when it is available. If you have any questions or require additional information, please contact Jose Suarez of Public Works, Land Development Division, at (626) 458-4921 or jsuarez@pw.lacounty.gov.

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Signalized Intersection (ICU Methodology)

ICU Level of Service	
LOS	V/C Ratio
A	0.00 – 0.60
B	0.61 – 0.70
C	0.71 – 0.80
D	0.81 – 0.90
E	0.91 – 1.00
F	> 1.00

ICU Significant Impact		
Pre-Project LOS	V/C Ratio	Project V/C Increase
A/B	0.00 – 0.70	Causing up to 0.75
C	0.71 – 0.80	≥ 0.04 (4%)
D	0.81 – 0.90	≥ 0.02 (2%)
E/F	0.91 or more	≥ 0.01 (1%)

Unsignalized Intersection (HCM Methodology)

HCM Level of Service	
LOS	Delay (sec/veh)
A	0 to 10
B	>10 to 15
C	> 15 to 25
D	> 25 to 35
E	> 35 to 50
F	> 50

HCM Significant Impact		
Pre-Project LOS	Delay (sec/veh)	Project Significant Impact
A/B/C	0 to 25	Causing LOS D or worse
D	> 25 to 35	5.0 seconds delay increase
E/F	> 35	2.5 seconds delay increase

Source: LA County Traffic Impact Analysis Report Guidelines (May 2007)

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, 3.14-81, 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 activities⁴ 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:

<u>County of Los Angeles Department of Public Works (LACDPW)</u>	<u>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.</u>
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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 their 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, 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.

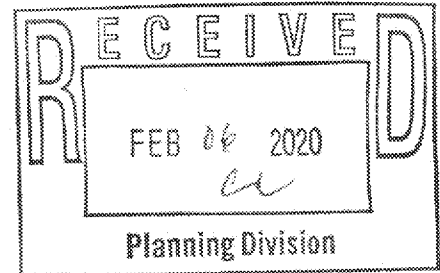
⁸ Los Angeles County Department of Public Works, *Draft Traffic Impact Analysis Report Guidelines*, December 2013.



COUNTY OF LOS ANGELES
AIRPORT LAND USE COMMISSION

January 30, 2020

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



SUBJECT: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER (IBEC)

Thank you for the opportunity to comment on the Notice of Availability of a Draft EIR for Inglewood Basketball and Entertainment Center (IBEC). Staff of the Los Angeles County Airport Land Use Commission (ALUC) has reviewed the environmental document and has the following comments.

1

In accordance with the California Public Utilities Code (PUC), Section 21676(b), prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the Airport Land Use Commission pursuant to Section 21675, the local agency shall first refer the proposed action to the ALUC for a consistency determination with the adopted Airport Land Use Compatibility Plan.

2

The types of potential airport impacts which the ALUC considers are: 1) Exposure to aircraft noise; 2) Land use safety – the risks, both to people on the ground and the occupants of aircraft, associated with aircraft accidents near airports; 3) Protection of airport airspace from hazards to flight; and 4) General concerns, especially annoyance, related to aircraft overflights. The relevant sections of the Draft EIR which the ALUC will review for this project are the Land Use & Planning, Noise and Hazards/Hazardous Materials.

The timing of submission of materials for review by the ALUC should be after the City of Inglewood has taken preliminary action, such as through Planning Commission's initial approval, but before the City Council has considered the project for final approval. All project information should be filed with the Los Angeles County Department of Regional Planning.

A pre-consultation with ALUC staff is recommended before the formal submission of project materials, which can be arranged by calling (213) 974-6432 or sending an email to aluc@planning.lacounty.gov. For additional information on project submittal materials, please visit our webpage at: <http://planning.lacounty.gov/aluc>.

3

If you have any questions, please call Alyson Stewart at (213) 458-5513 or Bruce Durbin

at (213) 974-6432 Monday through Thursday between 7:30 a.m. and 5:30 p.m, or email them at aluc@planning.lacounty.gov.

Sincerely,



Bruce Durbin, Supervising Regional Planner
Ordinance Studies/ALUC Staff

BD:as

**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.

From: Timothy McCormick
To: ibecproject
Subject: El R comments from Big Blue Bus, City of Santa Monica
Date: Thursday, February 6, 2020 2:05:57 PM

Minimization of environmental impacts of this facility will hinge on the ability of the facility to attract passengers to use bus and rail connections. The attractiveness of those connections will be in large part affected by the ability of buses to travel between the stations and the facility unhindered by traffic. This project adds to the significant development happening along Prairie Avenue and increases the urgency of providing a bus rapid transit lane along Prairie Avenue, so that people can be tempted out of their cars, and onto the regional bus and rail network.

1
2

Tim McCormick
Manager of Planning and Performance
Big Blue Bus
310.458.1975, ext 5831

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 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.



COUNTY OF LOS ANGELES FIRE DEPARTMENT

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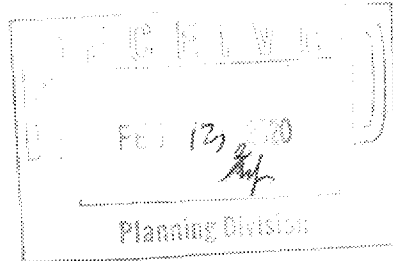
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JANICE HAHN FOURTH DISTRICT

KATHRYN BARGER FIFTH DISTRICT

February 7, 2020



Mindy Wilcox, Planning Manager City of Inglewood Planning Division One West Manchester Boulevard Inglewood, CA 90301

Dear Ms. Wilcox:

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER," WOULD CONSIST OF AN APPROXIMATELY 915,000-SQUARE FOOT ARENA STRUCTURE DESIGNED TO HOST THE LA CLIPPERS BASKETBALL TEAM WITH UP TO 18,000 FIXED SEATS FOR NATIONAL BASKETBALL ASSOCIATION GAMES, THE ARENA COULD ALSO BE CONFIGURED WITH UP TO 500 ADDITIONAL TEMPORARY SEATS FOR EVENTS SUCH AS FAMILY SHOWS, CONCERTS, CONVENTIONS AND CORPORATE EVENTS, AND NON-LA CLIPPER SPORTING EVENTS, LOCATED AT 3812 WEST 102ND STREET, INGLEWOOD, FFER 2020000026

The Notice of Availability of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department.

The following are their comments:

PLANNING DIVISION:

3.13.4 Analysis, Impacts and Mitigation, Impacts and Mitigation Measures, Operations, paragraph 4, sentence 3, the statement "cumulative projects would generate revenue (e.g., developer fees, property and sales tax revenue) that could be used to offset LACFD expenditures", is incorrect, these revenues are not collected by LACFD and therefore would not offset any cost incurred by LACFD to provide additional staffing. The funding for the cost of the additional captain post position would have to be provided by the Developer.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

- AGOURA HILLS, ARTESIA, AZUSA, BALDWIN PARK, BELL, BELL GARDENS, BELFLOWER, BRADBURY, CALABASAS, CARSON, CERRITOS, CLAREMONT, COMMERCE, COVINA, CUDAHY, DIAMOND BAR, DUARTE, EL MONTE, GARDENA, GLENDORA, HAWAIIAN GARDENS, HAWTHORNE, HERMOSA BEACH, HIDDEN HILLS, HUNTINGTON PARK, INDUSTRY, INGLEWOOD, IRWINDALE, LA CANADA-FLINTRIDGE, LA HABRA, LA MIRADA, LA PUENTE, LAKEWOOD, LANCASTER, LAWDALE, LOMITA, LYNWOOD, MALIBU, MAYWOOD, NORWALK, PALMDALE, PALOS VERDES ESTATES, PARAMOUNT, PICO RIVERA, POMONA, RANCHO PALOS VERDES, ROLLING HILLS, ROLLING HILLS ESTATES, ROSEMEAD, SAN DIMAS, SANTA CLARITA, SIGNAL HILL, SOUTH EL MONTE, SOUTH GATE, TEMPLE CITY, WALNUT, WEST HOLLYWOOD, WESTLAKE VILLAGE, WHITTIER

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For any questions regarding this response, please contact Loretta Bagwell, Planning Analyst, at (323) 881-2404 or Loretta.Bagwell@fire.lacounty.gov.

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| (cont.)

LAND DEVELOPMENT UNIT:

1. The County of Los Angeles Fire Department Land Development Unit's comments are general requirements. Specific fire and life safety requirements and conditions set during the environmental review process will be addressed and conditions set at the building and fire plan check phase. Once the official plans are submitted for review there may be additional requirements.
2. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows, and fire hydrants.
3. Where Fire Apparatus Access roads or a water supply for fire protection are required to be installed, such protection shall be installed and made serviceable prior to and during the time of construction except when approved alternative methods of protection are provided. Temporary street signs shall be installed at each street intersection where construction of new roadways allows passage by vehicles in accordance with section 205.2.
4. Approved Fire Apparatus Access Roads shall be provided for every facility, building, or portion of a building hereafter constructed or moved into or within the jurisdiction. The Fire Apparatus Access Road shall comply with the requirement of this section and shall extend to within 150 feet (45 720 mm) of all portions of the facility and all portions of the exterior walls of the first story of the buildings as measured by an approved route around the exterior of the building or facility.
5. Fire Apparatus Access Roads shall be installed and arranged in accordance with Sections 503.2.1 through 503.2.8 [California Code of Regulations, Title 19, Division 1, §3.05(a)] Fire Department Access and Egress. (Roads) (a)Roads. Required access roads from every building to a public street shall be all-weather hard-surfaced (suitable for use by fire apparatus) right-of-way not less than 20 feet in width. Such right-of-way shall be unobstructed and maintained only as access to the public street.
6. The dimensions of approved fire apparatus roads shall be maintained as originally approved by the fire code official.
7. Disruptions to water service shall be coordinated with the County of Los Angeles Fire Department and alternate water sources shall be provided for fire protection during such disruptions.
8. Fire Apparatus Access Roads shall be designed and maintained to support the imposed loads of fire apparatus and shall be surfaced so as to provide all weather driving capabilities.

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9. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
10. Dead end Fire Apparatus Access Roads in excess of 150 feet (47 750 mm) in-length shall be provided with an approved area for turning around fire apparatus.
11. The area of firefighting operations shall not be located underneath high-voltage transmission lines.
12. Where required by the fire code official approved signs, other approved notices, or markings that include the words NO PARKING-FIRE LANE shall be provided for Fire Apparatus Access Roads to identify such roads, to clearly indicate the entrance to such road or prohibit the obstruction thereof. The means by which fire lanes are designated shall be maintained in a clean and legible condition at all times and be replaced or repaired when necessary to provide adequate visibility. A non-parking designation shall meet the requirements of California Vehicle Code Section 22500.1 and be approved by the fire code official.
13. Fire Apparatus Access Roads shall not be obstructed in any manner, including by the parking of vehicles or the use of traffic calming devices, including but not limited to, speed bumps or speed humps. The minimum widths and clearances established in Sections 503.2.1 and 503.2.2 shall be maintained at all times.
14. Traffic calming devices, including but not limited to, speed bumps and speed humps, shall be prohibited unless approved by the fire code official.
15. The fire code official is authorized to require the installation and maintenance of gates, or other approved barricades across Fire Apparatus Access Roads, trails or other access ways, not including public streets, alleys or highways. Electric gate operators, where provided, shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.
16. The installation of security gates across a Fire Apparatus Access Road shall be approved by the fire chief. Where security gates are installed they shall have an approved means of emergency operation. The security gates and the emergency operation shall be maintained operational at all times. Electric gate operators, where provided, shall be listed in accordance with UL 325. Gates intended for automatic operation shall be designed. Constructed and installed to comply with the requirements of ASTM F2200.
17. Exterior doors and openings required by this code or the California Building Code shall be maintained readily accessible for emergency access by the fire department. An approved access walkway leading from Fire Apparatus Access Roads to exterior openings shall be provided when required by the fire code official. [California Code of



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Regulations, Title 19, Division 1, §3.05(b)] Fire Department Access and Egress (Roofs) (b) Roofs. No person shall install or maintain any security barrier such as barbed wire fencing, razor wire fencing, chain link fencing, or any other fencing material cable aerial, antenna, or other obstruction on the roof of any commercial establishment in such a manner as to obstruct or render egress or access hazardous in the event of fire or other emergency.

18. New buildings four or more stories above grade plane, except those with a roof slope greater than four units vertical in 12 units horizontal shall be provided with a stairway to the roof. Stairway access to the roof shall be in accordance with Section 1011.12. Such stairway shall be marked at street and floor levels with a sign indicating that the stairway continues to the roof. Where roofs are used for roof gardens or for other purposes, stairways shall be provided as required for such occupancy classification.
19. No person shall install any security barrier, visual barrier screen, or other obstruction on the roof of any building in such a manner as to obstruct firefighter ingress or egress in the event of fire or other emergency. Parapets shall not exceed 48 inches on at least two sides of the building.
20. New and existing buildings shall be provided with approved address identification. The address identification shall be legible and placed in a position that is visible from the street or road fronting the property. Address identification characters shall contrast with their background. Address numbers shall be Arabic numbers or alphabetical letters. Numbers shall not be spelled out. Each character shall be not less than 4 inches high with a minimum stroke width of 1/2 inch. Where required by the fire code official, address identification shall be provided in additional approved locations to facilitate emergency response. Where access is by means of a private road and the building cannot be viewed from the public way, a monument pole or other sign or means shall be used to identify the structure. Address identification shall be maintained.
21. Streets and roads shall be identified with approved signs. Temporary signs shall be installed at each street intersection when construction of new roadways allows passage by vehicles. Signs shall be of an approved size, weather resistant, and be maintained until replaced by permanent signs.
22. Multiple residential and commercial units having entrance doors not visible from the street or road shall have, in addition to the requirements of Section 505.1 above, approved numbers grouped for all units within each structure and positioned to be plainly visible from the street or road. Said numbers may be grouped on the wall of the structure or on a mounting post independent of the structure.
23. Where access to or within a structure or an area is restricted because of secured openings or where immediate access is necessary for life saving or firefighting purposes, the fire code official is authorized to require a key box to be installed in an approved location. The key box shall be of an approved type listed in accordance with



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- UL 1037, and shall contain keys to gain necessary access as required by the fire code official.
24. An approved lock shall be installed on gates or similar barriers where required by the fire code official.
 25. Key boxes provided for no standardized fire service elevator keys shall comply with Section 506.1 and all of the following:
 - a. The key box shall be compatible with an existing rapid entry key box system in use in the jurisdiction and approved by the fire code official.
 - b. The front cover shall be permanently labeled with the words "Fire Department Use Only-Elevator Keys"
 - c. The key box shall be mounted at each elevator bank at the lobby nearest to the lowest level of fire department access.
 - d. The key box shall be mounted 5 feet 6 inches above the finished floor to the right side of the elevator bank.
 - e. Contents of the key box are limited to fire service elevator keys. Additional elevator access tools, keys, and information pertinent to emergency planning or elevator access shall be permitted where authorized by the fire code official.
 - f. In buildings with two or more elevator banks a single key box shall be permitted to be used where such elevator banks are separated by not more than 30 feet. Additional key boxes shall be provided for each individual elevator or elevator bank separated by more than 30 feet.
 26. An approved water supply capable of supplying the required fire flow for fire protection shall be provided to premises upon which facilities, buildings, or portions of buildings are hereafter constructed or moved into or within the jurisdiction.
 27. Fire flow requirements for buildings or portions of buildings and facilities shall be determined by an approved method or Appendix B, County of Los Angeles Fire Code.
 28. Fire hydrant systems shall comply with Sections 507.5.1 through 507.5.6 and Appendix C or by an approved method.
 29. Where a portion of the facility or building hereafter constructed or moved into or within the jurisdiction is more than 400 feet (122 m) from a hydrant on a Fire Apparatus Access Road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains shall be provided where required by the fire code official.



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30. Unobstructed access to fire hydrants shall be maintained at all times. The fire department shall not be deterred or hindered from gaining immediate access to fire protection equipment or fire hydrants.
31. When required by the fire code official, a fire hydrant, and other firefighting water source shall be identified by the installation of a blue raised reflective pavement marker or identified by other approved means. The minimum fire-flow and flow duration for buildings other than one- and two-family dwellings, and Group R-3 buildings shall be as specified in Tables B105.2 and B105.1(2).
32. The minimum number of fire hydrants available to a building, complex or subdivision shall not be less than that determined by the spacing requirements in Section C105 and Section C106 when applied to Fire Apparatus Access Roads and perimeter public streets from which fire operations could be conducted.
33. For all occupancies other than one- and two-family dwellings, and Group R-3 buildings, including commercial, industrial, multi-family dwellings, private schools, and institutions, fire hydrant spacing shall be 300 feet (91.44 m). No portion of lot frontage shall be more than 200 feet (60.96 m) from, via vehicular access, a public hydrant. No portion of a building shall be more than 400 feet (121.92 m) from, via vehicular access, a properly spaced public hydrant.
34. Facilities, buildings, or portions of buildings hereafter constructed shall be accessible to fire department apparatus by way of an approved Fire Apparatus Access Road with an asphalt, concrete, or other approved driving surface capable of supporting the imposed load of fire apparatus weighing at least 75,000 pounds (34 050 kg).
35. Dead-end Fire Apparatus Access Roads in excess of 150 feet (45,720 mm) shall be provided with an approved turnaround. See Figure D103.6(1) and (2). The turnaround shall be oriented on the access roadway in the proper direction of travel.
36. Gates securing the Fire Apparatus Access Roads shall comply with all the following criteria:
 - a. Where a single-gate is provided, the gate width shall be not less than 20 feet (6096 mm). Where a fire apparatus road consists of a divided roadway, the gate width shall be not less than 15 feet (4572 mm) for residential use and 20 feet (6096 mm) for commercial/industrial uses.
 - b. Gates shall be of the swinging or sliding type.
 - c. Construction of gates shall be of materials that allow manual operation by one person.
 - d. Gate components shall be maintained in an operative condition at all times and replaced or repaired when defective.



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- e. Electric gates shall be equipped with a means of opening the gate by Fire Department personnel for emergency access. Emergency opening devices shall be approved by the fire code official.
 - f. Methods of locking shall be submitted for approval by the fire code official.
 - g. Electric gate operators, where provided, shall be listed in accordance with UL 325.
 - h. Gates intended for automatic operation shall be designed, constructed, and installed to comply with the requirements of ASTM F2200.
37. Where required by the fire code official, Fire Apparatus Access Roads shall be marked with permanent "NO PARKING - FIRE LANE" signs complying with Section 22500.1 of the California Vehicle Code. Signs shall have a minimum dimension of 12 inches (305 mm) wide by 18 inches (457 mm) high and have red letters on a white reflective background. Signs shall be posted on one or both sides of the fire apparatus road as required.
38. Where the vertical distance between the access roadway and the highest roof surface exceeds 30 feet (9144 mm), approved aerial fire apparatus access roads shall be provided. For purposes of this section, the highest roof surface shall be determined by measurement to the eave of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater.
39. Aerial Fire Apparatus Access Roads shall have a minimum unobstructed width of 28 feet (8535 mm), exclusive of shoulders, in the immediate vicinity of the building or portion thereof.
40. At least one of the required access routes meeting this condition shall be located within a minimum of 15 feet (4572 mm) and a maximum of 30 feet (9144 mm) from the building, and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial Fire Apparatus Access Road is positioned shall be approved by the fire code official.
41. Overhead utility and power lines shall not be located over the aerial Fire Apparatus Access Road or between the aerial fire apparatus road and the building. Other obstructions shall be permitted to be placed with the approval of the fire code official.

The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project.

Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department - Land Development Unit, Inspector Nancy Rodeheffer at (323) 890-4243.



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FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

The statutory responsibilities of the County of Los Angeles Fire Department's Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed.

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Under the Los Angeles County Oak tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus which is 25 inches or more in circumference (eight inches in diameter), as measured 4 1/2 feet above mean natural grade.

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If Oak trees are known to exist in the proposed project area further field studies should be conducted to determine the presence of this species on the project site. The County of Los Angeles Fire Department's Forestry Division has no further comments regarding this project.

For any questions regarding this response, please contact Forestry Assistant, Joseph Brunet at (818) 890-5719.

HEALTH HAZARDOUS MATERIALS DIVISION:

The Site Mitigation Unit (SMU) is within the Health Hazardous Materials Division of the Los Angeles County Fire Department. SMU does not direct nor issue permits for environmental cleanups; SMU oversees environmental cleanups for the protection of the environment and manages associated potential human health risks and hazards. If SMU were to oversee environmental site assessment, remediation, and mitigation measures at the project site, the applicant would have to enter into a "Remedial Action Agreement" with SMU per California Health and Safety Code (HSC) Section 101480(c). However, SMU is currently understaffed and is not able to oversee the project at this time due to previous commitments. Therefore, the Cal-EPA Department of Toxic Substances Control or the Los Angeles Regional Water Quality Control will have to be pursued for environmental oversight of the project site.

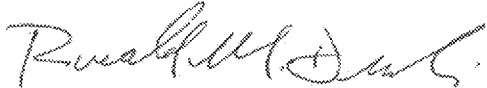
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Please contact HHMD senior typist-clerk, Perla Garcia at (323) 890-4035 or Perla.garcia@fire.lacounty.gov if you have any questions.

If you have any additional questions, please contact this office at (323) 890-4330.

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Very truly yours,

A handwritten signature in black ink, appearing to read "Ronald M. Durbin". The signature is written in a cursive style with a large initial "R".

RONALD M. DURBIN, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

RMD:ac

**Letter
LACFD
Response**

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

- 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 were 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. needs 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, Section 3.9, 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.

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

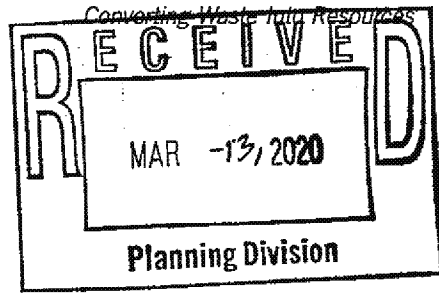
Prior to initiating any ground disturbing activities on the Project Site, the project applicant shall prepare a Soil Management Plan (SMP) that is submitted to and reviewed and approved by the Los Angeles County Health Hazardous Materials Division (HHMD), California Department of Toxic Substances Control (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 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 ~~HHMP~~ the 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.

SANITATION DISTRICTS OF LOS ANGELES COUNTY



Robert C. Ferrante

Chief Engineer and General Manager

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
(562) 699-7411 • www.lacsd.org

March 10, 2020

Ref. DOC 5495448

Ms. Mindy Wilcox, AICP
City of Inglewood
One West Manchester Boulevard
4th Floor
Inglewood, CA 90301

Dear Ms. Wilcox:

DEIR Response for the Inglewood Basketball and Entertainment Center

The Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report (DEIR) for the subject project on December 27, 2019. The proposed project is located within the jurisdictional boundary of District No. 5. Previous comments submitted by the Districts in correspondence dated March 27, 2018 (copy enclosed) still apply to the subject project with the following comments:

1. **Wastewater Conveyance and Treatment, page S-36**, second paragraph – The Proposed Project would contribute sewage flows to the Districts’ Prairie Avenue Trunk Sewer and the South Inglewood-Orange Avenue Trunk Sewer. 1
2. **Table 3.15-13, page 3.15-50**, Estimated Existing Wastewater Generation at the Project Site – Based on the District’s records, the existing wastewater generation at the project site is 8,955 gallons per day. 2
3. **Table 3.15-14, page 3.15-52**, Estimated Hollywood Park Specific Plan Wastewater Generation – Based on the Districts’ average wastewater generation factors, the expected increase in average wastewater flow from the Hollywood Park Specific Plan, as specified in the table, is 1,070,559 gallons per day. For a copy of the Districts’ average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the **Table 1. Loadings for Each Class of Land Use** link. 3
4. **Table 3.15-14, page 3.15-52**, Estimated Hollywood Park Specific Plan Wastewater Generation – Based on the Districts’ average wastewater generation factors, the expected increase in average wastewater flow from the Hollywood Park Specific Plan, as specified in the table, is 1,070,559 gallons per day. For a copy of the Districts’ average wastewater generation factors, go to www.lacsd.org, under Services, then Wastewater Program and Permits, select Will Serve Program, and scroll down to click on the **Table 1. Loadings for Each Class of Land Use** link. 4
5. **Table 3.15-15, page 3.15-56**, Estimated Proposed Project Wastewater Generation and Sewer Capacity Summary – Based on the Districts’ average wastewater generation factors, the expected increase in average wastewater flow from the project site, as described in Table 3.15-15 is 276,794 gallons per day, after the structures on the project site are demolished. 5
6. **Operation, page 3.15-57**, first paragraph – Point of connection 3 proposes to connect directly to the Districts’ Prairie Trunk Sewer, located in Freeman Avenue at 103rd Street. A 6-inch diameter or smaller direct connection to a Districts’ trunk sewer requires a Trunk Sewer Connection Permit, 6

Letter Sanitation

Ms. Mindy Wilcox

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March 10, 2020

issued by the Districts. An 8-inch diameter or larger direct connection to a Districts' trunk sewer requires submittal of Sewer Plans for review and approval by the Districts.

↑ 6
| (cont.)

6. **Table 3.15-16, page 3.15-60, Estimated Cumulative Wastewater Generation** – The Districts should review individual developments within the City in order to determine whether or not sufficient trunk sewer capacity exists to serve each project and if Districts' facilities will be affected by the project.

| 7

All other information concerning Districts' facilities and sewerage service contained in the document is current. If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

| 8

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

Enclosure

cc: A. Schmidt
A. Howard



COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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GRACE ROBINSON HYDE
Chief Engineer and General Manager

March 27, 2018

Ref. Doc. No.: 4473293

Ms. Mindy Wilcox, AICP
City of Inglewood
One West Manchester Boulevard
4th Floor
Inglewood, CA 90301

Dear Ms. Wilcox:

**NOP Comment Letter for
the Inglewood Basketball and Entertainment Center**

The Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on February 26, 2018. The proposed project is located within the jurisdictional boundaries of District No. 5. We offer the following comments regarding sewerage service:

1. Availability of sewer capacity depends upon project size and timing of connection to the sewerage system. Because there are other proposed developments in the area, the availability of trunk sewer capacity should be verified as the project advances. Please submit a copy of the project's build-out schedule to the undersigned to ensure the project is considered when planning future sewerage system relief and replacement projects.
2. The following is a list of Districts' trunk sewers that serve the project area:

Name	Location	Size (dia.)*	Capacity (mgd)**	Peak Flow (mgd)	Last Measured
South Inglewood-Orange Avenue Trunk Sewer	In Doty Avenue at 102 nd Street.	15	2.6	0.8	2011
Prairie Avenue Trunk Sewer	In the westbound Prairie Avenue exit of Interstate 105.	31.5	12.4	4.2	2011
Prairie Avenue Trunk Sewer	In Freeman Avenue at 103 rd Street	30	10.9	3.7	2011

*diameter in inches
**million gallons per day

3. The wastewater generated by the proposed project will be treated at the Joint Water Pollution Control Plant located in the City of Carson, which has a capacity of 400 mgd and currently produces an average flow of 256 mgd.
4. The expected average wastewater flow from the project, described in the notice as an 18,000 fixed seat arena, an approximately 85,000 square foot athletic training facility, approximately

Ms. Mindy Wilcox

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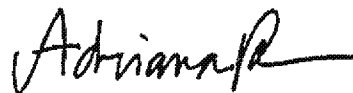
March 27, 2018

55,000 square feet of office space, an approximately 25,000 square foot medical clinic, and approximately 40,000 square feet of retail and other ancillary uses, is 241,250 gallons per day. For a copy of the Districts' average wastewater generation factors, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and click on the Table 1, Loadings for Each Class of Land Use link.

5. The Districts are empowered by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System for increasing the strength or quantity of wastewater discharged from connected facilities. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For more information and a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Wastewater & Sewer Systems, click on Will Serve Program, and search for the appropriate link. In determining the impact to the Sewerage System and applicable connection fees, the Districts' Chief Engineer and General Manager will determine the user category (e.g. Condominium, Single Family home, etc.) that best represents the actual or anticipated use of the parcel or facilities on the parcel. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at (562) 908-4288, extension 2727.
6. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CCA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,



Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

cc: A. Schmidt
M. Tatalovich

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. 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

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 ~~2.382.67~~ 332.67 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	400325 gallons/1,000 sf	51,808,168,375	0.43 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
	Mixed Use Building	24,000 sf	325,400 gallons/1,000 sf	2,400 <u>7,800</u>	0.02	0.04 <u>0.03</u>	8	0.77	0.10	0.07	Yes
	<i>Subtotal</i>	<i>48,000</i>		26,400 <u>31,800</u>	0.07 <u>0.08</u>	0.10 <u>0.12</u>			0.01	0.01	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
	<i>Subtotal</i>	<i>3,700</i>		<i>37,000</i>	<i>0.09</i>	<i>0.14</i>		<i>0.54</i>	<i>0.14</i>		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					
<i>Subtotal</i>				187,700 <u>198,200</u>	<i>0.50</i>	<i>0.77</i>		<i>0.83</i>	<i>0.83</i>		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	
	<i>Subtotal</i>			<i>18,750</i>	<i>0.05</i>	<i>0.07</i>		<i>0.77</i>	<i>0.07</i>		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 does 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.

SENT VIA E-MAIL AND USPS:

March 10, 2020

ibecproject@cityofinglewood.org

mwilcox@cityofinglewood.org

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

**Draft Environmental Impact Report (Draft EIR) for the Proposed
Inglewood Basketball and Entertainment Center Project (SCH No.: 2018021056)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments include recommended revisions to the air quality analysis, health risk assessment, and mitigation measures that the Lead Agency should include in the Final EIR.

Based on the Draft EIR, the Lead Agency proposes to demolish 54,098 square feet of existing buildings and develop a 915,000-square-foot basketball and entertainment center with 18,000 fixed seats, 500 temporary seats, and 461,800 square feet of ancillary structures on 27.7 acres (Proposed Project). The Proposed Project is located on the southeast corner of South Prairie Avenue and West Century Boulevard within the City of Inglewood. Construction of the Proposed Project will occur over a four-year period from 2021-2024¹. It is anticipated that operations will begin in 2024².

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has five main comments on the Draft EIR and supporting air quality and health risk assessment analyses. A summary of these comments is provided as follows with additional details provided in the attachments.

1. Air Quality Impacts from Backfilled Events at the Existing Entertainment Center: When the Proposed Project is operational, basketball events that are taking place at the existing entertainment center in the City of Los Angeles would be relocated to the Proposed Project in the City of Inglewood. Relocation of basketball events to the Proposed Project will likely allow additional events to take place at the existing entertainment center. The Lead Agency considered these events as backfilled events. The Draft EIR quantified greenhouse gas (GHG) emissions from those events that will occur at the existing entertainment center as an indirect environmental impact induced by operation of the Proposed Project. The Final EIR should analyze the air quality impacts from this indirect environmental impact, similar to how the Draft EIR analyzed GHG emissions from backfilled events.

¹ Draft EIR. Chapter 3.2 Air Quality. Page 3.2-38.

² *Ibid.* Page 3.2-41.

2. Air Quality Impacts from Cleanup Activities: In the Draft EIR, the Lead Agency discussed a need to conduct cleanup activities at the Proposed Project site due to the detection of hexavalent chromium, chlordane, chrome, lead, and total petroleum hydrocarbons (TPH)³. The Lead Agency should quantify emissions from cleanup activities in the Final EIR. 3

3. Health Risk Assessment (HRA): Based on the exposure durations used to estimate the health risks, the Proposed Project’s operational health risk impacts are underestimated because the Lead Agency used a shorter exposure duration than is recommended. Because the closest sensitive receptors are located within 50 feet of the Proposed Project⁴, South Coast AQMD staff is concerned about health risk impacts on nearby receptors. Therefore, the Lead Agency should revise the health risk assessment in the Final EIR and use a 30-year exposure period for sensitive receptors and a 25-year exposure period for off-site workers. 4

4. Recommended Revisions to Existing Air Quality Project Design Features and Mitigation Measures: The Lead Agency will require the use of electric powered or alternative-fueled, and at a minimum, Tier 4 construction equipment. For on-road vehicles, the Lead Agency will strive to use zero-emissions (ZE) or near-zero emissions (NZE) heavy-duty trucks. Since NZE heavy-duty truck engines are already commercially available, and to further reduce the Proposed Project’s significant construction and operational NOx emissions, the Lead Agency should require more electric construction equipment and use ZE heavy-duty trucks in the Final EIR. 5

5. South Coast AQMD Rules: In the Draft EIR, the Lead Agency discussed South Coast AQMD Rule 1401, Rule 1402, Rule 1403, and Rule 1470⁵. Since hexavalent chromium has been detected at the Proposed Project site, the Lead Agency should include a discussion in the Final EIR on South Coast AQMD Rule 1466 requirements to reduce fugitive dust emissions during earth-moving activities, including, but not limited to, conducting earth-moving activities in an area with fencing that is a minimum six feet tall and at least as tall as the height of the tallest stockpile, with a windscreen with a porosity of 50 ± 5%⁶. Rule 1466 also includes monitoring, notification, signage, and recordkeeping requirements that should be included in the soil management plan for Proposed Project. The Lead Agency should also include a discussion in the Final EIR on South Coast AQMD Rule 1166⁷ since presence of TPH has been detected at the Proposed Project site. 6

In conclusion, the Draft EIR likely underestimated the Proposed Project’s emissions from cleanup activities and operational cancer risk, and did not discuss South Coast AQMD Rule 1466 and Rule 1166. The South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis and health risk assessment in the Final EIR. 7

³ *Ibid.* Chapter 3.8. Hazards and Hazardous Materials. Page 3.8-42.

⁴ *Ibid.* Figure 3.2-2: Air-Sensitive Receptors. Page 3.2-20.

⁵ *Ibid.* Chapter 3.2. Air Quality. Page 3.2-31.

⁶ South Coast AQMD. Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

⁷ South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1166.pdf>.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter and on the Assembly Bill 987 analysis, which will be prepared separately from the EIR. Please feel free to call me at (909) 396-3308 if you have questions or wish to discuss the comments.

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Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachments
SN:JW:LS/AM
LAC191227-10
Control Number

ATTACHMENT A

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment

The Lead Agency quantified the Proposed Project's regional construction and operational emissions and compared those emissions to South Coast AQMD's regional CEQA air quality significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's mitigated construction NOx emissions would be significant at 127 pounds/day (lbs/day) and mitigated operational emissions for NOx, CO, PM10, and PM2.5 would also be significant at 99 lbs/day, 904 lbs/day, 328 lbs/day, and 89 lbs/day, respectively⁸. The Lead Agency performed air dispersion modeling to analyze the Proposed Project's localized construction and operational air quality impacts for NOx, CO, PM10, and PM2.5 and found that concentrations would not exceed the most stringent air quality standards⁹. The Lead Agency also conducted a HRA for the Proposed Project's construction and operational activities and found that the Proposed Project would result in an incremental increase of 9.7 in one million¹⁰, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹¹.

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South Coast AQMD staff's detailed comments on the Draft EIR's air quality analysis and health risk assessment are provided as follows.

1. Air Quality Impacts from Backfilled Events at the Existing Entertainment Center

Once the Proposed Project is operational, basketball events that are taking place at the existing entertainment center in the City of Los Angeles would be relocated to the Proposed Project in the City of Inglewood. This relocation of basketball events to the Proposed Project will likely provide capacity at the existing entertainment center that can have or be filled with events that are not otherwise taking place there now. The Lead Agency considered these events as backfilled events.

In the Greenhouse Gas Emissions Chapter of the Draft EIR, the Lead Agency quantified the Proposed Project's greenhouse gas (GHG) emissions from backfilled events as an indirect environmental impact induced by operation of the Proposed Project. However, the Lead Agency did not evaluate the indirect air quality impacts from backfilled events in the Draft EIR. To be consistent with the GHG emissions analysis, to provide a more comprehensive analysis of the Proposed Project's operational air quality impacts, and to be consistent with CEQA's requirements for analyzing a project's direct and reasonably foreseeable indirect environmental impacts (CEQA Guidelines Section 15064(d)), South Coast AQMD staff recommends that the Lead Agency quantify the criteria pollutant emissions from backfilled events and include those emissions in the Proposed Project's operational emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for operation to determine the level of significance in the Final EIR. If the air quality impacts from backfilled events are not included in the Final EIR, the Lead Agency should provide reasons

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⁸ Draft EIR. Chapter 3.2 Air Quality. Pages 3.2-74 and 80.

⁹ *Ibid.* Pages 3.2-91 through 3.2-94.

¹⁰ *Ibid.*

¹¹ South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

for the inconsistency between the GHG and air quality analyses supported by substantial evidence in the record.

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2. Air Quality Impacts from Cleanup Activities

In the Hazards and Hazardous Materials Chapter of the Draft EIR, the Lead Agency stated that due to detection of hexavalent chromium, chlordane, chrome, lead, and total petroleum hydrocarbons, a soil management plan will be prepared prior to the commencement of any ground disturbing activities¹². The soil management plan may include cleanup activities to excavate, transport, and dispose contaminated soil and materials off-site. If suspected contaminated soil and materials are encountered during site preparation or construction activities, construction work will stop in the contaminated areas until remediation is completed and a “no further action” letter is obtained¹³.

Workers and Equipment for Cleanup Activities

While the Draft EIR quantified the Proposed Project’s emissions from demolition and construction activities in support of the proposed entertainment center and ancillary uses, it did not quantify emissions from cleanup activities, which may take place concurrently with development of the proposed entertainment center and ancillary uses. Cleanup activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Since cleanup activities are reasonably foreseeable at the time the Draft EIR was prepared, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities, and include those emissions in the Proposed Project’s construction emissions profile to be compared to South Coast AQMD’s air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. Alternatively, if emissions from cleanup activities are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record.

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3. Health Risk Assessment (HRA)

In the Air Quality Section of the Draft EIR, the Lead Agency conducted a construction HRA and an operational HRA¹⁴. The Lead Agency found that the Proposed Project’s combined construction and operational incremental cancer risk would be 9.7 in one million¹⁵, which would not exceed South Coast AQMD’s CEQA significance threshold of 10 in one million for cancer risk. However, upon review of the “CSTN + Operations HRA” in Appendix D, South Coast AQMD staff found that the Lead Agency calculated cancer risk to residential receptors, workers, and children at school and daycare facilities based on a 26.98-year, 21.73-year, and 3.73-year exposure duration, respectively¹⁶.

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¹² Draft EIR. Chapter 3.8 Hazards and Hazardous Materials. Pages 3.8-40 through 3.8-43.

¹³ *Ibid.* Page 3.8-43.

¹⁴ *Ibid.* Pages 3.2-97 through 3.2-102.

¹⁵ *Ibid.*

¹⁶ *Ibid.* Appendix D. CSTN + Operations HRA “Residential Exposure Factors”. PDF pages 6057, 7541, and 7937.

The Proposed Project’s operational health risk impacts may be underestimated because the Lead Agency used a shorter exposure duration for sensitive receptors and off-site workers. Additionally, the South Coast AQMD’s CEQA significance threshold of 10 in a million for cancer risk is based on a 30-year exposure duration for sensitive receptors and a 25-year exposure duration for off-site workers. Since the Lead Agency compared the Proposed Project’s cancer risk to the South Coast AQMD’s CEQA significance threshold of 10 in a million to determine the level of significance for the Proposed Project’s health risk impacts, the Lead Agency should use a 30-year exposure period for sensitive receptors (residents and children at school and daycare facilities) and a 25-year exposure period for off-site workers to re-calculate the Proposed Project’s health risks in the Final EIR.

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4. Recommended Revisions to Existing Air Quality Project Design Features and Mitigation Measures (MMs)

Based on the air quality project design features and mitigation measures in the Draft EIR, the Lead Agency will require the use of electric powered or alternative-fueled concrete/industrial saws, pumps, aerial lifts, material hoist, air compressors, and forklift, and, at a minimum, require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (US EPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater during construction (Construction Project Design Feature 3.2-1)¹⁷. For on-road vehicles, the Lead Agency will strive to use heavy-duty trucks with ZE or NZE engines during construction and operation, and, at a minimum, require the use of heavy-duty trucks with 2010 model year engines or trucks with newer, cleaner engines during construction and operation (MMs 3.2-2(c)(3) and MM 3.2-2(d))¹⁸.

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NZE heavy-duty truck engines are commercially available. Examples of commercially available NZE heavy-duty truck engines that meet CARB’s optional low NOx standards include, but are not limited to, Cummins Westport 8.9- and 6.7-liter natural gas engines and Roush Cleantech 6.8- liter compressed natural gas and liquefied petroleum gas engines¹⁹. Therefore, NZE heavy-duty trucks should be required for use during construction (e.g., material delivery trucks and soil import/export) and operation (e.g., vendors and material delivery trucks).

CEQA requires that the Lead Agency considers mitigation measures to minimize significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. The Proposed Project’s construction and operational air quality impacts, particularly from NOx, would remain significant and unavoidable after mitigation. To comply with CEQA requirements, more electric powered construction equipment should be used. Additionally, since NZE heavy-duty truck engines are commercially available, the Lead Agency should also require the use of ZE heavy-duty trucks (e.g., material delivery trucks and soil import/export) during construction to further reduce the Proposed Project’s construction NOx emissions. South Coast AQMD staff also

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¹⁷ Draft EIR. Air Quality. Page 3.2-64.

¹⁸ Draft EIR. Summary. Pages S-55 and 56

¹⁹ CARB. “Optional Reduced NOx Emissions Standards for On-Road Heavy-duty Engines”. Accessed at: <https://ww3.arb.ca.gov/msprog/onroad/optionnox/optionnox.htm>

recommends ZE heavy-duty trucks (e.g., vendors and material delivery trucks) be used to further reduce the Proposed Project’s operational NOx emissions. When requiring electric construction equipment and ZE heavy-duty trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available in the Energy and Utilities and Service Systems Chapters of the Final EIR, where appropriate. Please see Attachment B for a list of companies and electric powered equipment that can and should be used during construction.

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Implementation of the Proposed Project contributes to Basin-wide NOx emissions. Requiring the use of more electric construction equipment and ZE heavy-duty trucks supports South Coast AQMD’s efforts to attain state and federal air quality standards as outlined in the 2016 Air Quality Management Plan (AQMP), specifically an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment^{20,21}. Requiring the use of more electric construction equipment and ZE heavy-duty trucks also fulfills the Lead Agency’s legal obligation to mitigate the Proposed Project’s significant air quality impacts and complies with CEQA’s requirements for mitigation measures.

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South Coast AQMD staff’s recommended revisions to Construction Project Design Feature 3.2-1, MM 3.2-2(c)(3), and MM 3.2-2(d) in strikethrough and underline are provided as follows.

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Construction Project Design Feature 3.2-1

[...].

Equipment such as concrete/industrial saws, pumps, aerial lifts, material hoist, air compressors, ~~and forklifts, excavator, wheel loader, and soil compactors,~~ must be electric or alternative-fueled (i.e., non-diesel). Pole power shall be utilized at the earliest feasible point in time, and shall be used to the maximum extent feasible in lieu of generators. If stationary construction equipment, such as diesel- or gasoline-powered generators, must be operated continuously, such equipment must be located at least 100 feet from air quality sensitive land uses (e.g., residences, schools, childcare centers, hospitals, parks, or similar uses), whenever possible.

[...].

Mitigation Measure 3.2-2(c)(3)

The project applicant shall require, ~~at a minimum,~~ that operators of heavy-duty haul trucks visiting the Project during construction commit to using ZE or NZE heavy-duty trucks during construction, such as trucks with natural gas engines that meet CARB’s

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²⁰ South Coast AQMD. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

²¹ Based on the air dispersion modeling that was performed to analyze the Proposed Project’s localized air quality impacts, the Lead Agency found that the Proposed Project would result in NO2 concentration of 0.132 parts per million (ppm) during construction and 0.127 ppm during operation. (Draft EIR. Chapter 3.2 Air Quality. Page 3.2-91 through 3.2-94). In the Appendix I: *Health Effects* of the 2016 AQMP, South Coast AQMD staff discussed a 2016 health study by the U.S. EPA. The study found that when adults with asthma are exposed to NO2 at the 100 parts per billion (ppb) to 300 ppb concentrations, they experienced an increase in airway responsiveness, which in asthmatics can worsen symptoms and reduce lung function. (Page I-54. Accessed at: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf>).

~~adopted optional NOx emission standard of 0.02 g/bhp-hr, or at a minimum, 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 grams per brake horsepower-hour (g/bhp-hr) for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. In addition, the project applicant shall strive require to use of zero-emissions (ZE) or near-zero-emissions (NZE) heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 g/bhp-hr. Contractors shall be required to maintain records of all trucks visiting the Project, and such records shall be made available to the City upon request.~~

Mitigation Measure 3.2-2(d)

~~The project applicant shall require the use of ZE or NZE vendors and material delivery trucks during operation such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr) provide incentives for vendors and material delivery trucks that would be visiting the Project to encourage the use of ZE or NZE trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, incentivize require the use of 2010 model year vendor and material delivery trucks.~~

If the specific details regarding ZE heavy-duty trucks are impractical or infeasible to include in the Final EIR, the Lead Agency should develop and include performance standards to achieve the use of ZE heavy-duty trucks (CEQA Guidelines Section 15126.4(a)). The Lead Agency can and should develop the following performance standards.

- 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.
- 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).
- Establish a policy to select and use vendors that use ZE heavy-duty trucks. Include this policy in the vendor contracts and business agreements.
- 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.
- Develop a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks.
- Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE heavy-duty trucks.

5. South Coast AQMD Rules

Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants²²

Presence of hexavalent chromium has been detected at the Proposed Project site²³. The Lead Agency should require dust control measures in accordance with South Coast AQMD Rule 1466, as applicable. Rule 1466 includes a list of dust control measures to reduce fugitive dust emissions from toxic air contaminants, such as hexavalent chromium, during earth-moving activities. For example, Rule 1466 prohibits conducting of earth-moving activities unless the area is surrounded with fencing that is a minimum six feet tall and at least as tall as the height of the tallest stockpile, with a windscreen with a porosity of $50 \pm 5\%$. PM10 monitoring will need to be conducted during earthmoving and vehicular traffic. Work stoppages, South Coast AQMD notification, and dust mitigation measures will need to occur if the site contribution exceeds 25 ug/m^3 of PM10 averaged over two hours. The Lead Agency should consider multiple downwind monitors and utilize PM10 monitors with telemetry to reduce response time to PM10 exceedances. Rule 1466 also includes speed limit, project date notification, signage, and recordkeeping requirements. Stockpiles will need to be maintained less than 400 cubic yards. Additionally, a Rule 403 Dust Control Supervisor will need to be on-site. Therefore, South Coast AQMD staff recommends that the Lead Agency include information on how the Proposed Project will meet the South Coast AQMD Rule 1466 requirements in the Final EIR. The information on Rule 1466 should also be included in the soil management plan.

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Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil²⁴

Presence of TPH has been detected at the Proposed Project site²⁵. Disturbed and excavated soils that may contain petroleum hydrocarbons are subject to the requirements of South Coast AQMD Rule 1166. Excavation operations will need to be monitored for VOC concentrations, and notification, work practice, and handling requirements will need to be implemented for elevated VOC readings. A Rule 1166 excavation plan application will need to be submitted to South Coast AQMD, or the site may be able to utilize a various locations plan. In addition, a discussion should be included regarding the treatment and handling of any VOC-contaminated soil. Therefore, South Coast AQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with South Coast AQMD Rule 1166 in the Final EIR. South Coast AQMD Rule 1166 should be incorporated in the soil management plan.

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Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith,

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²² South Coast AQMD. Rule 1466. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

²³ Draft EIR. Chapter 3.8: Hazards and Hazardous Materials. Page 3.8-42.

²⁴ South Coast AQMD. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

²⁵ Draft EIR. Chapter 3.8: Hazards and Hazardous Materials. Page 3.8-42.

reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the finding that the recommended revisions to the existing air quality project design features and mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

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ATTACHMENT B
List of Companies and Electric Powered Construction Equipment²⁶

Company Name	Construction Equipment Type
Volvo Construction Equipment	L25 electric compact wheel loader ECR25 electric compact excavator For more information, please visit: https://www.oemoffhighway.com/trends/electrification/press-release/21063694/volvo-construction-equipment-volvo-ce-unveils-electric-compact-excavator-and-wheel-loader-at-bauma
Hidromek	HMK 70W electric excavator HMK 145L SR crawler excavator HMK 635 WL wheel loader HMK 110 CS soil compactors HMK 130 CR soil compactors For more information, please visit: https://www.oemoffhighway.com/trends/equipment-launches/press-release/21045014/hidromek-hidromek-exhibits-new-electric-excavator-at-bauma-2019
Mecalac	e12 electric compact excavator For more information, please visit: https://www.oemoffhighway.com/trends/electrification/press-release/21002253/mecalac-france-sas-mecalac-offering-100-electric-machine

²⁶ForConstructionPros. *Electrified Construction Equipment Gaining Momentum*. January 27, 2020. Accessed at: <https://www.forconstructionpros.com/construction-technology/article/21107531/electrified-construction-equipment-gaining-momentum>.

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

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 account 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 are not now nor 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 Comments SCAQMD3-14 through -18, and Response to Comment SCAQMD3-22.

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

As identified in 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 by nearby sensitive receptors. See also Response to Comment SCAQMD3-19 for additional discussion of hexavalent chromium.

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 minimization requirements include the application of water or vapor suppressant.*

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.

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 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 reasonably 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 ensure that the City achieves its goal of additional employment opportunities for Inglewood residents and businesses, the proposed Development Agreement requires the developer, as the owner of the Arena, to take various actions to 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 may have access. As of today, 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.

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

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

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, as 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 capabilities of Southern California Edison (87,143 gigawatt-hours net energy for 2018)²³ (see Draft EIR, pages 3.5-28 and 3.5-29).

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

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

As such, all feasible electric construction equipment would be powered by electricity served to the Project Site by Southern 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 NO_x 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 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 Response to Comment SCAQMD3-5, the vast majority of earth moving activities at the Proposed Project would require heavy-duty capabilities beyond those of the 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, 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 as trucks with natural gas engines that meet CARB's low NO_x 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 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 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 Response to Comment SCAQMD3-5, 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 Response to Comment SCAQMD3-5, 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 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 achieve commitments to support 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 party vendors or tenants serviced by local small businesses through City mandated programs. In addition, in order to ensure that the City achieves its goal of additional employment opportunities for Inglewood residents and businesses, the proposed Development Agreement requires the developer, as the owner of the Arena, to take various actions to 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

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

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 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), 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 is likely not an indication of the presence of hexavalent chromium on the Arena Site, as further discussed below.

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 at the West Parking Garage and Well Relocation sites, and may indicate that hexavalent chromium was, in fact, not in the soil samples from these sites.

In addition, the digestion method used in the laboratory process likely elevated the reported hexavalent chromium levels at all three detected locations. More specifically, the detection of hexavalent chromium indicated in the laboratory results are likely caused by the conversion of some naturally occurring trivalent chromium into hexavalent chromium in the testing process. And thus, the laboratory detections likely do not indicate the presence of hexavalent chromium on the Project Site.

Due to hexavalent chromium showing up in samples, below commercial/industrial screening levels, the presence of hexavalent chromium in the method blank, the potential for the testing process to elevate hexavalent chromium levels, and the lack of historical evidence of industrial activities that could produce hexavalent chromium at the site, the reported laboratory detections of hexavalent chromium do not indicate the actual presence of hexavalent chromium above the screening level in soil at the Project Site.²⁷ 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 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

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

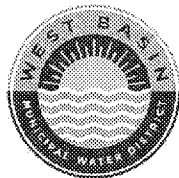
²⁶ In accordance with standard laboratory procedures for QA/QC, a method blank which is an analyte free matrix, is carried through the complete preparation and analytical procedure. The method blank is used to evaluate contamination resulting from the complete preparation and analytical procedure.

²⁷ EKI Environment & Water, Hexavalent Chromium Detections in Soil, Inglewood Basketball and Entertainment Center Project, May 28, 2020.

area if there are indicators that potential contamination has been encountered, 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 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 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



17140 S. Avalon Blvd.
Carson, CA 90746

310-217-2411
www.westbasin.org

March 16, 2020

Mindy Wilcox
Planning Manager
City of Inglewood
One West Manchester Blvd.
4th Floor
Inglewood, CA 90301
ibecproject@cityofinglewood.org

Subject: Inglewood Basketball & Entertainment Center Draft Environmental Impact Report (SCN #2018021056)

Dear Ms. Wilcox:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Inglewood Basketball and Entertainment Center (Proposed Project). West Basin Municipal Water District (West Basin), as a wholesale supplier of imported drinking water to the City of Inglewood (City), and a producer of recycled water to the region, understands the impacts of development projects, and the need for reliable water supplies to meet local water demands. Accordingly, West Basin has produced and served recycled water to the City for more than 20 years.

1

To further advance the use of recycled water within the City, West Basin identified the need for a recycled water disinfection station (Station) within the boundaries of the Proposed Project site. The proposed Station would improve the overall quality of recycled water, and promote its use within the City. Therefore, West Basin respectfully requests that a small area (approximately 1,000 square feet) of the Proposed Project property be designated for a future station. West Basin will coordinate with City engineers to identify an appropriate location that is accessible to West Basin to build and maintain the Station.

2

Please feel free to contact me or West Basin Operation Supervisor Frank Fuchs at (310) 660-6255 with further questions. West Basin looks forward to continuing our partnership with the City of Inglewood to deliver drinking and recycled water supplies to the City.

3

Sincerely,

Uzi Daniel
Manager of Operations
West Basin Municipal Water District

BOARD OF DIRECTORS

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

- 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.



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

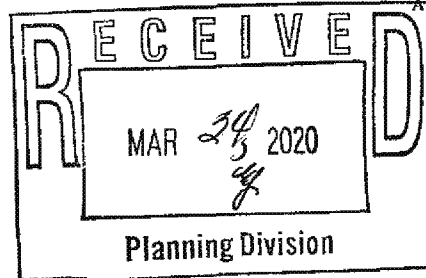
"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
<http://dpw.lacounty.gov>

MARK PESTRELLA, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

March 19, 2020



IN REPLY PLEASE
REFER TO FILE: LD-4

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

Dear Ms. Wilcox:

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

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

For specific revisions, additions, or deletions of wording directly from the project document the specific section, subsection, and/or item along with the page number is first referenced then the excerpt from the document is copied within quotations using the following nomenclature:

- Deletions are represented by a strikethrough.
- Additions are represented by *italics* along with an underline.
- Revisions are represented by a combination of the above.

1. General Comments

A. The DEIR should disclose the following County proposed traffic enhancements in Westmont-West Athens:

- The leading pedestrian intervals at the intersections of Century/Van Ness and Normandie/Century.

1

Ms. Mindy Wilcox
March 19, 2020
Page 2

- Curb extensions at Century Boulevard/Gramercy Place (Intersection #51) at the southeast and northeast corners. Note that although these curb extensions will not impede right-turning vehicles, please include a comment to the consultant to ensure that defacto right turn lanes were not assumed at this intersection in their line-of-sight calculations.

B. The DEIR should disclose the following potential County traffic enhancements in Lennox:

- The leading pedestrian intervals at the intersections of Lennox/Inglewood, Lennox/Hawthorne, 111th/Hawthorne, Lennox/Freeman, 104th/Inglewood, and 104th/Hawthorne.

For questions regarding comment No. 1, please contact Andrew Ross of Public Works, Transportation Planning and Programs Division, at (626) 300-4586 or aross@pw.lacounty.gov.

2. 3.7 Greenhouse Gas Emissions, 3.7.3 Regulatory Setting, 2017 Climate Change Scoping Plan Update, page 3.7-14 to 15:

The following revision should be made:

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

For questions regarding comment No. 2, please contact Nilda Gemeniano of Public Works, Environmental Programs Division, at (626) 458-5184 or ngemenia@pw.lacounty.gov.

3. Hydrology and Water Quality, 3.9.1 Environmental Setting, Flooding, page 3.9-8 to 9:

The document should clarify that the 100-year flood has a 1 percent chance of occurring in any given year and the 500-year flood has a 0.2 percent chance of occurring in any given year.



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(cont.)

Ms. Mindy Wilcox
March 19, 2020
Page 3

4. 3.9 Hydrology and Water Quality, 3.9.3 Regulatory Setting, Federal, page 3.9-13 to 14:

The document should clarify that the Code of Federal Regulations discussed is set forth by the National Flood Insurance Program's development standards for projects within floodplains.

5. 3.9 Hydrology and Water Quality, Impact and Mitigation (Impact 3.9-3), Analysis, page 3.9-29 to 30:

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

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

6. 3.14 Transportation and Circulation, 3.14.1 Environmental Setting, Operation, page 3.14-19 to 34:

Tables 3.14-7 and 3.14-8 should note the following intersections as either shared jurisdiction with the County or entirely within the County:

- Intersection #50 – Century Boulevard and Van Ness Avenue
- Intersection #66 – Lennox Boulevard and Freeman Avenue
- Intersection #74 – Hawthorne Boulevard and Westbound 105 off-ramp

7. Summary, Summary Table S-2, 3.14 Transportation and Circulation (b), page S 87:

Clarify the type of pedestrian flow management that will be used. The document should note the type of proposed management, particularly in the southwest corner of the proposed project site.

For questions regarding comment Nos. 6 and 7, please contact Andrew Ross of Public Works, Transportation Planning and Programs Division, at (626) 300-4586 or aross@pw.lacounty.gov.

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(cont.)

Ms. Mindy Wilcox
March 19, 2020
Page 4

8. 3.14 Transportation and Circulation, No. 3.14.4 Analysis Impacts and Mitigation through 3.14.5 Analysis Impacts and Mitigations with Concurrent Events:

The DEIR only considers line of sight E or F results as significant; however, multiple County intersections have significant impacts at LOS D, C, etc, thresholds. Please include/denote these as significant impacts as well and then address them in the mitigation section.

- Please use the enclosed ICU methodology for all signalized intersections and unsignalized intersections within or shared with the County.
- Address mitigations for each County-impacted intersection.
- Provide an event management plan to Public Works for review.

For questions regarding comment No. 8, please contact Kent Tsujii of Public Works, Traffic Safety and Mobility Division, at (626) 300-4776 or ketsujii@pw.lacounty.gov.

9. 3.15 Utilities and Service Systems, 3.15.16 Impact and Mitigation (Impact 3.15.11), Operation, page 3.15-80 to 81:

The document should clarify how the venue will comply with existing Assembly Bill 1826 (2014) law and future pending organic waste regulations per State Bill 1383 (2016). By the time the project is constructed, on-site facilities are expected to generate organic waste and will need to have systems in place to recycle their organic waste. Per State Bill 1383 regulations, the venue may be required to implement a food recovery program as a Tier 2 edible food waste generator.

10. 3.15 Utilities and Service Systems, 3.15.15 Regulatory Setting, State, page 3.15-75 to 76:

The following revision should be made:

"AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties are required to maintain the 50 percent diversion specified by AB 939 past the year 2000. ~~AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation.~~ The City of Inglewood's City-wide diversion rate per AB 939 was 62 percent in 2010."



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(cont.)

Ms. Mindy Wilcox
March 19, 2020
Page 5

For questions regarding comment Nos. 9 and 10, please contact Nilda Gemeniano of Public Works, Environmental Programs Division, at (626) 458-5184 or ngemenia@pw.lacounty.gov.

We request the opportunity to review the future environmental document for this project when it is available. If you have any questions or require additional information, please contact Jose Suarez of Public Works, Land Development Division, at (626) 458-4921 or jsuarez@pw.lacounty.gov.

Very truly yours,

MARK PESTRELLA
Director of Public Works



ANTHONY NYIVIH
Assistant Deputy Director
Land Development Division

JDC:kt

BPCHECKPLANCHECKINGFILES\PROJECTSSUBMITTEDBYOTHERAGENCIES\SR\PL2019007632INGLEWOODBASKETBALLANDENTERT.CENTER\DPWNOTCLEARED2020-2-3.

Enc.



Signalized Intersection (ICU Methodology)

ICU Level of Service	
LOS	V/C Ratio
A	0.00 – 0.60
B	0.61 – 0.70
C	0.71 – 0.80
D	0.81 – 0.90
E	0.91 – 1.00
F	> 1.00

ICU Significant Impact		
Pre-Project LOS	V/C Ratio	Project V/C Increase
A/B	0.00 – 0.70	Causing up to 0.75
C	0.71 – 0.80	≥ 0.04 (4%)
D	0.81 – 0.90	≥ 0.02 (2%)
E/F	0.91 or more	≥ 0.01 (1%)

Unsignalized Intersection (HCM Methodology)

HCM Level of Service	
LOS	Delay (sec/veh)
A	0 to 10
B	>10 to 15
C	> 15 to 25
D	> 25 to 35
E	> 35 to 50
F	> 50

HCM Significant Impact		
Pre-Project LOS	Delay (sec/veh)	Project Significant Impact
A/B/C	0 to 25	Causing LOS D or worse
D	> 25 to 35	5.0 seconds delay increase
E/F	> 35	2.5 seconds delay increase

Source: LA County Traffic Impact Analysis Report Guidelines (May 2007).

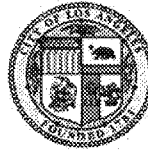
Letter **Toan Duong, Los Angeles County Department of Public Works**
LACDPW2 **March 24, 2020**
Response

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

CITY OF LOS ANGELES

CALIFORNIA

Seleta J. Reynolds
GENERAL MANAGER



ERIC GARCETTI
MAYOR

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

3900 Century Boulevard
LADOT Case No. OUT 20-107261

March 24, 2020

Mindy Wilcox, Planning Manager
City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, California 90301

Subject: **INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER PROJECT – DRAFT ENVIRONMENTAL IMPACT REPORT [SCH #2018021056]**

Dear Ms. Wilcox:

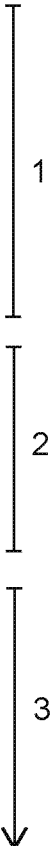
The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR), dated December 2019, for the proposed basketball and entertainment center generally located at the intersection of West Century Boulevard and South Prairie Avenue. Per the DEIR Project Description, the development would include construction of an 85,000 square-foot (SF) team practice and training facility, 25,000 SF sports medical clinic and 71,000 SF team office space, integrated into an arena structure that would accommodate an approximately 915,000 SF 18,000 fixed-seat arena. Contiguous to the Arena will be 48,000 SF of commercial space, 15,000 SF of community space, and a 650-space parking garage. The Project will also include a 150-guest room hotel with a 365-space parking garage, and an additional 3,110-space parking garage located just west of the Arena.

As noted in Table 3.124-3, the Project traffic study completed an analysis of 30 different project scenarios under both Baseline and Cumulative Conditions and included a study intersection radius ranging from 2 to 3 miles. While it is understood that much of the analysis conducted has significant overlap, in order to ensure that pertinent details within this overlap are not overlooked and to also further ensure that mitigation measures fully address potential project impacts, LADOT respectfully requests the opportunity to continue to provide feedback on the project analysis as part of the final environment review process.

TOPICAL COMMENTS ON THE TRAFFIC STUDY (Appendix K)

Adjusted Baseline

As discussed in the project report, construction has commenced on significant portions of the Hollywood Park Specific Plan (HPSP) located immediately north of the Project Site. The HPSP, which has a projected completion date of September 2021, is included in the Proposed Project's traffic analysis. The analysis included an evaluation of potential parking demands related to concurrent events at the future National Football League stadium in Inglewood.



Given that the Proposed Project is not expected to be complete and operational until mid-2024, the project analysis has been executed using an “adjusted baseline” calculation to establish the “existing” traffic conditions level against which to determine Project activity traffic increases. While LADOT agrees with this analytical approach, it should be noted that the “adjusted” traffic activity attributable to the HPSP is additional traffic, that in and of itself, will contribute significant traffic activity increases to City of Los Angeles intersections while also creating elevated baseline traffic conditions for the proposed project. Therefore, although the IBEC project is being analyzed separately from the HPSP, there is clearly a need to ensure comprehensive coordination between the two projects, particularly in regard to stadium events. In order to provide comprehensive mitigation and ongoing collaboration, a cooperative mitigation program for both projects should be considered.

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(cont.)

Traffic Mitigations

Of the 28 study intersections located, either wholly or partially, within the City of Los Angeles, the report indicates that the project could potentially result in significant traffic impacts at up to 19 locations, with 13 impacts directly attributed to the project and 19 impacts occurring under a unique scheduling confluence when a Forum event and Major Project event occur concurrently. In order to ensure appropriate redress to the City of Los Angeles potential impacts, LADOT would like to augment the cited Mitigation Measures as follows:

4

1. 3.14-1 (a), Event Transportation Management Plan (TMP): Include additional language that **requires** communication with LADOT Special Traffic Operations (STO) staff to ensure that appropriate measures are considered to address potential event related queuing conditions on street traffic managed by LADOT, including the potential deployment of traffic officers at critical intersections.

5

2. 3.14-2 (c), West Century Boulevard / La Cienega Boulevard Physical Improvement: The Project identified a physical improvement to install dual eastbound and westbound left-turn lanes and a westbound exclusive right-turn lane. Inasmuch as the proposed mitigation still requires LADOT review and approval, LADOT requests that the mitigation description include language that **requires** the project to, should the proposed mitigation be deemed infeasible, provide a commensurate substitute mitigation. Therefore, please modify the current mitigation directive to include the following:

6

“c) Should these improvements be deemed infeasible at the time of reconciliation, the LADOT may substitute an alternative measure of equivalent effectiveness. A substitute measure that can improve the overall safety and operation of this intersection could include, but not be limited to, providing of transportation systems management (TSM) measures or a commensurate contribution to such measures.”

3. 3.14-3 (j), Centinela Avenue / La Cienega Boulevard Physical Improvement: The Project identified a physical improvement to remove the north-leg raised median island to accommodate dual southbound left-turn lanes. Similar to mitigation 3.14-2(c) above, inasmuch as the proposed mitigation still requires LADOT review and approval, LADOT requests that the mitigation description include language that **requires** the project to provide a commensurate substitute mitigation should the proposed mitigation be deemed infeasible. Therefore, please modify the current mitigation directive as follows:

7

“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 the southbound La Cienega Boulevard at Centinela. Should this improvement be deemed infeasible at the time of reconciliation, the LADOT may substitute an alternative measure of equivalent effectiveness. A substitute measure that can improve the overall safety and operation of this intersection could include, but not be limited to, providing

↓

of transportation systems management (TSM) measures or a commensurate contribution to such measures.”

↑ 7
(cont.)

4. Transportation Demand Management

LADOT appreciates the Project’s goal of reducing vehicle trips and encouraging other more sustainable travel modes. This is consistent with local and state mobility objectives, and greenhouse gas emission and VMT reduction goals. Accordingly, the passage of Senate Bill (SB) 743 requires that greater emphasis be placed on the implementation of TDM strategies in order to create more sustainable travel options and reduce the demand for single occupancy vehicle travel. While LADOT is supportive of the very robust TDM program that has been envisioned for the IBEC project, in order to ensure that the application of these strategies provides the greatest mitigation radius possible, the TDM Program should provide an opportunity for collaboration. Therefore, LADOT respectfully requests that the Project TDM mitigation measure include additional language that requires annual reporting of travel patterns and statistics to be provided not only to the City of Inglewood but to LADOT as well to inform ongoing event-day transportation management strategies.

8

5. Event Transportation Management Plan

LADOT recognizes that a comprehensive event transportation management plan (TMP) is essential in addressing the dynamic conditions created by event traffic. Therefore, as with the Project’s TDM program, in order to ensure that the TMP provides the greatest mitigation reach possible, the TMP should provide an opportunity for collaboration. Therefore, to reiterate the addressment of mitigation measure 3.14-1(a) above, LADOT requests that the TMP mitigation measure include additional language that requires coordination with LADOT’s Special Traffic Operations (STO). The STO Office at LADOT has extensive experience in the management of special event traffic and providing this coordination will ensure that the effective radius of the TMP will be applied to the greatest extent possible. The Project does not identify specific measures to address the potential impact to key City of Los Angeles corridors leading into the project. Therefore, it is imperative that further collaboration on this issue be afforded in order to fully explore potential mitigation. The discussion of this mitigation should also include direction to determine an appropriate agreement instrument in order ensure appropriate funding for any necessary event-day resources.

9

6. Intelligent Transportation Systems (ITS)

As illustrated in the ITS investment planned by the Project along various corridors within the City of Inglewood, the implementation of ITS measures is a critical mitigation action needed in order to ensure the capability for dynamic traffic management and that the signal systems of the different agencies communicate in real time. Since the DEIR discloses that several City of Los Angeles study intersections cannot be directly mitigated, LADOT would like the Project mitigation program to include a commensurate ITS package, to be determined in consultation with appropriate LADOT staff, that can be used to address these impacts.

10

All transportation improvements and associated traffic signal work within the City of Los Angeles will require final review and approval through the City’s Bureau of Engineering B-Permit Program. Other suggested cooperative mitigation should be coordinated through LADOT’s West Los Angeles and Coastal Development Review Office.

11

SPECIFIC STUDY REPORT QUESTIONS / COMMENTS / CLARIFICATIONS

- 1. If the analytical scenarios are presumably presented in a lowest project activity level to highest project activity level manner then it is similarly presumed that any impacted location under a lower activity scenario will also be impacted under the higher activity scenario. Similarly, it is also presumed that

↓ 12

because the Cumulative analysis scenarios begin with a baseline level higher than the adjusted baseline analysis scenarios, it is expected that impacted locations will likely be affected under a greater number of cumulative scenarios than under the adjusted baseline analysis. Therefore, for those locations where this is not the case, please clarify. Some example locations are listed below:

↑ 12 (cont.)

a. Century Boulevard & Western Avenue and Manchester: significant impact identified under the Cumulative (With the Forum) Plus Major Event Weekday Post-Event Peak Hour scenario but not under the Cumulative (With the Forum and Mid-Sized event and NFL Stadium) plus Major Event Weekday Post-Event Peak Hour scenario. A similar result is shown for Manchester Avenue and Vermont Avenue.

13

b. Century Boulevard & Concourse Way: significant impact identified at this location under the Adjusted Baseline (With Mid-Size Event) Plus Major Event Weekday Pre-Event Peak Hour scenario but not under the Cumulative (With Mid-Sized Event) plus Major Event Weekday Pre-Event Peak Hour scenario.

14

2. Century Boulevard & Van Ness Avenue: the intersection CMA worksheets should be updated to reflect the current northbound lane configuration which is 1 left-turn lane, 1 through lane and 1 de-facto right-turn lane instead of 1 left-turn, 1 through and 1 through-right.

15

3. Tables / Figures: information needs to be cross-reference reviewed and corrected for locations that are not simultaneously identified in both presentations. Example, Manchester Avenue and Western Avenue Adjusted Baseline Plus Project Daytime Event PM Peak Hour impact is reflected in Figure 3.14-13 but not reflected in corresponding Table 3.14-59.

16

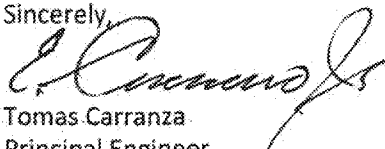
CONCLUSION

The project analysis identified significant potential impacts to key City of Los Angeles corridors leading to the project. The project analysis also identified the significant role TDM and event management planning will play in the mitigation program for this project. Therefore, in order to ensure the best possible strategy for fully addressing the potential impacts of this project, it is imperative that the final environmental impact review process include additional collaboration with LADOT so that critical coordination details can be fully explored and a final collaborative addressment plan can be determined.

17

If you have any questions, please contact Eddie Guerrero at 213-972-8476 or Robert Sanchez at 213-485-1062.

Sincerely,

FOR → 
Tomas Carranza
Principal Engineer

- c: Council District 8
- Council District 11
- Lupe Sandoval, LADOT Special Traffic Operations
- Lisa Trifiletti, Perla Solis, Trifiletti Consulting
- Tom Gaul, Netai Basu, Fear & Peers

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 proposed project. 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 project 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 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:

<u>City of Los Angeles Department of Transportation (LADOT)</u>	<u>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.</u>
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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 <u>0.783</u>	C
		CMA	City of Los Angeles	AM	0.640	B
				PM	0.704 <u>0.728</u>	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 <u>0.428</u>	A
				Weekend Pre-Event	0.608 <u>0.616</u>	B
		CMA	City of Los Angeles	Weekday Pre-Event	0.648	B
				Weekday Post-Event	0.303 <u>0.349</u>	A
				Weekend Pre-Event	0.541 <u>0.551</u>	A

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

#	Intersection	Methodology ^{a,b}	Jurisdiction ^a	Peak Hour	Adjusted Baseline No Project		Adjusted Baseline Plus Project ^c	
					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	<u>0.802</u> <u>0.828</u>	D	<u>0.808</u> <u>0.832</u>	D
		CMA	City of Los Angeles	AM	0.670	B	0.677	B
				PM	<u>0.749</u> <u>0.776</u>	C	<u>0.755</u> <u>0.780</u>	C

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

Intersection	Methodology ^{a,b}	Jurisdiction ^a	Peak Hour	Adjusted Baseline No Project		Adjusted Baseline Plus Project ^c		
				V/C or Delay	LOS	V/C or Delay	LOS	
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/Los Angeles County	PM	<u>0.802</u> <u>0.828</u>	D	<u>0.844</u> <u>0.868</u>	D
					CMA	City of Los Angeles	PM	<u>0.749</u> <u>0.776</u>

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		Adjusted Baseline 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	0.754	C	0.790	C
				Weekday Post-Event	<u>0.401</u> <u>0.444</u>	A	<u>0.642</u> <u>0.660</u>	B
				Weekend Pre-Event	<u>0.656</u> <u>0.666</u>	B	0.740	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.696	B	0.736	C
				Weekday Post-Event	<u>0.321</u> <u>0.365</u>	A	<u>0.578</u> <u>0.596</u>	A
				Weekend Pre-Event	<u>0.593</u> <u>0.603</u>	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		Cumulative Plus Project ³		
				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	0.885	D
				PM	<u>0.894</u> <u>0.933</u>	D E	<u>0.900</u> <u>0.937</u>	D E
		CMA	City of Los Angeles	AM	0.725	C	0.737	C
				PM	<u>0.745</u> <u>0.788</u>	C	<u>0.751</u> <u>0.792</u>	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		Cumulative Plus Project ^c		
				V/C or Delay	LOS	V/C or Delay	LOS	
50	Van Ness Ave/West Century Blvd	ICU	Inglewood/ Los Angeles County	PM	<u>0.894</u> <u>0.933</u>	D E	<u>0.936</u> <u>0.973</u>	E
					CMA	City of Los Angeles	PM	<u>0.745</u> <u>0.788</u>

**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	<u>0.436</u> <u>0.478</u>	A	<u>0.677</u> <u>0.694</u>	B
				Weekend Pre-Event	<u>0.743</u> <u>0.772</u>	C	<u>0.823</u> <u>0.832</u>	D
		CMA	City of Los Angeles	Weekday Pre-Event	0.691	B	0.730	C
				Weekday Post-Event	<u>0.257</u> <u>0.303</u>	A	<u>0.515</u> <u>0.533</u>	A
				Weekend Pre-Event	<u>0.587</u> <u>0.617</u>	A B	<u>0.671</u> <u>0.682</u>	B

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

#	Intersection	Methodology ^{1,2}	Jurisdiction 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	<u>0.802</u> <u>0.828</u>	D	<u>0.844</u> <u>0.868</u>	D		
		CMA	City of Los Angeles	AM	0.670	B	0.683	B		
				PM	<u>0.749</u> <u>0.776</u>	C	<u>0.794</u> <u>0.819</u>	C D		

TABLE 3.14-60
INTERSECTION OPERATIONS – ADJUSTED BASELINE PLUS PROJECT (MAJOR 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	Weekday Pre-Event	0.754	C	0.790	C		
				Weekday Post-Event	0.401 <u>0.444</u>	A	0.642 <u>0.660</u>	B		
				Weekend Pre-Event	0.656 <u>0.666</u>	B	0.740	C		
		CMA	City of Los Angeles	Weekday Pre-Event	0.696	B	0.736	C		
				Weekday Post-Event	0.321 <u>0.365</u>	A	0.578 <u>0.596</u>	A		
				Weekend Pre-Event	0.593 <u>0.603</u>	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/ <u>Los Angeles County</u>	AM	0.873	D	0.899	D		
				PM	<u>0.894</u> <u>0.933</u>	D E	<u>0.936</u> <u>0.973</u>	E		
		CMA	City of Los Angeles	AM	0.725	C	0.753	C		
				PM	<u>0.745</u> <u>0.788</u>	C	<u>0.791</u> <u>0.831</u>	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	<u>0.436</u> <u>0.478</u>	A	<u>0.677</u> <u>0.694</u>	B		
				Weekend Pre-Event	<u>0.743</u> <u>0.772</u>	C	<u>0.823</u> <u>0.832</u>	D		
		CMA	City of Los Angeles	Weekday Pre-Event	0.691	B	0.730	C		
				Weekday Post-Event	<u>0.257</u> <u>0.303</u>	A	<u>0.515</u> <u>0.533</u>	A		
				Weekend Pre-Event	<u>0.587</u> <u>0.617</u>	A B	<u>0.671</u> <u>0.682</u>	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 <u>0.611</u>	A <u>B</u>	0.809 <u>0.827</u>	D
				Weekend Pre-Event	0.658 <u>0.668</u>	B	0.786	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.701	C	0.821	D
				Weekday Post-Event	0.499 <u>0.544</u>	A	0.757 <u>0.775</u>	C
				Weekend Pre-Event	0.595 <u>0.606</u>	A <u>B</u>	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 <u>0.688</u>	B	0.802	D
		CMA	City of Los Angeles	Weekend Pre-Event	0.617 <u>0.627</u>	B	0.749	C

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	Adjusted Baseline (with Midsize NFL Stadium Event) No Project		Adjusted Baseline (with 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	0.775	C	0.846	D
				Weekday Post-Event	0.536 <u>0.579</u>	A	0.702 <u>0.720</u>	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.720	C	0.795	C
				Weekday Post-Event	0.465 <u>0.510</u>	A	0.643 <u>0.661</u>	B

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	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)	
					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 <u>0.630</u>	A B	0.754 <u>0.772</u>	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.725	C	0.824	D
				Weekday Post-Event	0.520 <u>0.565</u>	A	0.697 <u>0.715</u>	B C

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	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)	
					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	0.694 <u>0.701</u>	B <u>C</u>	0.887	D
		CMA	City of Los Angeles	Weekend Pre-Event	0.630 <u>0.641</u>	B	0.839	D

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	Cumulative (with The Forum) No Project		Cumulative (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	0.845	D	0.957	E
				Weekday Post-Event	0.603 <u>0.645</u>	B	0.844 <u>0.861</u>	D
				Weekend Pre-Event	0.745 <u>0.774</u>	C	0.869 <u>0.878</u>	D
		CMA	City of Los Angeles	Weekday Pre-Event	0.695	B	0.813	D
				Weekday Post-Event	0.435 <u>0.481</u>	A	0.693 <u>0.711</u>	B <u>C</u>
				Weekend Pre-Event	0.589 <u>0.620</u>	A <u>B</u>	0.719 <u>0.730</u>	C

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	Cumulative (with Football Game at NFL Stadium) No Project		Cumulative (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	0.765 <u>0.794</u>	C	0.886	D
		CMA	City of Los Angeles	Weekend Pre-Event	0.611 <u>0.641</u>	B	0.738	C

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	Cumulative (with Midsize NFL Stadium Event) No Project		Cumulative (with 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	0.862	D	0.932	E
				Weekday Post-Event	0.571 <u>0.613</u>	A B	0.737 <u>0.754</u>	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.714	C	0.787	C
				Weekday Post-Event	0.410 <u>0.447</u>	A	0.579 <u>0.597</u>	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 <u>0.664</u>	B	0.789 <u>0.806</u>	C <u>D</u>
		CMA	City of Los Angeles	Weekday Pre-Event	0.719	C	0.817	D
				Weekday Post-Event	0.456 <u>0.501</u>	A	0.634 <u>0.653</u>	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 <u>0.802</u>	C <u>D</u>	0.971	E
				CMA	City of Los Angeles	Weekend Pre-Event	0.619 <u>0.650</u>	B

**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 <u>0.611</u>	A <u>B</u>	0.809 <u>0.827</u>	D		
				Weekend Pre-Event	0.658 <u>0.668</u>	B	0.786	C		
		CMA	City of Los Angeles	Weekday Pre-Event	0.701	C	0.821	D		
				Weekday Post-Event	0.499 <u>0.544</u>	A	0.757 <u>0.775</u>	C		
				Weekend Pre-Event	0.595 <u>0.606</u>	A <u>B</u>	0.731	C		

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	Cumulative (with The Forum) No Project		Cumulative (with The Forum) Plus Project		Cumulative (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	0.845	D	0.957	E		
				Weekday Post-Event	0.603 <u>0.645</u>	B	0.844 <u>0.861</u>	D		
				Weekend Pre-Event	0.745 <u>0.774</u>	C	0.869 <u>0.878</u>	D		
		CMA	City of Los Angeles	Weekday Pre-Event	0.695	B	0.813	D		
				Weekday Post-Event	0.435 <u>0.481</u>	A	0.693 <u>0.711</u>	C		
				Weekend Pre-Event	0.589 <u>0.620</u>	A B	0.719 <u>0.730</u>	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**

#	Intersection	Methodology ^{1,2}	Jurisdiction 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
98	<u>Western Ave/ Manchester Blvd</u>	<u>CMA</u>	<u>City of Los Angeles</u>	<u>PM</u>	<u>0.877</u>	<u>D</u>	<u>0.941</u>	<u>E</u>		

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



Metro

Los Angeles County
Metropolitan Transportation Authority

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Los Angeles, CA 90012-2952

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March 24, 2020

Mindy Wilcox, AICP
City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301
Sent by Email: ibecproject@cityofinglewood.org

RE: Inglewood Basketball and Entertainment Center (IBEC)
Draft Environmental Impact Report (DEIR) – Metro Comments

Dear Ms. Wilcox:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Inglewood Basketball and Entertainment Center (Project) located in the City of Inglewood (City). Metro is committed to working with the City on transit-supportive developments and planning efforts to grow ridership and reduce driving.

Per Metro’s area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with comments on the Draft Environmental Impact Report (EIR) for the Project. Specifically, this letter provides comments regarding the Project’s potential impacts on Metro services and facilities which should be analyzed in the EIR and provides recommendations for mitigation measures and project design features, as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

Metro recognizes the Project’s significance to the City and the greater Los Angeles County region. Metro and the City have been collaborating closely on several efforts, including implementation of the Crenshaw/LAX Project (K Line), transit-oriented development (TOD) specific plans, the Inglewood First/Last Mile Plan, the Centinela/Florence Grade Separation, and event transportation demand management for SoFi Stadium. We are committed to continuing a collaborative approach with respect to this Project. In particular, we appreciate the EIR consultation meeting held between our respective staffs on March 3, 2020. Looking ahead, we look forward to continuing coordination on rail and bus services serving the Project site, the operations of the proposed shuttle service, and other improvements to the Event Transportation Management Plan for the Project.

¹ See CEQA Guidelines section 15064.3(a); Governor’s Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

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3

Project Description Summary

The Project area is bounded by West Century Boulevard on the north, South Prairie Avenue on the west, South Doty Avenue on the east, and an imaginary straight line extending east from West 103rd Street to South Doty Avenue to the south. The Project includes an approximately 915,000-square foot (sf) Arena Structure design to host the LA Clippers basketball team with up to 18,000 fixed seats for National Basketball Association (NBA) games. A six-story parking structure containing 3,110 parking spaces would be located within the West Parking Garage Site. The East Transportation and Hotel Site would include a parking garage (365 spaces) and transportation hub to accommodate private vehicle parking. The Project would also include a limited-service hotel use with up to 150 rooms and an approximately 1.3-acre portion of the East Transportation and Hotel Site.

4

Comments on EIR Analysis

Section 2.5 – Project Description: Project Elements

Page 2-58, “Shuttle Service”: The narrative indicates that the Project would provide shuttle service connecting the Project site to Metro’s Hawthorne/Lennox Station (C Line - Green) and La Brea/Florence Station (K Line). The draft Event Transportation Management Plan (EIR Appendix K.4, p. 17) indicates that shuttle service would be provided from Metro’s Downtown Inglewood Station and possibly Aviation/Century Station along the K Line. Please review and revise to ensure consistency throughout the EIR. Metro’s recommendations on provision of shuttle service are provided below in the “Rail Operations Comments” section of this letter.

5

Section 3.14 - Transportation and Circulation

Page 3.14-47, “Fixed-Route Bus Service”: The narrative describes scheduling shakeups as occurring in December and July of each year. This should be corrected to December and June (not July). Also, shakeups include both minor and major changes (not just minor as the narrative describes).

6

Page 3.14-53, “Adjusted Baseline Transit Assumptions”: The narrative describes rail operating plan C-3 that was adopted by the Metro Board of Directors (Metro Board) as being a two year service plan; however, the Metro Board motion indicates the proscribed period is only one year (not two). See Board report as noted in EIR’s footnote.

7

Page 3.14-130, “Transit System Evaluation”: Metro C Line trains are typically two-car trains; however, service is shifted to one-car or two-car trains starting in the 9 PM hour each night on weekdays. The calculations of train capacity in Table 3.14-36 do not reflect this reduction for weekday night post-event time periods. Also, existing C Line schedules provide three trains an hour after 7 PM (one train every 20 minutes in each direction). During weekends, the C Line operates every 15 minutes with two-car trains during the day, and every 20 minutes with one-car or two-car trains in the evenings. C Line service and headways may or may not change once the K Line opens. Depending on resource availability such as rail cars, train operators, and budget, Metro Rail Operations may be able to keep two-car trains in service later than the 9 PM hour to accommodate post-event demand.

8

Also, please note that the K Line is being designed to provide service with three-car trains. However, platform lengths on segments of the existing C Line can only accommodate two-car train service. Metro is seeking grant funding from the State of California to extend platforms at four C Line stations. However, in the event that such grant funding is not secured, trains may be limited to two-car service which would limit their carrying capacity for events at the Project site.

Centinela/Florence Grade Separation

In January and February 2017, the Metro Board directed staff to conduct preliminary studies for a potential grade separation project for the K Line at the Centinela/Florence intersection. In mid-2020, Metro staff is expected to present the results of the studies and seek the Board’s direction on proceeding with further engineering design and environmental clearance of this project. While funding and tentative construction timelines have not yet been identified by the Board for this project, the City and Applicant should be advised that construction of this project may coincide with construction of the Inglewood Basketball and Entertainment Center. For the duration of the grade separation construction, the K Line could have operational limitations and therefore may not provide the same level of service to the arena and other venues in the vicinity temporarily.

9

Bus Operations Comments

Service: Metro Bus Lines 211/215, 212/312, and 117 operate on West Century Boulevard and South Prairie Avenue, adjacent to the Project. Two Metro Bus stops are directly adjacent to the Project at West Century Blvd. and South Prairie Ave. Other transit operators may provide service in the vicinity of the Project and should be consulted. The Applicant should be aware of the bus facilities and services that are present and that transit services are likely to be expanded in the future to provide connections to the existing C Line and future K Line.

10

Bus Stop Locations: Bus stops located on the far side of the intersection are generally preferred over near side bus stops for Metro bus operations. This keeps the bus from being stopped twice by the same traffic signal. It also is safer because most bus passengers alighting at the stop will walk to the rear of the bus greatly reducing the potential for a bus versus pedestrian accident. Metro approves of the relocated North Prairie Ave bus stop from near side of Century Blvd to far side, as well as of the permanent location identified for the East Century bus stop far side of Prairie Ave.

11

During construction of the project, the City proposes to relocate temporarily the existing East Century/Prairie bus stop from far side of the intersection (southeast corner) to nearside (southwest corner) which is presently deficient in length to accommodate buses. This temporary relocation potentially creates a safety hazard and could adversely affect public transit operations (considered a significant environmental impact as described on EIR page 3.14-63). Metro requests that the bus stop instead temporarily be relocated further west to approximately 60 feet west of the Starbucks driveway, where more adequate space is available and ADA-compliant sidewalk access for bus riders can be provided. Construction of parking facilities on the parcel west of the Starbucks driveway may cause the temporary stop to be relocated from time to time, and we encourage ongoing communication with Metro prior to and throughout the construction process, as noted below.

12

ADA Access: In general, temporary or permanent modifications to any bus stop as part of the Project, including any surrounding sidewalk area, must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel between the bus stop and the Project. Non-compliant bus stops will not be served by Metro as it is a violation of passengers’ civil rights under Federal law. Recommended bus stop design dimensions may be found in Appendix D of Metro’s Transit Service Policy (attached).

13

Coordination During Project Construction: To facilitate coordination with Metro Bus Operations during Project construction in support of Mitigation Measure 3.14-15, Metro recommends that the following information be included in the Project’s Construction Traffic Management Plan:

14

“The 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.”

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(cont.)

Rail Operations Comments

Metro encourages event attendees and Project employees and staff to take transit to/from the Arena, and we look forward to continuing coordination between the City, Applicant, and Metro Rail Operations and Bus Service Planning on the development of the Event Transportation Management Plan (ETMP) for the Project. To ensure optimal operations and attendee experience, we note the following comments and recommendations, which should be incorporated into a revised ETMP and in other related Project plans as appropriate.

15

Funding for Augmented Rail Operations

As discussed in our coordination meeting (March 3, 2020), Metro would like to open discussions with the City and Applicant on assistance with identifying a long-term funding source for additional rail service and related costs to support events at the Project site. As noted below, Metro’s support of events will likely involve additional costs for more frequent rail service and associated personnel for logistics, law enforcement, and traffic control.

16

Shuttle Service

Rail stations served: We suggest that the shuttle service provide consolidated connections to no more than two (2) Metro Rail stations (likely Downtown Inglewood Station on the K Line, and Hawthorne/Lennox Station on the C Line). Limiting the service to two stations reduces the amount of workforce, logistics, law enforcement, traffic control and general support provided by Metro as well as by the Applicant. We recommend further discussion between Metro, the City, and Applicant on determining which stations should be served. Once the shuttle service is fully operational, we highly encourage the Applicant to coordinate with Metro’s Special Events Bus and Rail Team to meet demand and make changes to servicing rail stations with Metro’s input.

17

We also recommend that the Applicant leverage existing Metro Bus services that will already be connecting the Project site to Metro Rail stations as part of its overall ETMP strategy.

18

Shuttle Service provision: The EIR should describe/confirm, in the Project Description section and/or the Transportation and Circulation section:

- a) whether the shuttles will be a private bus service, funded and/or provided by the Applicant, or a municipal/public-provided service;
- b) the frequency of shuttles (headways) proposed for event days;
- c) whether fares for the shuttle will be free, paid, or TAP-card enabled.

19

Shuttle service hours and augmenting staff (law enforcement, traffic officers and general support) pre- and post-event should be extended on days with concurrent events at the Forum or SoFi Stadium to assist with excessive pedestrian and vehicle traffic.

Rail station/shuttle bus interface:

Curb space: Adequate curb space and/or bus berths should be allocated and designated for shuttle bus stops at each of the rail stations to be serviced. This is necessary to ensure safe and efficient service by shuttle buses and regular Metro Bus and Rail operations, as well as overall vehicular circulation. Metro has completed the Metro Transfers Design Guide, a best practices document on transit improvements. This can be accessed online at <https://www.metro.net/projects/systemwidedesign>.

20

Street Closures: Pre- and post-event planning may or may not require street closures and/or queuing of event attendees on the sidewalk (i.e., public right-of-way) to uniformly control crowds. The City and Applicant should coordinate with transportation and public works staff of local jurisdictions where the shuttle services is anticipated to connect to Metro rail stations within and outside the City of Inglewood (e.g. City of Hawthorne, City of Los Angeles, County of Los Angeles) to identify needs for allocation of curb space and sidewalks.

21

Staff Support: Additional traffic officers and law enforcement support should be provided by the Applicant at transfer locations between rail and the shuttle service (at street level, not Metro property) to mitigate pedestrian and vehicle conflicts at intersections and sidewalks on the day of the event.

Wayfinding: A robust and comprehensive master sign program and wayfinding signs (well-lit for nighttime events) should be implemented to direct attendees to the bus shuttles to and from the arena and at all shuttle stops.

Transit Ticketing: The Applicant should consider allowing Metro TAP/Revenue staff to sell Metro fare media (one way, roundtrip, and day passes) to attendees inside the arena or on the property to help alleviate overcrowding at rail station ticket vending machines after events.

21

Transit Supportive Planning: Recommendations and Resources

Metro would like to make the following recommendations to maximize the Project’s potential synergies associated with transit-oriented development. This will support the Project’s efforts to reduce vehicle trips as required by the Project’s certification under Assembly Bill (AB) 987 by achieving a greater mode shift to transit and active transportation:

22

1. Active Transportation: Metro strongly encourages the Applicant to maximize the installation of Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations.
2. Bicycle Use and Micro-mobility Devices: The Project should provide adequate short-term bicycle parking for event attendees, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for employees. As proposed, the Project provides approximately 23 short-term spaces and 60 long-term spaces for bicycle parking, and potentially a bike valet (EIR p. 2-43; 2-44). The Association of Bicycle and Pedestrian Professionals (APBP) recommends that bicycle parking be provided to accommodate 2% of the seating capacity of an event venue (see APBP’s *2010 Bicycle Parking Guidelines*).

23

24

Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred



spacing dimensions, so bicycle parking can be safely and conveniently accessed. If a bike valet is proposed, its location should be designated in Project plans.

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(cont.)

Similar provisions for micromobility devices are also encouraged. Metro also encourages the City and Applicant to explore participation in the Metro Bike Share program.

3. First & Last Mile Access: The Project should maximize opportunities to improve first-last mile connections to and from Metro Rail stations, as described in the Inglewood First/Last Mile Plan which was adopted in February 2019. Please review this plan, located online at https://www.metro.net/projects/inglewood_flm/.

25

4. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.

26

5. Transit Pass Programs: Metro would like to inform the Applicant of Metro’s employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs’ website at <https://www.metro.net/riding/eapp/>.

27

If you have any questions or would like to discuss contents in this letter, please contact me by phone at 213-922-2671, by email at DevReview@metro.net, or by mail at the following address: Metro Development Review, One Gateway Plaza, MS 99-22-1, Los Angeles, CA 90012-2952.

28

Sincerely,


Shine Ling, AICP
Manager, Transit Oriented Communities

Attachment:

- 2015 Metro Transit Service Policy, Appendix D

Los Angeles County
Metropolitan Transportation Authority

TRANSIT SERVICE POLICY

OCTOBER 2015



Metro

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Metro Rapid Stop



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EXECUTIVE SUMMARY

The Transportation Service Policy (TSP) document sets forth the policies, principles and requirements that will be used by Metro staff in the design or modification of the current service network in order to better serve our customers and make better use of available operating resources. Subsequent analyses will determine the actual service changes to be made in accordance with the requirements of the public review process. This document updates the 2012 version previously adopted by the Board.

BACKGROUND

On June 25, 2015, the Metro Board of Directors (Board) was given an update on the short- and long-term fiscal capacity of the agency.¹ The overall assessment of the agency's financial health is that both capital and operating programs are at risk given:

- The potential for economic downturn could trigger a recession event. Presently bids for capital projects are coming in higher than anticipated and operating costs are rising faster than the Consumer Price Index (CPI);
- Borrowing strategies which use the capacity of Propositions A and C are at risk because fares are not keeping pace with costs, and the demand for Access Paratransit services is growing;
- New revenue sources are an important component for the agency's fiscal stability.

Nearly \$1.8 billion in projects have been added to the Short Range Transportation Plan (SRTP) for the period from FY2015 to FY2024. This has created the potential for a \$1.0 billion operating shortfall when combined with the need for specialized services for individuals that cannot use public transportation. A fare increase would help keep the projected shortfall to the estimated \$1.0 billion mark. However, if fares remain flat, if Americans with Disabilities Act (ADA) costs continue to rise, and/or the region experiences an economic downturn, the shortfall could more than double to \$2.1 billion, jeopardizing Metro's ability to support the critical services needed by the residents and visitors of Los Angeles County.

In March 2015, the Board directed staff to look at ways to innovate and redesign the service system to better meet the transportation needs of the Los Angeles region. The principles outlined in the TSP are intended to carry the agency forward and support improvements to Metro's core transit services such as improved on-time service, greater service frequencies on core network bus services, and increased rail bus interface and coordination.

Forecasts of Local and Rapid Bus Revenue Service Hours (RSH) allocations for the agency reflect a slight overall reduction in the number of hours over the next several years. Conversely, Bus Rapid Transit (BRT) RSHs are expected to grow with the projected conversion of Rapid Line 720 to BRT in FY2016. Total annual Bus RSHs are fixed at 7,061,735 for FY2016 through FY2018, falling slightly with the introduction of the Regional Connector and the

¹ Fiscal Stability Overview and Funding Commitments Inventory (2014 SRTP Financial Update), Item 19.

Crenshaw Lines in FY2020. Table 5.1 in Section 5 of this document displays the allocation of Bus RSHs by year. Clearly, the supporting bus network will be constrained over the next several years.

Additions to existing transit services including new rail projects Expo Phase 2, Gold Line Foothill Extension, Regional Connector Transit Corridor, and the Crenshaw/LAX Transit Project should be considered as enhancements to the system. These new rail services will expand and enhance the travel options for residents and visitors to Los Angeles County.

As a result of the recognized budgetary constraints, the Board of Directors engaged the American Public Transportation Association (APTA) to conduct a peer review of our service principles, fare structure, and mechanisms for acquiring and identifying new sources of revenue. Their recommendations were published in January 2015.

The APTA Peer Review panel made a number of recommendations to increase efficiency and productivity. The most significant of those recommendations is to increase the allowable number of standees on buses from 30% of a seated load to 40% of a seated load. The Committee also recommended that improvements in overall speed of the system were needed to increase the productivity of operations. Finally, the Committee recommended that resources be moved from less productive lines to higher productivity services to better accommodate passenger demand. A detailed listing of their recommendations is presented in Section 1.5 APTA Peer Review Committee.

In addition, Metro consulted with its own Peer Review Committee (PRC) to provide input and recommendations on:

1. Identification of gaps in the 15-minute frequent service network. Gap closure recommendations were prioritized by Service Planning staff into four categories (A-D). As discussed in Section 5, categories A and B will be incorporated into the work program and implemented in phases. Later phases will incorporate recommended changes identified as priorities C and D.
2. Incorporation of the APTA Peer Review Committee findings into the TSP. The most significant change was in the loading standard for buses based on seats by vehicle type and time of day; (see Section 4.1). The methodology for calculating the Route Performance Index (RPI) used to evaluate a bus route's performance has been changed to evaluate all lines in sequence rather than within their specific service types. Hence, instead of measuring the performance of Express routes as a class of service, the Express routes were evaluated alongside all other routes. These evaluations are completed quarterly and will include an evaluation of the impacts of the service changes implemented.
3. Establishment of a policy direction that outlines when a Municipal operator may be considered to assume Metro bus line operation; see Section 4.4. Before a bus line can

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be assumed by another operator, Metro must cancel the service and observe all public notice and hearing guidelines.

The document also provides for recommendations to improve the core Bus and Rapid service network, consideration of changes to the owl network, along with service guidelines developed for each type of service. The goal is to develop a high frequency network of sustainable services that provide a quality ride to our customers.

The principles enumerated below and supported by service standards outlined in Sections 2 and 3 of the document are summarized as follows:

1. Aggressively feed rail transit stations with convenient transfers to provide customers with faster and more frequent services.
2. Identify core bus services and increase the peak frequencies to 15-minute headways. These services were reviewed and identified for enhancement by the PRC.
3. Change our bus load factors to better tailor service based on service frequency, vehicle size, and peak or off-peak operation. This includes a change to the method used to calculate the maximum load at the peak load point. Specifically, the approach is to use the mode in lieu of the average so that service calculations are based on the most likely expected load.
4. Cull out seldom used stops to improve the in-service speed of the system and productivity.
5. Upgrade the remaining Bus Rapid network with more frequent service and seek opportunities to increase the number of Rapid services
6. Redesign and enhance the owl bus network in conjunction by: reallocating resources where needed, improving timed connections to facilitate convenient transfers with very little wait times, and improving access to late night services and destinations in conjunction with Rail operations.
7. Work with Municipal and Local Return operators to improve service connections and facilitate transfers between operators. Where possible, allow Metro to reinvest in its core services by allowing Local providers the opportunity to operate more service in their reserved service area.
8. Seek expansion of point-to-point Express services or BRT-type services to extend the reach of the system, provide faster services, make connections between major centers of activity, and encourage choice riders to use public transportation.
9. Seek to innovate in the areas of service provision and provision of first mile-last mile connections.

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- 10. Seek to insure the involvement of our labor partners as the plan and program are developed and initiated through the planning and public review process.

The TSP is a comprehensive guide for the development of public transportation services for the Los Angeles region. This update to the TSP recognizes funding constraints and seeks to establish principles for the use and distribution of scarce transit resources. Sections 5 and 6 deal with implementation of the proposed changes and direct the analysis and public information process and procedures that would be fulfilled to bring the recommended changes to fruition.



Metro Orange Line

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SECTION 1: INTRODUCTION, PURPOSE & BACKGROUND

1.1 Introduction

Public transportation is a major force in redefining of communities both within Los Angeles County and neighboring counties. Transportation providers must be more nimble and capable to respond to the mobility needs of the next generation of Angelenos who increasingly use technology to arrange their travel needs. Furthermore, service providers are no longer confined to just buses and trains, but must embrace and enhance the entire experience from the time a customer leaves their home to the time they reach their ultimate destination.

The Los Angeles County Metropolitan Transportation Authority (Metro) takes its role as a regional service provider broadly and is moving to enhance first mile-last mile transit options along with its program of rail expansion and development of a strategic bus network. Service quality, speed and frequency of service, as well as community connections are key elements of a strategic planning process that seeks to continually create a seamless and easy way to navigate the regional transportation systems.

Metro is keenly aware that as steward of the public dollars allocated to it, the agency is expected to make wise use of its resources. The provision of well-used, cost-efficient, reliable, and effective service is a prime mover for all transit agencies. “To attain this goal, public transit agencies must design their services around a clear and defined process as well as a process to monitor the results achieved and respond accordingly.”² This document puts forth those principles and standards.

Strategic Bus Network Plan, Peer Review Committee, and APTA Peer Review Process

Metro has taken on a multi-faceted campaign to increase ridership in Los Angeles. In addition to annual evaluations of its current transit services, Metro engaged APTA and representatives of its Local Service Councils to assist the agency in the refinement of the Strategic Bus Network Plan (SBNP)³ and take other reasonable steps to improve the current systems’ performance and close service gaps towards building a sustainable network of high quality, very frequent services. Metro is focused on allocating resources to maximize the benefits of

² “Best Practices in Transit Service Planning,” Project#BD549-38 Final Reports, Center for Urban Transportation Research, University of South Florida, March 2009.

³ The Strategic Bus Network Plan (SBNP) was developed through collaboration with the City of Los Angeles’s Planning Department and a consultant, TMD. The purpose of the plan is not only to provide a foundation for short term service adjustments, but to provide a basis for mid and long term coordination with other planning efforts (e.g. the City of LA’s Mobility Plan 2035), infrastructure investments (e.g. bus lanes, transit priorities, sub-regional transfer facilities), and funding opportunities (e.g. Cap and Trade, Sales Tax Measure). The plan has not yet gone to the Metro Board for adoption; however, Metro staff is in the process of developing recommended next steps and a path forward for the use and application of the plan. Metro staff worked with the Service Councils to develop specific service recommendations based on the proposed Strategic Bus Network Plan, as recommended by an APTA Peer Review.

service to transit riders while ensuring that service delivery is efficient and cost effective. Achieving this delicate balance requires establishing policy guidance and service standards that are designed to achieve target levels of productivity, efficiency, quality, and equity.

Metro is committed to providing high quality transit service to all of its customers. These goals are reflected in Metro's Vision, Mission, and Core Business Goals, and carried forward as the foundation of this Transit Service Policy (TSP).

Vision

The agency is envisioned to be a world class operation that provides excellence in all of the services offered as well as excellence in supporting the continued growth and redevelopment of the region. Metro must insure that: our customers feel safe when riding, that they do so in clean equipment, service is reliable and on-time, and our staff is dedicated to providing service in a courteous manner.

Mission

Metro is responsible for the continuous improvement of an efficient and effective transportation system that is sustainable for Los Angeles County.

Core Business Goals

- Goal 1: Improve Bus & Rail Transit Services
- Goal 2: Provide Excellent Customer Service
- Goal 3: Deliver Metro's Bus & Rail Projects
- Goal 4: Ensure Civil Rights Compliance
- Goal 5: Deliver Metro's Highway & Freeway Projects
- Goal 6: Increase Emphasis on Safety & Security

In times of fewer resources, Metro's success to meet challenges related to serving the diverse needs of current and potential passengers, communities, and operators will be contingent on innovative thinking that stems from a solid base of sound planning principles. In addition, Metro seeks to work with other municipal operators and local return operators to provide support and connectivity throughout the Los Angeles region.

1.2 2015 Peer Review Committee (PRC)

To help develop policy guidance for service development, Metro established a Blue Ribbon Committee (BRC) in November 2009 represented by key stakeholders who serve as operators in the region as well as beneficiaries of transit service. In 2015, a new committee was formed with much of the same membership. This committee was designated a Peer Review Committee (PRC) and met five times to review elements of the TSP and make recommendations relative to the service network.

The PRC recommended a service concept conveyed as a set of policy statements that provides a blueprint to build a better transit system for greater regional mobility while consuming fewer resources. The service concept also defines the roles of Metro Bus, Rail, and municipal

operations, identifies and prioritizes essential service quality attributes, and recommends policy guidance on service coordination, bus-rail integration, and reduction of duplicative services. The key principles of the service concept set policy direction for Service Priorities, Service Design, Service Quality Attributes, and Governance. A list of the 2015 PRC participating members is provided in Appendix A.

Summary Position Statement

Increased regional coordination and integration of service, and improved reliability are essential to having a seamless system that is convenient, simple to use, and of high quality – and provides maximum benefit in light of scarce resources.

- **Service Priorities:** Service should be focused first in high-density areas and be scaled to fit the overall density and passenger demand in the service area.
- **Service Design:** The network should be coordinated and designed to be simple and user-friendly to increase trip-making by existing riders and attract new riders.
- **Service Attributes:** The system should provide high quality transit service to better serve existing riders and attract new riders. Service quality priorities include:
 - Reliability
 - Fast travel options
 - Real-time information
 - Clean and safe transit vehicles, stops, and transit facilities (e.g. Transit Centers, Park & Ride, Rail Stations, etc.)
- **Governance:** Metro should serve as a facilitator to coordinate services among operators in the region.

Ultimately, the policy guidance is reflected in the TSP as a set of regional network and service design guidelines, performance criteria and standards. In addition, this document outlines the service change process that provides the quantitative tools to evaluate the system, identifies opportunities for service improvements, and ensures the regional transit system is adjusted accordingly to achieve the goals and objectives of the service concept.

1.3 Purpose

Metro's TSP establishes the following: (1) a formal process for evaluating existing services; (2) a methodology and process for developing and implementing service adjustments; and (3) service design guidelines to ensure that the transit system is developed consistent with policy guidance approved by the Metro Board of Directors.

The TSP was originally adopted in 1986 and is reviewed on an annual basis. When required, the TSP is updated to better reflect agency goals and objectives, major initiatives, and changes in local, state, and federal regulations and funding.

This document updates the 2012 TSP formerly adopted in July 2012. The policy is organized into seven sections:

- Introduction, Purpose & Background

- Designing a Regional Transit Network
- Service Design Guidelines
- Service Performance Evaluation
- Implementing the Plan
- Service Change Process
- Conclusion

1.4 Background

Metro is the 3rd largest transit provider in the United States. Metro’s service area is over 1,400 square miles and is divided into five distinct service areas overseen by their respective Metro Service Councils; their role and responsibilities are described in Section 3.1. Metro supports transit operation throughout Los Angeles County with an annual budget of approximately \$5.668 billion. In 2016, Metro will spend \$1,050.4 billion on its bus operations and \$399.2 million on its rail operations. The remainder of the budget goes toward fare subsidies, funding a number of other local return operators, and funding Access Services, the principal ADA paratransit provider in the County. Table 1.1 displays the major budget categories and expenditures for 2016.

Table 1.1

Summary of FY2016 Expenditures by Program

Expense Category	FY16 Budget	Comments
Metro Bus & Rail Operations	\$1,472.4 billion	Includes Bus, Rail, operations & regional activities
Metro Capital Expenses	\$2,131.3 billion	Includes operating capital and new construction
Subsidy Funding Programs	\$1,373.1 billion	Metro distributes subsidies to Municipal Operators, Local Return Operators, Metrolink, and Access Services ⁴
Congestion Management & Highways	\$ 93.1 million	Includes Freeway Service Patrol, Express Lanes, Call Box, Intelligent Transp., and Rideshare services
General Planning & Programs	\$ 169.8 million	Includes Planning programs and studies, Legal, audit, treasurer, Transit Court and other, and Property Management/Union Station and Development
Debt Service	\$ 328.7 million	
Total FY 2016 Expenditures	\$5,568.4 billion	

Source: LACMTA FY2016 Adopted Budget for July 1, 2015 – June 30, 2016, Summary of Expenditures by Program, Page 34.

Metro’s transit system consists of light rail, heavy rail, and bus operations. Metro’s bus operations consist of both directly operated and contract operated services. Metro operates

⁴ It is important to note that Metro Operations is a recipient of the distribution of subsidies from Metro as regional service provider. Metro does not directly subsidize other operators.

the largest share of all bus services provided in the region. However, municipal and Local Return operators provide additional public bus and paratransit services in areas of the region where Metro provides limited service or no service at all.

Metro currently operates 169 bus routes, of which 18 routes are contracted out, and 6 rail lines. On weekdays, Metro currently operates 1,957 peak buses and 190 peak heavy and light rail cars. On any given weekday, Metro experiences approximately 1.1 million bus boardings and 350,000 rail boardings. Metro serves over 15,000 bus stops, including station stops on the Orange Line and Silver Line. Metro operates six rail lines (2 heavy and 4 light rail lines) serving a total of 73 stations across approximately 84 route miles. Metro Rail operates in heavily congested travel corridors and provides connections to many key multi-modal transportation hubs.

Measure R and the 30/10 Initiative

Metro will continue to expand its transit network across the region under Measure R and the 30/10 Policy Initiative. In November 2008, Los Angeles County voters approved Measure R, a half-cent sales tax. The measure is expected to generate \$35 billion for countywide transportation projects over 30 years. In April 2010, Metro's Board of Directors adopted the 30/10 Initiative to use revenue from Measure R as collateral for long-term bonds, grants, and anticipated federal loans that will allow Metro to reduce the time needed to build 12 major transit projects from 30 years to 10 years. Part of the funds generated through Measure R will be used to expand Metro Rail projects throughout the region. Five of the twelve projects listed or under consideration are currently under construction and projected to begin operations within the next several years; one project has been completed:

- Gold Line Foothill Extension to Azusa (FY 2016)
- Exposition Line – Phase II to Santa Monica (FY 2016)
- Crenshaw/LAX Transit Project (FY 2020; subject to change with addition of Airport Metro Connector)
- Regional Connector Transit Corridor Project (FY 2021)
- Purple Line Extension to Westwood (Section 1 Extension to La Cienega FY 2023; Section 2 to Century City FY2026; Section 3 to Westwood FY2035)
- Gold Line Eastside Extension from East Los Angeles – Phase II (Under Study)
- Rail Extension to South Bay (Under Study)
- Orange Line Canoga Extension (completed)
- Airport Metro Connector
- East San Fernando Valley Transit Corridor
- West Santa Ana Branch
- Sepulveda Pass

Figure 1.1 illustrates Metro's projected rail network by 2022 along with its Metro Liner services (Orange Line and Silver Line).

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Figure 1.1 Metro Rail Projected Concept Map

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1.5 APTA Peer Review Committee

In 2014, Metro contracted with APTA to perform a peer review of the restructured fare policies, proposals to increase the efficiency and productivity of service operations, and to provide guidance on alternative sources of revenues to support operations. The panel met in Los Angeles during the week of January 26-30, 2015. As a result of their review, the panel made the following recommendations to increase efficiency and productivity:

1. Adjust the bus load standard from 1.3 to 1.4 and ultimately consider going to an area-based standard;
2. Consider implementation of a bus stop consolidation plan to improve speed of operations;
3. Initiate a system-wide program to improve in service on time performance;
4. Seek to coordinate operations with other local service providers in the region;
5. Adopt and implement a policy to guide the redeployment of resources from chronically underperforming routes or route segments to higher performing locations and times;
6. Develop a service design to minimize duplication and encourage transfers among transit modes;
7. Provide frequent service on a more sparsely configured network;
8. Realign services to establish and maintain a core network of frequent services, and;
9. Encourage the use of the system at off-peak times.

These recommendations, along with the recommendations of the PRC, have been incorporated into the service policies and standards outlined in this document.

2015 PRC Recommendations

The 2015 PRC was composed of members of the Regional Service Councils and other operators in the region. The PRC's work included a review of the proposed 15-minute frequent service bus map along with major change proposals that are incorporated into this update to the TSP. The PRC completed a number of tasks and made recommendations as follows:

1. Identified and recommended development of services to address gap closures in the 15-minute frequent service network. Gap closure recommendations were prioritized by Service Planning staff into four categories (A-D). As discussed in Section 5, categories A and B will be incorporated into the work program and implemented in phases.
2. Recommended incorporation of the APTA Peer Review Committee findings into the TSP. The most significant was the change in the loading standard for buses based on seats by vehicle type and time of day; see Section 4.2.
3. Established a policy direction for consideration of assumption Metro line services by Municipal operators; see Section 4.4.

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4. Recommended that Metro and other operators ensure that adequate layover facilities be provided or that the transit service provider be aware of additional costs incurred for consolidation or relocation of bus services.

The PRC made significant contributions to the generation of the 2016 TSP.



Patsaouras Plaza Dodger Stadium Shuttle Operation 2015

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SECTION 2: DESIGNING A REGIONAL TRANSIT NETWORK

Transit network design must take into account both the needs of passengers and transit operators, as well as the practical ability to provide the service. From the passenger’s perspective, the transit network should provide convenient service when and where they need to go, operate on time and safely, and provide good customer service and information. From a system-wide transit operations perspective, the transit network must be manageable, operable, and sustainable – all within the constraints of a fixed operating budget.

2.1 Key Principles of Network Design

At times, competing service interests result in unproductive use of scarce transit resources. As such, the PRC was charged with identifying and prioritizing the needs of the customer and the operator. Based on recommendations from the PRC, the critical factors to consider in network design should be reliability, network simplicity, speed, and safety, followed by vehicle cleanliness and timely, relevant, accurate customer information.

Based on the PRC policy guidance, the following key principles are critical in building an efficient and effective transit network:

A. Develop a Network of Services Rather than a Collection of Individual Routes

Individual routes do not need to serve all market needs. Rather, routes should be designed to serve a specific purpose within the network. Combined, the network should provide service between all major destinations and densely populated areas throughout the day. The transit network includes integration of other public transportation services within Los Angeles County, as well as with other modes, such as bikes, carpool/vanpool, car share, and private shuttles that provide first and last mile transportation to better access the transit network.

B. Integrate Services to be “Seamless to the User”

Transfer Penalties Should Be Minimized

In developing an integrated network, it is essential that the system is seamless-to-use from a customer’s perspective. The need to create a simple and convenient system that minimizes transfer penalties is critical. An integrated regional network should emphasize high frequency service, timed transfers on less frequent services, and shared stops for ease of transfers. Trip information, way-finding, and an integrated fare structure also are important elements of a customer-focused transit network.

Services Must Be Better Coordinated

Given the significant growth in municipal and local return operators as well as Metro Rail, improved coordination between all operators and modes is vital to establishing an integrated regional transit network. Metro serves as a regional coordinator of transit services. In addition, Metro operates within a hierarchy of services, in which Metrolink provides the region’s commuter rail to serve high volume, longer distance trips. Metro Rail, Metro Liner

(Orange Line and Silver Line), and Metro Rapid Bus serve as the backbone of the urban transit network, which is augmented by Metro-operated Local, and Limited stop, service along with municipal operators. LADOT and local return operators complement the system with community and shuttle buses that serve specific neighborhood needs.

Metro meets quarterly with various municipal and local return operators who may be impacted by Metro's service changes. (Section 5.2 discusses the service change process in greater detail.)

Minimize Duplication and Increase Shared Stops

From both the patron and operator point of view, operation of overlapping services may be costly, confusing and unproductive. Through better service coordination, duplication between Metro Bus, Metro Rail, and municipal bus services can be minimized. This concept will result in an easier and simpler-to-use transit network. Opportunities to share stops will also help reduce confusion.

Customer Trip Information Must be Timely and Readily Available

Timely, relevant, accurate, and readily available trip information is necessary to minimize rider confusion when using public transit. Patrons should always be kept informed about the status of their trip. Real-time information is useful for reassuring passengers when the next transit vehicle will arrive or how long the expected delay time is if there has been a service disruption. It should provide them with enough information to help them decide whether to continue to wait for the next transit vehicle, consider alternate routes, or take another mode of transportation to complete their trip.

C. Keep the Service Simple and Easy to Use

An easy-to-understand-and-use transit system relies on simple network and route design. Consolidating duplicative services on the same or parallel corridors within a quarter-mile to a half-mile distance provides an opportunity to simplify the network for ease of use and reduce unused capacity. This concept requires better coordination of schedules and transfer points, and will result in an easier-to-use and more convenient system while reducing wait time and overall travel time. These enhancements to service quality are expected to help increase ridership and revenue at no additional cost.

Furthermore, consistent headways that are predictable for patrons help to reduce uncertainty about next bus arrival times. Consistent headways should be a priority for lines that operate headways of less than 15 minutes.

D. Ensure High Quality Services

Establishing a world-class transportation system requires identifying and prioritizing service quality attributes that support an effective and sustainable operation. The following are critical service quality attributes of highest priority to consider when designing service:

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Reliability

When it comes to key service quality attributes, reliability should be given highest priority. Reliability is impacted by poor schedule adherence, vehicle breakdowns, and missed trips. Controlling service reliability requires a coordinated effort between establishing reasonable running times and schedules, maintenance and management of vehicles, and operator availability and performance. Service levels are scheduled to meet passenger levels. Early, late or missed trips result in capacity issues and can eventually lead to pass-ups. Therefore, it is essential that service is on time and reliable to avoid the misperception that service levels are inadequate to meet demand.

Maintaining passenger confidence that transit service will depart a stop or station and arrive at a destination as stated on the timetable is paramount to good transit service. Poor reliability can cause passengers to arrive late to work or school, miss appointments or critical transit connections, and result in an overall lack of confidence in the system. Furthermore, poor reliability creates unnecessary travel delays and greater concerns about safety and comfort due to longer waits at stops and stations.

For high frequency service with 15 minutes headways or better, schedules should be written to allow operators to be on time without excessive running time that can slow the service substantially and result in additional operating costs. Passengers who miss a trip on high frequency services can be comforted knowing that another bus or train will be available within a reasonable wait time, minimizing the consequences of reliability.

Reliability becomes even more critical for low frequency service with headways greater than 15 minutes and as wide as 60 minutes. Missing trips on low frequency service increases the consequences to the passenger given the significant travel delays and wait times. Therefore, special attention should be made to ensure low frequency services are designed and operated to the greatest reliability and efficiency.

Achieve Higher Network Speeds

Increasing the speed of transit service improves the competitiveness of transit as compared to other modes, such as automobiles. Faster service also requires fewer resources to operate, thus reducing operating costs. Several factors can contribute to the reduction of speed along a route including excessive turns, particularly left turns, an increased number of stops, traffic-congestion, and long dwell times at stops and stations.

Increasing bus system speed reduces operating costs and may attract new riders. However, streamlining routes and limiting the number of stops may also reduce passenger access to the transit network. Therefore, adjustments to a route that result in slower speeds are warranted when the ridership benefits outweigh the negative impacts to speed.

Passenger Capacity

Passenger capacity, or the amount of seats and standing room onboard a vehicle, is an important consideration when designing transit service. The utilization of vehicle capacity should be maximized to make the most use of resources. However, capacity should not

exceed a threshold that deters ridership due to uncomfortably crowded conditions or excessive stop and station dwell times caused by blocked passageways on board.

Capacity thresholds are expressed as a load factor indicating the ratio of available capacity to seats as discussed in Section 4 (Table 4.3). This indicator is used to determine how many trips must be scheduled for each direction of travel during specified time periods.

Other considerations that may influence design capacity include the duration that passengers must stand based on passenger turnover along the line and operating conditions, such as on freeway routes in which standees should be minimized.

Safe Routing and Stops

Passenger perceptions of safety and security conditions, either real or imagined, must be addressed because those perceptions contribute to mode choice decisions. Safety includes the potential for being involved in a crash, slips and falls, and other elements such as aggressive passengers or poor passenger conduct. Security covers both real and customer perception of potential incidents of crime that may contribute to a passenger's unease, even if the actual risk is minimal or non-existent.

Passengers want to feel safe and secure both at stops/station and onboard a bus/rail. Measures must be taken to alleviate a passenger's unease both at stops and onboard transit vehicles. Whenever possible, stops should be located at well-lit areas with ample sidewalk space for ADA compliance and queuing for buses. Other measures to enhance security at stops and on board transit vehicles include police officers in uniform and plainclothes who ride transit, two-way radios, silent alarms for emergency communications, and surveillance cameras at stops and on board transit vehicles. Metro's bus operators form the core of the agency's response to any situation that may arise while driving in service. Operators have the ability to silently alert Bus Operations Control (BOC) and /or local law enforcement. They are the initial incident responder and must remain in contact with BOC.

Cleanliness and Courtesy

Clean and well-maintained transit stops, stations, and vehicles improve the general public's perception of Metro and their desire to take transit as a viable mode of travel that is comfortable, convenient, and of high quality. Elements make transit more comfortable for passengers include climate-controlled vehicles, seat comfort and availability, courteous operators, and a comfortable ride.

2.2 Markets Served

Given the current financial climate, Metro's goal is to minimize costs and maximize productivity in the delivery of its transit services. Service should be placed when and where the maximum benefit can be provided to the general public. Productive service lowers the net cost per hour, resulting in more service per dollar.

In general, service should be focused on corridors and within areas where high density population, employment, and activity centers exist. These corridors and areas usually generate high levels of transit riders to justify frequent service (15-minute or better headways) that provides convenient access to key origins and destinations. Corridors and areas with dense ridership should be served throughout the day and week. The emphasis on service should be during peak periods, base day, weekends, and late night, in priority order.

While service should focus on when and where significant demand exists, there is still a need to provide basic lifeline service in areas and times of day with low demand. Therefore, a basic lifeline network should be provided on critical corridors during the owl period and to connect low density areas to the transit network.

2.3 Transit Service Classifications

Metro classifies its bus and rail services into three categories to provide the framework for evaluation and planning of the various components of the transit network.

Core Regional Network

Core regional service consists of Metro Liner (Metro Orange Line, Metro Silver Line), Metro Rapid, Metro Local (for bus lines averaging 9,000 or more boardings per weekday), and Metro Rail. Together these lines form the basic network in the region and serve the region's major activity centers and market areas. Other regionally significant lines may be under consideration for service improvements as part of the Strategic Network and are discussed in Section 5.

Significant Corridor Bus Services

Significant corridor bus services provide regional service along major arterials throughout the service area and carry 4,000 to 9,000 riders per day. Metro operates 14 Local lines, one Express line, and 10 Rapid lines that meet this threshold. These lines cover long distances, serving both intra- and inter-community trips, and have an average trip length of approximately 5.2 miles.

Inter-Community and Community Service

Inter-Community and Community Service supplements the core service, provides primary coverage in outlying areas, feeds the fixed-route system, and provides community circulation focusing on local travel. This includes the remainder of the system including Local and Express lines.

2.4 Metro Transit Service Types

Metro operates six types of bus service (Table 2.1) and two types of rail service to better match the transit mode with specific passenger demand and needs. (See Appendix B for Metro's Bus Line Identification, Route Numbering, and Color Conventions.)

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Metro Rail

Metro Rail is high capacity rapid transit service using rail technology. It operates along a dedicated right-of-way, serves full scale transit stations, and is powered by electricity. The rail system serves as a backbone of public transportation in the greater Los Angeles region, linking many key multi-modal transportation centers and destinations together.

Service operates in high-demand travel corridors and is offered in two forms – heavy rail and light rail. Metro’s heavy rail is the subway system served by the Red and Purple Lines. Metro’s four light rail lines – Blue, Green, Gold and Expo – are powered by overhead wires, generally use shorter trains, and operate at slower speeds than heavy rail. Unlike heavy rail, light rail lines run along a right-of-way ranging from complete grade separation to at-grade in mixed flow traffic. Rail routes are designated with route numbers between 800 and 899.

Metro Liner and BRT Services

Metro Liner services are specialized BRT services that operate on either an exclusive right-of-way, a major arterial, or in HOV/HOT lanes. Metro operates two Liner routes: the Orange Line which operates on its own exclusive right-of-way, and the Silver Line which operates on the I-10 and I-110 Express Lanes (freeway toll lanes) as well as surface streets through downtown. Metro Liner services are numbered between 900 and 910. As a form of BRT, Metro incorporates a series of design features to reduce delays, increase reliability and improve passenger comfort:

- **Dedicated Bus Lanes:** This right of way provides fewer traffic conflicts and obstructions and reduces delays and travel time.
- **High-Capacity Vehicles:** State-of-the-art high-capacity vehicles are used to meet high demand and provide greater passenger comfort.
- **Transit-Signal Priority:** An operational strategy that facilitates the movements of in-service transit vehicles through signalized intersections to improve transit performance by extending the green phase or shortening the red phase of traffic signals.
- **Bus Stations and Shelters:** Stations and shelters provide customers with enhanced comfort and safety.
- **Streetscape:** Streetscape and other design features such as landscaping, pedestrian count-down signals, bicycle racks, and well-designed crosswalks make it easier for pedestrians and bicyclists to access the stations.
- **Improved Fare Collection:** For faster service and convenience, major stations have ticket vending machines (TVMs) which allow passengers to prepay.
- **Park & Ride Facilities:** Should be provided in close proximity to major stops and stations. Adjacent development and joint use parking also is encouraged.
- **Advanced Transportation Management Systems:** ATMS provide an array of technologies to improve service reliability and passenger travel.

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Metro is currently studying the feasibility of adding bus lanes on a number of major corridors to further improve travel times. A peak period bus lane on Wilshire Blvd. benefiting Rapid Line 720⁵ opened in FY2015. In addition to two rail alternatives, there are two BRT alternatives being evaluated in the environmental document for the Van Nuys Blvd. corridor in the east San Fernando Valley. If BRT is chosen as the preferred alternative, the project could provide a seamless connection to the Metro Orange Line.

Metro Rapid

Metro Rapid is a form of BRT that operates in mixed-flow traffic on heavily traveled corridors. Time reductions are achieved through the use of a number of key BRT attributes such as fewer bus stops and transit signal priority. Metro Rapid services use specially branded buses and enhanced bus stops that include special shelters and information kiosks. Metro Rapid Lines are designated with route numbers between 700 and 799.

Service warrants guide the design, monitoring and development of the Metro Rapid program. The warrants are specific targets or objectives that are linked to each of the program's key attributes. These warrants are presented in Appendix B. Current Metro Rapid Lines in operation are evaluated as outlined in Section 4.0.

Metro Express

Metro Express is used for longer distance trips with fewer stops and typically becomes more localized near the ends of the routes. Metro Express service usually operates from a collector area, such as a Park & Ride location, to a specific destination or in a particular corridor with stops en-route at major transfer points or activity centers. In addition, a major portion of its routing generally operates on freeways either in mixed flow traffic, *HOV* and/or *HOT* lanes, or dedicated bus lanes. This service type charges a premium fare. Express services serving downtown Los Angeles are given a 400 route number, while those that do not go downtown are given a 500 route number.

Metro Limited Stop

Metro Limited is an accelerated bus service with limited stops. Metro Limited operates in corridors with high transit demand and provides higher-speed services by limiting stops to key transfer points and major activity centers. It is augmented by Local bus service. Metro Limited bus service does not include signal priority or unique branding. Limited stop routes are designated with route numbers between 300 and 399.

Metro Local

Metro Local services operate on city streets and provide service to all stops along a route. The bulk of Metro's transit service and ridership is provided by Metro Local. Local routes are designated with route numbers between 1 and 299.

⁵Local Line 20 also benefits from use of the peak bus lanes.

Metro Shuttle

Shuttle routes operate primarily on secondary streets and serve short-distance trips. These services specialize in local community circulation and connect residential neighborhoods with local trunk-line transit services, including rail. Typically these services carry less than 2,000 passengers a day. These bus routes are designated with route numbers between 600 and 699. Table 2.1 describes the various features of each of Metro’s bus service types.

Table 2.1

Metro Bus Service Types and Features

FEATURES	BUS SERVICE TYPES				
	Local/ Limited	Express	Shuttle	Rapid	Metro Liner
Right of Way	Major Arterials	Major Arterials and Fwys.	Local Streets	Major Arterials	Dedicated Right-of-Way
Minimum Average Stop Spacing	0.25 mile / 0.60 mile	1.25 miles	0.25 mile	0.80 mile	1.25 miles
Target Travel Market	Inter-Community	Inter-Community Regional	Neighborhood	Inter-Community	Inter-Community
Vehicle Type	40/60-foot bus	40-foot bus	40-foot bus or smaller	40/45/60-foot buses	45/60-foot buses
Color Coded Buses	California Poppy	California Poppy	California Poppy	Rapid Red	Silver
Communities Served	Multiple	Multiple	1 - 2	Multiple	Multiple
Signal Priority	No	No	No	Yes	Yes
Fare Collection	On Board	On Board	On Board	On Board	On Board /Pre Pay ⁶
Passenger Amenities	Benches and Shelters	Shelters and Stations	Benches and Shelters	Shelters and Stations	Shelters and Stations ⁷
Real-time Passenger Info	No	No	No	Yes	Yes
Route Number Designations	1-399	400-599	600-699	700-799	900-910

Note: It is recognized that strict adherence to a stop spacing standard may not be possible in all cases due to street geography or facility design. For example, on the Silver Line, the distance between stations on the freeways is greater than the desired minimum.

⁶Only the Metro Orange Line has off-board fare collection at this point. The Metro Silver Line currently only accepts fares through the fare box on board.

⁷Metro Silver Line Service has a section of on-street boarding and alighting in downtown Los Angeles.

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2.5 Alternative Service Delivery Options

Alternative service delivery options are services not directly operated by Metro, including contract services, municipal operators, Local Return Operators, van service, taxicabs, flexible destination operations, and scrip programs. These transportation options may be viable alternatives and can complement traditional transit service. Metro is considering working with ride-sourcing service providers (e.g. Lyft and Uber) to potentially provide additional first-mile and last-mile service options. In addition, Access Services provides mandatory ADA complimentary paratransit services to individuals whose disabilities prevent them from using fixed route transit services.

2.6 Facilities

Transit services are supported by facilities including bus stops, transit centers and stations. These locations are often the first and last points of contact with the passenger. The PRC considered these facilities to be an essential component of transit infrastructure that direct passengers to existing transit services, provide a safe and comfortable environment in which to wait for service, and facilitate safe and efficient transfers between services. Given the importance of transit facilities, it is vital that transit routes and schedules are developed with consideration for the quality, appropriateness, and availability of facilities.

Bus stops are locations along the route of a bus line where passengers safely wait to board or alight from a bus in service. Bus stops consist of route line number, destination and service qualification signage, curb markings or parking restriction signage. Stops may include passenger amenities such as shelters, benches, telephones, trash receptacles, lighting, and information displays installed by the appropriate municipality. Most bus stops are located along the curb of a street, while others are at offsite facilities such as transit centers or rail stations that may be owned and maintained by the local municipality or by Metro.

Transit stations are stops along a fixed guideway with features, such as loading platforms, TVMs for fare pre-payment, shelters, benches, lighting, information displays, trash receptacles, bike racks and lockers, and emergency call boxes. Many are located adjacent to Park & Ride lots and passenger pick-up/drop off areas.

Transit centers are high volume transfer points for multiple transit services and layover spaces for end-of-line bus storage and turn around. Features include passenger loading and alighting areas, benches, shelters, lighting, information displays, bicycle racks and lockers, trash receptacles, and bus layover bays.

On-street bus layover zones are designated stopover points for either a bus at or near the end of the line. They may or may not allow for passenger boarding and alighting. Bus terminals are major offsite layover areas for multiple bus lines and may or may not allow for passenger boarding and alighting.



El Monte Station

Locating bus facilities (other than on-street stops) in heavily congested or urbanized areas increases the burden on the transit operator to find layover spaces for buses and operator restrooms. At times, the extension of a line to a specific terminal may prove uneconomical and at the very least add costs to an already budget constrained operation.

Cost and minimization of passenger disruptions are significant concerns when locating facilities for bus operations. The PRC recommended that Metro Operations continue to evaluate routes and layovers to reduce costs and improve the efficiency of the operation. As a key internal stakeholder in the environmental planning process, reviews and comments, the Service Development Department should be involved early on in the analysis of alternatives to and the development of mitigation measures to ensure adequate accommodations are incorporated to foster connectivity of future projects.

Capital costs of new support facilities is an important determinant; but more significant is the added operating cost that may be incurred due to the lack of adequate facilities. The PRC strongly recommended that Metro require the calculation of the additional operating cost that will be incurred due to inadequate bus facilities and layover space as new rail stations and transit facilities are designed.

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SECTION 3: SERVICE DESIGN GUIDELINES

The PRC's policy guidance states that Metro's transit network should be well integrated, coordinated, and designed to be simple and user-friendly to increase trip making. To ensure an integrated and not duplicative system, Metro Rail, Metro Rapid, and other exclusive guideway services (e.g. Metro Orange Line and Metro Silver Line) should serve as the backbone of the transit system, fed and complemented by a regional bus network of key travel corridors that provide high-frequency service for easy transfers. Less-frequent localized services should augment the regional network to provide geographic coverage.

For network simplicity and to create a more intuitive system, closely-spaced services should be consolidated into fewer, more frequent services at a half-mile to one mile route spacing. For ease of use, transfers should be as seamless as possible by providing high frequency routes on the regional network, timed transfers for less frequent services, and consolidated bus stops at the same intersection.

Finally, since the regional transit network consists of more than 40 fixed route operators and many more local return transit services, coordination of services and alignment of schedules should be a high priority. Coordinated planning and scheduling between Metro, Muni, Local Return, and Metrolink operations are essential towards achieving this service integration.

3.1 Metro Service Councils

Metro decentralized its bus operations in 2002, creating five localized service areas each overseen by a Governance Council (Figure 3.1). In 2010, Metro restructured and re-established a centralized bus controlled operation to include the service planning and scheduling function, while maintaining the role and responsibility of the Councils to help coordinate service changes. Metro restructured the roles and responsibilities of the Governance Councils, now referred to as Metro Service Councils. These community-based councils offer:

- **Greater Community Involvement:** Regionalized outreach gives residents more opportunities for direct input into service issues in their communities.
- **Improved Service:** Local service evaluation to better understand passenger needs and recommend the appropriate response.
- **Sub-Regional Perspective:** Advise and approve the planning and implementation of service changes within their area; call and conduct public hearings; evaluate Metro bus programs related to their service area; review and approve proposed service changes; and, make policy recommendations to the Metro Board.

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Figure 3.1 Metro Service Council Areas

3.2 Service Design

A. Service Type Determination

Metro operates a Local, Limited, and Rapid bus grid network system overlaid by services, such as Rail and Express bus services, and supported by shuttle bus feeder/community services. Determining the most appropriate transit service in a corridor depends on a number of factors such as level of demand, resource availability, site or corridor characteristics, environmental considerations, and community acceptance. Table 3.1 shows desirable characteristics considered during the initial review of proposals to upgrade existing operations. The demand thresholds include the combined ridership levels for all services operating in the corridor.

Table 3.1

Service Type Determination⁸

Service Type	Corridor	Optimal Characteristics
Heavy Rail (Subway)	Operate 100% within an exclusive right of way.	- 2,500 boardings per route mile or more than 50,000 boardings per day. - Ability to construct a fully grade-separated facility.
Light Rail	Operate in mixed flow traffic or an exclusive right of way.	- 1,000 boardings per route mile or more than 25,000 boardings per day. - Ability to construct a guideway within or adjacent to the corridor.
Express Routes	Operate in mixed flow traffic in along either an HOV or HOT Lane and may operate a segment of their route on local streets.	300 or more boardings during peak-hour and in peak direction of travel.
BRT and Rapid	Operated using 40', 45' or 60' buses. - Metro Orange Line (BRT) operates on a fixed guideway. - Metro Rapid Lines operate in exclusive bus lanes or mixed flow traffic on local streets with signal priority.	- 300 or more boardings during peak-hour and in peak direction of travel. - Daily average of more than 500 boardings per route mile or more than 10,000 total daily boardings. - Ability to implement operating speed improvements in the corridor.
Local, Limited, and Shuttle Routes	Operate in mixed flow traffic on local streets by 32', 40', 45', or 60' buses.	- 80 or more passengers during peak-hour and in a single direction of travel. - Total daily boardings greater than 2,000.

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⁸Capacity limits adapted from TCRP, Research Results Digest, November 1999—Number 35, Highlight of Large Transit Capacity and Quality of Service Manual, Figure 1 Achievable Capacity (Peak direction passengers/hour)

B. Physical Routing Guidelines

Metro directly operated service primarily operates three types of buses: a standard 40-foot bus, a 45-foot bus, and a 60-foot “articulated” bus. To ensure that buses can adequately navigate route alignments and serve bus stops, Metro established the following standards:

– **Transit Centers /Bus Terminals**

- Layover zones should be designed to accommodate various sizes of buses (40-foot, 45-foot, and 60-foot).
- Re-striping of layover zones should be implemented as-needed based on the needs and bus sizes scheduled.
- Routes should be scheduled in such a way that the amount of layover space can be accommodated. Layover zones should be placed as close as possible to the route terminal. Where not accommodated by the design, the added operating cost to serve the location will be computed and made part of the decision-making process for bus/rail interface.

– **Minimum turning radius clearance** required for each type size bus movement

- 50 feet for 40-foot buses (Figure 3.2)
- 44 feet for 60-foot articulated buses (Figure 3.3)
- 47.5 feet for 45-foot buses (Figure 3.4)

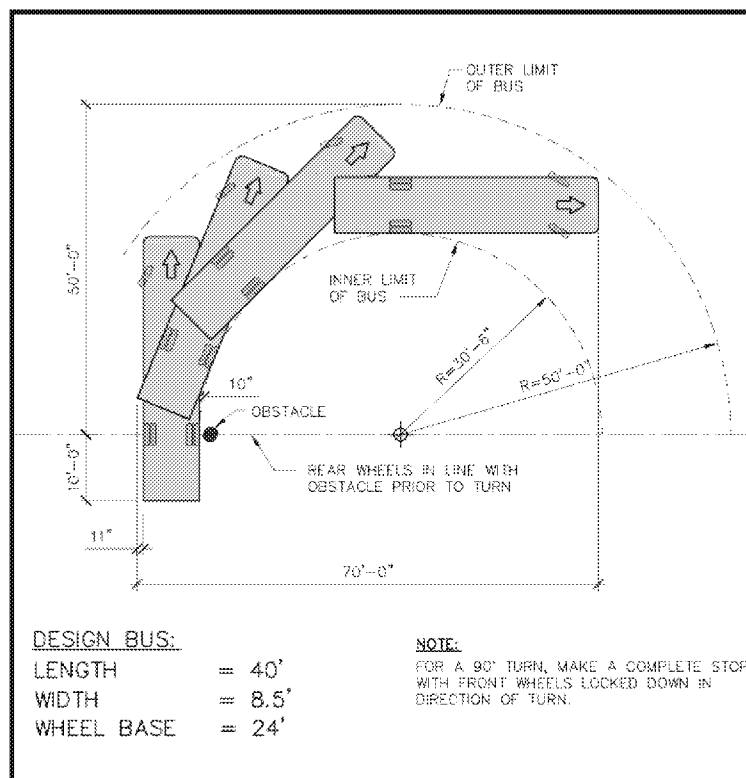


Figure 3.2 40-foot bus turning radius

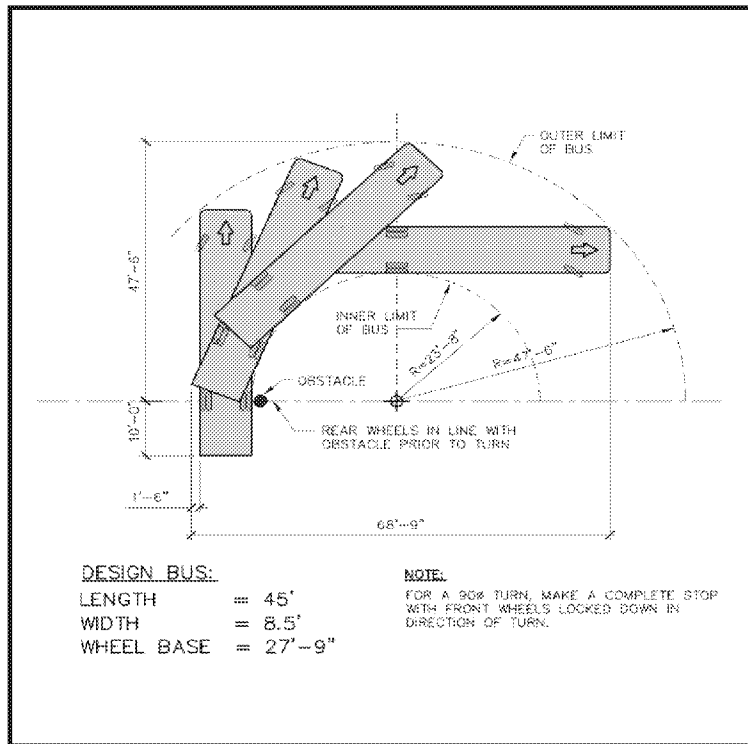


Figure 3.3 45-foot bus turning radius

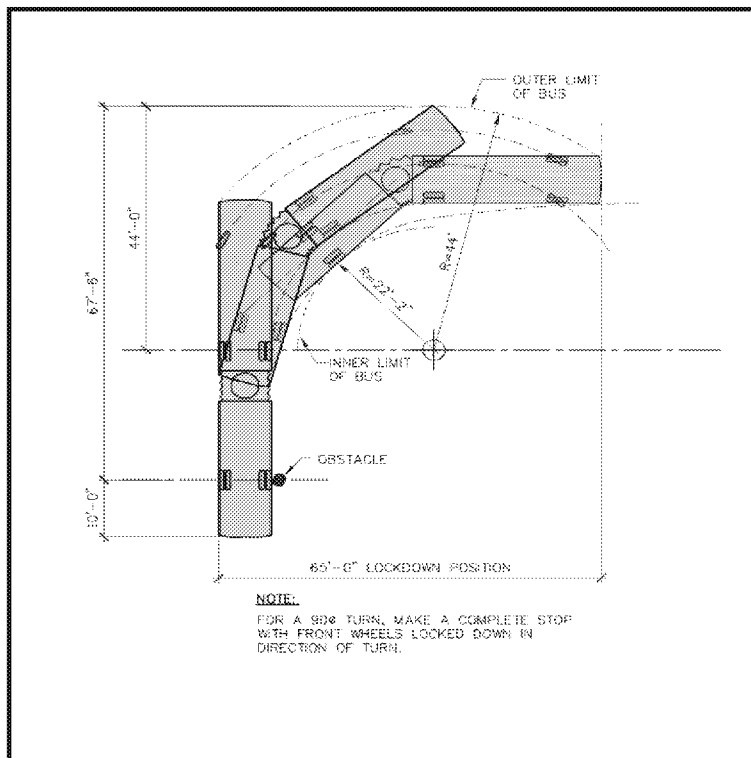


Figure 3.4 Articulated 60-foot bus turning radius

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- **Desired street lane widths** for bus operations should be 12 feet or more.

- **Optimal Bus Stop Curb Lengths and Zone**

40-foot buses should at minimum:

- Far-side – 90 feet
- Near-side – 100 feet
- Mid-block – 150 feet

For two 40-foot buses servicing a stop simultaneously, add 50 feet. Additional bus stop curb length may be needed for 45-foot buses.

60-foot bus should at a minimum:

- Far-side and mid-block – 120 feet
- Near-side – 170 feet

For two 60-foot buses servicing a stop simultaneously, add 70 feet.

- **Bus Layover Zone** general space requirements based on frequency between scheduled trips:

- One Space – 15 minutes
- Two Spaces – 12 minutes
- Four spaces – 6 minutes

Appendix D provides a number of renderings illustrating a typical bus stop/zone design and offers guideline for near-side, far-side, and mid-block locations. TCRP Report 19 “Guidelines for the Location and Design of Bus Stops” (1996) provides a more detailed discussion.

C. Bus & Rail Service Guidelines

- **Corridor/Route Duplication** refer to a collection of parallel routes serving several common destinations. If the route spacing is such that patrons could walk to one or the other within the same amount of time and distance, then relatively speaking these routes can be considered duplicative services.
- **Bus Route Duplication** occurs when two or more bus routes operate on the same alignment by one or more carriers in a transit corridor.
- **Rail Line Duplication** occurs when an Express or Rapid bus service operate a significant segment parallel to a rail line. This standard does not apply to Local bus service. While service duplication should be minimized, exceptions apply such as Metro Rapid bus corridors that support an underlying local route, on approaches to business districts, major terminals, and transit centers, or if serving key destinations along a corridor from several directions.

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- **Headway/Frequency** refers to the interval of time, expressed in minutes, between consecutive trips. Headways are based on policy and demand. Frequency is driven by the amount of time separation between scheduled trips, otherwise known as the headway, and refers to how often the arrival of a trip occurs in a given period. For example, if the headway of a line is 10 minutes, its frequency is six trips every hour. Service frequencies should be set to provide sufficient capacity to adequately meet the demand and ensure that a reasonable and attractive level of service is provided throughout the day. Section 4.1 discusses Metro’s Headway/Frequency standard and policy.
 - **Limited-Stop Bus Service** makes significantly fewer stops than Local service. The key design objective is to operate at a minimum of 10% faster than Local service. Limited service will be considered in corridors where the demand requires 10-minute headways or less on the Local line prior to implementation of a Limited-stop service.
 - **Bus & Rail Passenger Load Ratio** is the average ratio of passengers on-board to seats available commonly measured over a one-hour period. A passenger load ratio standard indicates what proper headway should be scheduled. Section 4.1 discusses Metro’s Load Ratio standard and policy.
 - **Network Route Spacing** refers to the average distance between two or more parallel bus and/or rail lines. It is generally accepted that patrons are willing to walk up to one quarter mile to a bus stop. In general, bus routes operating parallel to each other in an urban area should be spaced a half-mile apart from one another and bus routes operating parallel to rail should be spaced a half-mile apart on either side of a rail route. Bus routes operating parallel in a suburban area should be spaced no more than one mile apart from each other, and bus routes operating in low density or underdeveloped areas should be operated where needed in such a way that it is cost-effective. When possible, alternate delivery methods should be considered.
 - **Bus & Rail Route Alignment** should be direct for network simplicity and to maximize average speed and minimize travel time. In general there should be no more than two branches per trunk-line route. Rail alignment is decided during the design phase of a fixed guideway/right-of-way and is beyond the scope of the TSP.
 - **Bus Route Deviation** also referred to as “out of direction movement,” is when a route is realigned to operate in close proximity of a new activity center such as a rail station or transit center. Route deviation should only be considered if the diversion time in one direction is 5 minutes or less, and there is a net travel time benefit for riders who are connecting to other services.
 - **Bus Route Length** should be as short as possible to reduce a vehicle’s exposure to events that may delay service (e.g. accidents, road construction, or poor weather conditions) and to maintain scheduled travel times to maximize on-time performance.

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- **Bus & Rail Span of Service** refers to the hours that service is available on a given day and defines the minimum period of time that service should operate at any point in the system (Table 3.2). A key factor in determining the span of service on individual lines is based upon system connectivity. This provides customers with the confidence that direct and connecting service will be provided.

Some of the criteria used to determine the span of service on a bus route include:

- Existing ridership and productivity levels
- Span of service on connecting and alternative services with expanded service
- Resource availability
- Hours of operation of major job sites or activity centers along the alignment

Table 3.2

Standard Span of Service by Service Type

Service Type	Weekday	Weekends
Heavy Rail	4:30am – 1:30am	4:30am – 2:30am
Light Rail	4:00am – 2:00am	4:00am – 2:00am
Metro Liner	4:00am – 2:00am	4:00am – 2:00pm
Metro Express	Varies by line No Typical Span	Varies by line No Typical Span
Metro Rapid	5:00am – 9:00pm	6:00am – 8:00pm
Metro Local	5:00am – 11:00pm	6:00am – 9:00pm
Metro Rail Feeder/Shuttle	5:00am – 9:00pm	6:00am – 9:00pm

- **Transfers** occur when passengers change from one transit unit to another (bus or rail) at a common stop location such as an intersection, station, or transit center. Metro’s goal is that transfers should be seamless and minimize wait times as much as possible. Metro accomplishes this through timed transfers and positive transfers.

- **Timed Transfers** are when wait times are built into the schedule of a route to provide convenient connections between two routes for passengers who wish to transfer at a common stop location. In these instances it is preferable that wait times be built into the schedule of a low frequency route with headways greater than 20 minutes and owl routes that operate every 30 to 60 minutes.

- **Positive Transfers** are when one route is scheduled to arrive 2-5 minutes before or after another route at a common stop location to enhance connections and reduce wait times for passengers who wish to transfer from line to another, such as connections between bus and rail.

Metro will work with other municipal transit operators to better coordinate services and schedules to minimize transfer impacts.

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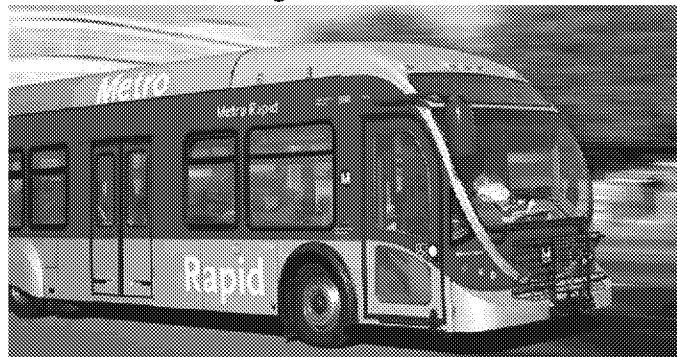
D. Bus Stop/Station Stop Location

Bus stops and station stops allow for boarding and alighting of passengers and their location should balance safe and convenient rider access with pedestrian safety. Their locations should support efficient transfer movements, minimizing walking distances, unnecessary crosswalk movements, and preferably be located at a signalized crosswalk to prevent potential jaywalking violations. Bus stops are generally located adjacent to a bus/rail station or within a short walk to medical facilities, schools, major retail malls, office buildings, multi-unit apartments, or other major activity centers. These stops provide access to the transit system for uses that generally attract a large number of transit riders. Hospitals and schools have high priority when considering new bus stop locations and/or when relocating existing bus stops.

Bus/Rail station locations are determined during the design phase of a fixed guideway/right-of-way. There is a set of criteria associated with station location, but this is beyond the scope of this TSP. Generally, stations are located at major transfer points with bus or rail and provide access to major activity centers. No standard type of stop can be recommended for all locations, as each intersection has its own unique characteristics. An inventory of land uses within a quarter-mile corridor of the road under consideration should be taken, particularly uses that serve as major trip producers and attractors. The proper location of a transit stop requires on-site investigation of the stop(s) under consideration and must be concurred by the municipality in which the stop is located in.

Whether a bus stop should be located at the *near-side* of the intersection, the *far-side* of the intersection or at “*mid-block*” has been a source of debate. In general, far-side stops are preferable, particularly at signalized intersections; however, other types of stops may be justified in certain situations. There are advantages and disadvantages to each location (Table 3.3). TCRP Report 19 “Guidelines for the Location and Design of Bus Stops” (1996) provides a more detailed discussion.

For Rapid Bus stop locations, the current warrants recommend that the stops be placed far-side in order to take advantage of the Transit Priority System for signals. The PRC recommends further that, where possible, Rapid and Local stops should be placed on the same side of the street to avoid passengers having to choose which line to take and then having to attempt to cross the street to gain access to the first service to arrive.



Metro Rapid Bus

Table 3.3

Comparative Analysis of Bus Stop Locations

Stop Type	Advantages	Disadvantages
Near-Side	<ul style="list-style-type: none"> ▪ Minimizes interference when traffic is heavy on the far side of the intersection ▪ Passengers access buses closest to crosswalk ▪ Intersection available to assist in pulling away from curb ▪ Buses can service passengers while stopped at a red light ▪ Provides driver with opportunity to look for oncoming traffic including other buses with potential passengers 	<ul style="list-style-type: none"> ▪ Conflicts with right turning vehicles are increased ▪ Stopped buses may obscure curbside traffic control devices and crossing pedestrians ▪ Sight distance is obscured for crossing vehicles stopped to the right of the bus. ▪ The through lane may be blocked during peak periods by queuing buses ▪ Increases sight distance problems for crossing pedestrians
Far-Side	<ul style="list-style-type: none"> ▪ Minimizes conflicts between right turning vehicles ▪ Provides additional right turn capacity by making curb lane available for traffic ▪ Minimizes sight distance problems on approaches to intersection ▪ Encourages pedestrians to cross behind the bus ▪ Requires shorter deceleration distances for buses ▪ Gaps in traffic flow are created for buses re-entering the flow of traffic at signalized intersections <p>Allows bus routes that operate signal priority to take advantage this technology at signalized intersections.</p>	<ul style="list-style-type: none"> ▪ Intersections may be blocked during peak periods by queuing buses ▪ Sight distance may be obscured for crossing vehicles ▪ Increases sight distance problems for crossing pedestrians ▪ May increase number of rear-end accidents since drivers do not expect buses to stop again after stopping at a red light
Mid-Block	<ul style="list-style-type: none"> ▪ Minimizes sight distance problems for vehicles and pedestrians ▪ Passenger waiting areas experience less pedestrian congestion 	<ul style="list-style-type: none"> ▪ Requires additional distance for no-parking restrictions ▪ Encourages patrons to cross street at mid-block (jaywalking) ▪ Increases walking distance for patrons crossing at intersections and for transferring passengers

Source: FTA webpage (http://www.fta.dot.gov/12351_4361.html)

There are instances when two or more bus routes operate along the same corridor (e.g. Rapid bus line augmented with an underlying Local bus line). In these cases, it is desirable that stops be consolidated to avoid unnecessary crosswalk movements and minimize confusion as to which stop riders should wait to catch their bus. However, stops cannot be consolidated in the following instances:

- Unsafe right turn movements
- Objections from businesses adjacent to stops

-
- Loading zones (business & passenger)
 - Jurisdiction refusal to allow extending current stop zone
 - Lack of available space
 - **Bus Stop/Station Accessibility:** All stops and stations should be fully accessible in accordance with the 1990 Americans with Disabilities Act. For example, there should be no obstructions preventing the boarding and alighting of patrons who use a wheelchair or other assistive mobility devices. In addition, pathways to and from a stop or station should be unobstructed. If obstructions do exist, every effort must be made to mitigate the issue(s) with the respective municipalities. In the case of bus stops, they can either be moved to a new location on a permanent basis or temporary basis depending on situations, such as during construction.

E. Bus Stop/Station Spacing

Stop/Station spacing refers to the average distance between consecutive stops/stations along an entire bus/rail route. Stop/Station spacing are established based on the goals and guidelines each service type is designed to achieve as discussed below and summarized in Table 3.4.

The standard is expressed as the maximum average stop/station spacing in miles by type of service and is not to be exceeded by at least 90% of all routes operated. The following establishes Metro's maximum average stop/station spacing by mode:

- **Heavy/Light Rail Line** station spacing is even greater than bus stop/station spacing to achieve the highest speed among the various modes and service type. Rail station location is determined during the design phase. Ideally the average rail station spacing should be no greater than 1.50 miles.
- **BRT and Express Bus Routes** achieve the highest bus speeds through even greater stop spacing than Rapid and Limited routes. To ensure these services provide access to major activity centers and transfer points, the average stop/station spacing should be no greater than 1.25 miles. (There may be exceptions to this due to geography or existing facility design. See Stop Spacing discussion under Section 2.4).
- **Rapid and Limited Bus Routes** operate on the most heavily traveled corridors. Both services achieve their speed advantage largely through serving fewer stops than Local bus operation. However, to ensure these services provide access to a significant portion of patrons within the corridor, the average stop spacing for Rapid routes should be no greater than 0.80 mile and no greater than 0.60 for Limited routes.
- **Local Bus and Shuttle Routes** primarily operate on city streets and secondary streets respectively. Both route types are designed to provide service closer to a passenger's destination and reduce walking times. Therefore, both Local and Shuttle routes average stop spacing should be no greater than 0.25 mile for passenger convenience.

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Decisions regarding bus stop spacing and location call for careful analysis of passenger service requirements, the safety of passengers, operators, equipment, the service type provided, and the interaction of stopped buses with general traffic flow. Achieving a balance of convenience to both the transit passenger and the auto user is a prime objective. In addition, bus stop spacing should be related to ridership density. Stops should be closer together in major commercial districts and farther apart in outlying areas.

Table 3.4

Maximum Avg. Stop/Station Spacing

Service Type	Stop/Station Spacing
Heavy Rail	1.50
Light Rail	1.50
BRT	1.25
Rapid	0.80
Express	1.25
Limited	0.60
Local	0.25
Shuttle	0.25

F. Bus Lanes

A bus lane is an exclusive lane used by transit on urban streets along a roadway through widening or dedication of one or more existing general traffic or parking lanes for transit use. These lanes can be designated for transit use during peak periods only or all day. These lanes typically allow use by general traffic for right turn movements, bicycles, parking, and local access to and from driveways. Bus lanes are most effective in those areas where there are very high bus volumes or passenger volumes and where operational efficiencies can be achieved. Bus lanes should be a minimum of 17 feet wide.

G. High Capacity Bus

Metro operates two high-capacity vehicle types: 45-foot buses with 46 seats and articulated 60-foot buses with 57 seats. Ideally, high-capacity vehicles should primarily be operated on high-volume trunk service routes such as Line 720 (Wilshire Blvd.) and Lines 204 and 754 (Vermont Blvd.), which currently operate 60-foot articulated buses.

One advantage to their deployment is the opportunity to reduce vehicle requirements and service hours; however, their deployment should not increase service intervals to the point where riders notice degradation in service quality. For this reason, bus lines with a peak headway of five minutes or less (frequency of 12 trips or more an hour) are ideal candidates for this type of vehicle. In evaluating services for higher capacity vehicles, other factors must be considered including facility compatibility, street design, and potential impacts to services where schedules have been interlined.

H. Bus/Rail Integration

As the Metro Rail system expands, adjustments are made to the bus system to improve access to rail stations, take advantage of new transfer facilities, and reduce bus and rail service duplication. The following guidelines provide direction to routing and scheduling changes that will be necessary as the Metro Rail system is expanded:

Discontinuation of Parallel Limited and Express Service

Competing Limited and Express services that parallel the rail corridor will be discontinued when duplication exists.

Bus Route Deviation

Bus routes that run parallel to a rail line may be diverted to a station when:

- Walk time from the nearest station is greater than 3 minutes;
- Diversion time in one direction is 5 minutes or less; and
- Net travel time benefit for connecting passengers exceeds increased travel for through travel.

Intersecting bus lines or ones that travel in a perpendicular direction to a rail line will be diverted to serve the closest rail station when:

- Diversion time in one direction is 5 minutes or less
- Net travel time benefit for connections and through travel

Extend Terminating Lines

Bus routes that end within one mile of a rail station will be extended to terminate at the station. Routes that terminate at distances greater than one mile may be extended if the rerouting will create a valuable link to the rail system or will result in a reduction in travel time for a significant number of riders.

New Bus Routes

New rail feeder service will be considered as part of the service change process if a need is demonstrated and if funding is available.

Scheduling Bus Interface

During peak travel periods, bus arrival and departure times should be governed by the rail arrival and departure times when predominant movement is from bus to rail.

During off-peak times, bus routes with frequencies of 20 minutes or greater ending at a rail station should be scheduled to arrive 2-5 minutes before the rail departure time.

When the predominant movement is from rail to bus, terminal buses should be scheduled to depart 2-5 minutes after the scheduled rail arrival time.

I. School Trippers

School trippers are extra service operated to protect against overcrowding on bus routes serving schools. Metro's policy on school trippers is based on FTA regulations (49 CFR Part 605). These regulations are directed at protecting the private sector against unfair competition and ensuring that FTA funding is focused on providing services that meet the needs of the "general public."

School tripper service may be operated if it meets the following criteria:

- There is sufficient demand to warrant the operation of a tripper;
- There are sufficient resources to operate a tripper;
- The school tripper will not result in a significant increase in travel time for regular customers; and
- The school tripper is operated as part of the regularly scheduled public transportation service.

School tripper service must meet the following requirements:

- All school trippers must fully comply with established policies and procedures;
- All regularly scheduled school trippers must be published on public timetables;
- All locations where trippers board or alight passengers, including the bus stops at deviated routes, must be marked with Metro signage including the bus line numbers servicing the stop;
- School tripper changes must be provided to the general public by a service change notice or on the Metro website at www.metro.net; and
- Requests for new school trippers or modifications to existing school trippers will be considered when a notice is given at least two weeks in advance providing ample time to complete an appropriate analysis of the request and to allow appropriate notification of changes.

School Tripper Service Change Procedures are listed in Appendix E.

J. Special Event Service

Special event services are bus routes designed to take passengers to a specific venue and are not part of the regularly scheduled operation. Metro will provide service under contract to other entities only if the provision of these services do not interfere with Metro's ability to meet its regularly scheduled service obligations and fits within the scope of the agency's regular operation in terms of route structure, fares and span of service. Special event services will be provided on a full cost recovery basis and in conformance with the agency's charter bus policy.

K. Charter Bus Policy

Charter service is the use of buses, vans or facilities (rail system) to provide a group of persons under a single contract, at a fixed charge, with the exclusive use of the vehicle or

service to travel together under an itinerary either specified in advance or modified after having left the place of origin. Generally, for service not to be considered charter, it must meet the following tests:

- Be available to the general public;
- Operate within the system’s normal scope (existing routings, fit within normal hours of operation and established fare structure);
- Provide a published timetable; and
- Customers must pay their own fare.

As a grantee of Federal funds, Metro is prohibited from using its federally-funded equipment and facilities to provide charter service except on an incidental basis and when one or more of the applicable exceptions below apply:

- Charter service shall be incidental to the mass transportation service and shall be provided only during times of the day when vehicles are not needed for regularly scheduled service.
- Charter service will only be considered when one of the following exceptions apply:
 - There are no willing or able private charter operators;
 - For special events the private operators are not capable of providing the service;
 - When there is a formal agreement regarding the provision of charter services between the recipient and all private charter operators who have been identified to be willing and able; and
 - For government or certain non-profit organizations, if the trip involves a significant number of handicapped persons, or if the organization is a qualified social service agency, or if it receives public welfare assistance funds whose implementation may require transportation services.
- All requests for Charter Service must be approved by the Chief Executive Officer and may require a waiver from the Federal Transit Administration. Petitions for a waiver should be requested in writing 90 days in advance of the event whenever possible.
- The rates for charter service shall equal or exceed the annual fully allocated cost, including depreciation, of providing charter bus operations, and Metro shall deduct the mileage and hours from the useful life of the buses.
- The operation of charter service also must comply with relevant state laws, including Section 30630.5 of the California Public Utilities Code.

L. Vehicle Assignments

Metro’s goal is to ensure a consistent basis for assigning vehicles to facilities meets operating needs at a minimal cost and improves quality of service. This policy ensures there is a

consistent basis for assigning vehicles to facilities that meet operating needs at a minimal cost and improves quality of service.

Buses

- Buses will be assigned to individual facilities on the basis of vehicle size requirements for lines supported by each facility.

Light Rail

- Light Rail cars will be assigned to individual lines on the basis of compatibility of vehicle controllers with each line's signal system.
- The number of vehicle types/manufacturers will be kept to no more than two at any facility to minimize parts storage and maximize maintenance expertise.

Heavy Rail

- Assignment policy is not applicable to Heavy Rail. Red and Purple Lines operate out of the same division and both are operated by the same vehicle type.

3.3 Customer Information & Amenities

Providing customer information instructs both regular riders and infrequent riders on how to use transit as a viable mode of transportation to and from their destinations. The PRC determined that clear, concise, and timely information is an important adjunct to service quality, particularly when bus and rail services are not operating as planned. Amenities aid in the comfort and security of riders.

Customer Information

Passengers need to know how to use transit: where to go to access it, where to alight to access their destination, whether transfers are required, and when transit services are scheduled to depart and arrive. Regular and even infrequent users particularly require this information about specific routes when they need to travel to a location they rarely visit or that is new to them. Information must be provided in accessible formats. Metro provides customer trip planning and help information via telephone, through in-person customer service representatives, on-board announcements, mobile device applications and text/SMS messaging, by mail, online at the metro.net website, and by email.

- **At Transit Infrastructures**, such as shelters, signs directing motorists to Park & Ride lots, and bus stop signs that indicate the presence of service to people not currently using transit.
- **Audible Announcements** at bus stops, rail stations and on board vehicles to assist not only passengers with visual impairments but also passengers unfamiliar with the route or area.
- **Online Information** available 24-hours to anyone with Internet access such as:

-
- NEXTRIP's next bus arrival (detour notices should be posted on this service, Metro's website, as well as other social media outlets)
 - Google Transit
 - Route Maps & Timetables, Fare Information, and Trip Planner
 - Specialized Guides (Bikes, Riders with Disabilities, Safety & Security)
 - Commuting Information (Carpools, Vanpools, School Pools, and Employer Programs)
 - News and Media Information
 - Latest Projects and Programs
 - Contact Information
 - Special Event Information
 - Social Media Accounts
- **Next Bus or Train Real-Time Information**, both audible and visual, to reassure when the next scheduled vehicle will arrive. This should also include information on detours. Next Bus is only one of many service applications now available for the smart-phone or tablet user of social media.
 - **Printed and Distributed Information**, such as timetables, maps, service change notices, rider newsletters, etc., preferably available at a number of locations.
 - **Posted Information**, such as system maps, bus cubes posted at stops, stations, and on-board transit vehicles.
 - **Route Numbering Convention** at stops and transit vehicle head signs to assist passengers to quickly identify what stops to wait at and what transit vehicle to board related to printed and posted information. See Appendix C.
 - **Way-finding** is the process of communicating information to support our patrons with the ability to navigate through the use of signage, system/route maps, kiosks, bus cubes, directions, etc. so they can easily determine where they are, where they want to go, and how to get there.
 - **Visual Displays** to assist passengers with hearing impairments and to supplement on-board announcements that may be muffled by other noise.

Customer Amenities

Customer amenities are those elements provided at a transit stops, transit centers, and station stops to enhance comfort, convenience, and security. Metro will provide customer amenities where applicable and resources are available. In some instances, Metro will coordinate with municipalities to provide the appropriate amenities. Amenities include items such as shelters, benches, vending machines, trash receptacles, lighting, restrooms, and telephones.

- **Benches** provide comfort for waiting passengers, help identify the stop or station, and provide an affordable alternative to shelters.
- **Elevator/Escalators** provide accessibility for those who otherwise cannot use stairs to elevated or lowered station stops.
- **Lighting** increases visibility, security, and discourages misuse of bus stops when transit operations are not in service.
- **Public Restrooms** may be provided at major transit centers and maintained for public safety and convenience.
- **Shelters** provide comfort for waiting passengers, protection from climate conditions, and help identify the stop or station. Metro does not own or install benches and shelters, but will coordinate with local jurisdictions on their placement where appropriate.
- **Telephones/Intercoms** provide access to transit information and emergency services.
- **Trash receptacles** provide a place to discard trash and contribute to keeping bus stops and surroundings clean. Trash receptacles are placed and maintained by individual municipalities at bus stop locations.

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Rail Stations & Major Off-Street Bus Facilities

Metro is committed to providing a minimum set of passenger amenities at all rail stations and major Metro-owned off-street bus facilities that allow for passenger boarding as summarized in Table 3.5. This standard ensures consistency across the system at these locations.



Patsaouras Plaza Transit Facility

Table 3.5

Passenger Amenities

Amenity	Service Type	Allocation
Shelters:	Heavy Rail:	n/a
	Light Rail:	At least 80 linear ft. per bay
	Bus:	At least 6 linear ft. per bay
Seating:	Heavy Rail:	At least 12 seats
	Light Rail:	At least 10 seats
	Bus:	At least 3 seats per bay
Info Displays:	Heavy Rail:	At least 12
	Light Rail:	At least 10
	Bus:	At least 3
LED Displays:	Heavy Rail:	At least 8 arrival/departure screens
	Light Rail:	n/a
	Bus:	n/a
TVMs:	Heavy Rail:	At least 2
	Light Rail:	At least 2
	Bus:	n/a
Elevators:	Heavy Rail:	At least 2
	Light Rail:	At least 1 for elevated/underground
	Bus:	At least 1 for multi-level terminals
Escalators:	Heavy Rail:	At least 4 (2 Up/2 Down)
	Light Rail:	n/a
	Bus:	n/a
Trash receptacles:	Heavy Rail:	At least 6
	Light Rail:	At least 2
	Bus:	At least 1 per 3 bays/2 per facility

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When transit service is not provided near one’s origin, driving to a Park & Ride lot or riding a bicycle to transit may be viable alternatives. Park & Ride lots and bicycle storage are especially important amenities for transit riders.

- **Park & Ride/Station Parking Facilities** provide a place for transit riders to park their cars before boarding a bus or train. Park & Ride facilities are usually provided at station stops or transit centers, such as the Metro El Monte Station, Harbor Gateway Transit Center (formerly Artesia Transit Center), and at various rail stations. Park & Ride lots also can be found in suburbs to serve as a staging area for commuter riders.
- **Bicycle Storage** may be provided at transit stations where demand exists and space allows, and on transit vehicles. Bicycle racks and lockers may be provided at transit

center and stations. On transit vehicles, bicycles may be transported on bus-mounted racks located in front of a bus or on board a rail car in designated spaces. Bike racks provide a simple, relatively low-cost approach and can hold a large number of bicycles in a relatively small space, but bicycles are subject to potential damage and theft. Enclosed bicycle lockers provide added protection from theft and from weather, but are more costly and require more space.



Bicycle Lockers at North Hollywood Red Line Station

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SECTION 4: SERVICE PERFORMANCE EVALUATION

Historically, Metro primarily used a Route Performance Index (RPI) to determine a route's performance using Office of Management and Budget's Annual Budget Projections (Section 4.2). Metro's RPI is still used to identify weak performing bus lines; however, in 2009, Metro developed a more comprehensive internal monitoring process that isolates and measures a set of attributes that better gauges a transit line's performance in its goal of providing high-quality transit services that are efficient and effective (Section 4.1). In September 2013, the Metro Board adopted a revised set of service standards and policies designed to improve the customer experience, which has been incorporated into this document.

4.1 Service Performance Indicators

In 2009, Metro introduced a comprehensive internal monitoring process that focuses on four core service attributes using ten performance indicators. Four of the ten performance indicators, specifically Accessibility, Headways, In-Service On-Time Performance (ISOTP), and Passenger Loading, were revised and adopted as service standards by the Metro Board in December 2011, replacing the corresponding four performance indicators approved in the 2011 TSP.

Metro's Service Planning & Scheduling Department provides quarterly analytical reports that measure these four core attributes: availability, quality, quantity, and effectiveness. Lines are analyzed according to their service type, nine specific time periods, and days of operation (weekday, Saturday, and Sunday). This analysis allows staff analysts to focus on the performance of a line by time period.

Availability

Two indicators are used to measure the extent to which transit service is available.

- **Accessibility:** Service is to be provided within one-quarter mile of 99% of Census tracts within Metro's service area having at least three households per acre and/or at least four jobs per acre. Fixed-route service provided by other operators may be used to meet this standard. This standard ensures the availability of fixed route service to virtually all residents of Metro's service area while limiting duplication of service by using services operated by others to achieve the standard.
- **Connectivity** states that direct transfers should be available for all Rapid-to-Rapid and Local-to-Local connections.

Quality

Quality is important in retaining existing customers and attracting new ones. Two indicators are used to measure quality:

- **In-Service On-Time Performance (ISOTP):** This standard ensures a high level of service reliability. On-time performance is defined as departing no more than one

minute early and five minutes late at all time-points along a route. Currently the ISOTP target is set at 80%. Ninety percent of lines should achieve this standard at least 90% of the time.

- **Customer Complaints** monitors the frequency of customer complaints per 100,000 boardings. The poorest 15% of bus lines in each service type receive added scrutiny.

Quantity

Quantity is important in establishing minimum service levels for any service operated as well as ensuring that demand is adequately served when higher volumes of patronage are achieved. Two performance indicators are used to determine if adequate service levels exist given the demand.

Headway/Frequency of Service: The headway standard provided for the maximum scheduled gap (in minutes) between trips in the peak direction of travel at the maximum load point of a line by time of day should not be exceeded for at least 90% of all hourly periods as summarized in Table 4.1.

Table 4.1

Maximum Headway by Service Type

Service Type	Peak	Off-Peak
Heavy Rail	10	20
Light Rail	12	20
BRT	12	30
Rapid	20	30
Express	60	60
Limited	30	60
Local	60	60
Shuttle	60	60

Bus & Rail Passenger Loading Standard: Passenger loading standards have been developed to ensure there is sufficient service capacity on Metro Bus and Rail service. The loading standard for bus is based on the maximum average ratio of passengers to available seating per vehicle size (i.e. 40-foot, 45-foot, and 60-foot buses). The loading standard for rail is based on the maximum average ratio of passengers per seat by service type (i.e. Heavy Rail and Light Rail). Table 4.2 summarizes load factors for other major operators and serves as a yardstick against which the standards used by Metro can be measured.

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Table 4.2

Peak Period Loading Standards: 40 Foot Bus

Property	Peak Loading Standard (Based on seats)	Off-Peak Standard (Based on seats)	Comments
Philadelphia (SEPTA)	1.59		Unspecified off-peak
Seattle (King County)	1.5	1.25	No trip can have standing load for 20 minutes or longer
Chicago (CTA)	1.3	1.0	
San Francisco (MUNI)	1.2	1.0	
Boston (MBTA)	1.4	1.0	
Washington, DC (WMATA)	1.2	1.0	
San Diego (MTS)	1.5	1.0	
Denver (RTD)	1.25	1.0	
New York City (NYCT)	1.5	1.40	
Dallas (DART)	1.5	1.0	

Source: 2015 Staff survey of properties

- **Bus Passenger Loading Standard** expresses the maximum average ratio of passengers to vehicle size and frequency by direction for a one-hour period should not be exceeded for at least 95% of all hourly periods. Metro revised its loading standards based on recommendation of the APTA Peer Review Committee and the PRC. The revised set of load factors considered frequency of service as well as seated capacity of a 40-foot, 45-foot, or 60-foot vehicle. The revised policy also accounted for differences between peak and non-peak operations. The rationale for this change was to recognize that a single load factor does not cover the full range of circumstances confronting a passenger. For example, on routes where the frequency of service is 60 minutes, accepting a load factor of 130% of a seated load at all times throughout the day means that the passenger may experience severe overcrowding or worse, be unable to board the bus and be forced to wait another hour for service⁹.
- **Computation of the Average Daily** load is important in determining the frequency of service. The headway is dependent upon the size of the vehicle and the load factor (standees based on a ratio of passengers to available seats) as well as the maximum peak load that has to be satisfied. Metro determines the maximum peak load by summarizing data for the days of service (Weekday, Sat., or Sun.) and then computes both the average and arithmetic mode for a given period. For lines with low levels of service, the higher value is then selected for the scheduling computation. All other services will use the arithmetic mode unless the values are too diverse, in which case

⁹ The 2011 Transit Service Policy, as adopted by the Metro Board in January 2011, increased the Load Factor from 1.2 to 1.3. At the end of the Consent Decree in 2010, load factors were changed from 1.0 to 1.2. Even at that, Metro Load Factors were below other North American operators as shown in Table 4.2. The standards have been modified in the 2016 Policy document to be more in line with the accepted standards exemplified by other large metropolitan operators.

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the low service line approach would be used. The arithmetic mode is used rather than the average so that the most common peak loads by time period can be used to determine minimum service levels required. Using the mean for all days of service has resulted in an undercount for some service. This is because all days are used to generate the average, including very low passenger demand days such as rain days, days with special events, semi-holidays and other events. Having staff determine which days to exclude for which bus lines could lead some to speculate that Metro is inappropriately selecting high or low ridership demand days. By using the mode average for all service days, this perception is avoided.

Table 4.3

Loading Standards with Approximate Passengers per Seat Equivalence

Weekday AM and PM Periods					Off-Peaks and Weekends				
Frequency Range in Minutes	Psgs. / Seat	Bus Types			Frequency Range in Minutes	Psgs. / Seat	Bus Types		
		40 ft.	45 ft.	60 ft.			40 ft.	45 ft.	60 ft.
		Average Peak Loads					Average Peak Loads		
1 - 10	1.40	56	65	80	1 - 10	1.30	52	60	74
11 -20	1.30	52	60	74	11 -20	1.25	50	58	71
21 - 40	1.20	48	55	68	21 - 40	1.10	44	51	63
41 -60	1.10	44	51	63	41 -60	1.00	40	46	57
60+	1.00	40	46	57	60+	0.75	30	35	43

Shaded area presents current load factor standard applicable at all times. This table replaces the all-day 130% standard with one that varies by peak / off-peak and schedule frequency.

- **Rail Passenger Loading Standard** expresses the maximum average ratio of passengers to seats by service type and by direction for one-hour period by time of day should not be exceeded for at least 95% of all hourly periods as summarized in Table 4.4.

Table 4.4

Passenger Loading Standards by Service Type

Service Type	Peak Psgs. / Seat	Off-Peak Psgs. / Seat	Seats per Rail Car	Peak Max. Psg. Onboard	Off-Peak Max. Psgs. on Board
Heavy Rail	2.30	1.60	54	124	86
Light rail	1.75	1.25	76	133	95

Effectiveness

Effectiveness measures are used to ensure that service is provided in the most cost-effective manner given scarce resources. Four performance indicators are used to measure effectiveness and are analyzed by service type and time of day.

- **Boardings per Service Hour** measure the level of passenger activity, or passenger turnover, during each hour of operation. The poorest 15% of bus lines in each service type are reviewed in detail.

- **Cost per Passenger Mile** measures the cost effectiveness of the service provided. The poorest 15% of bus lines in each service type are reviewed in detail.
- **Passenger Miles per Seat Mile** establishes the extent to which provided capacity is actually used. The poorest 15% of bus lines in each service type are reviewed in detail.
- **Route Performance Index** should be 0.60 or greater by service type (Section 4.2 provides more details).

4.2 Route Performance Index

The Route Performance Index (RPI) is a conventional industry measure used to ensure Metro services are effective and provide a reasonable return on investment. The RPI is designed to provide an objective measure of a bus route's performance relative to system performance. The index is based on system ridership and financial targets from the current fiscal year Metro Budget.

This measure is applied to all Metro bus lines that have been in operation for more than one year. The RPI is used to identify under-performing lines. Specific corrective actions are taken during the service change process. Corrective actions may include marketing, service restructuring, implementing an alternative service, or discontinuation of service.

Defining RPI Variables

The RPI considers the following three variables in creating the index. No weight is given to an individual measure; rather the selected statistics represent all facets of the operation in terms of cost efficiency, service effectiveness, and passenger use.

- **Utilization of Resources:** Passenger Boardings per Revenue Service Hour (RSH) is used as a measure to determine how effectively resources are used on a given line. This measure is determined by dividing the total number of boardings by the RSHs operated. A route having a higher number of boardings per RSH represents a better utilization of resources such as buses, operators and fuel.
- **Utilization of Capacity:** Passenger Miles per Seat Mile is the measure used to evaluate how well the seating capacity of the system is being used. Passenger miles are calculated by multiplying the average distance traveled per passenger by the number of passengers using the service. Seat miles are calculated by determining the number of seats per vehicle by the number of service miles operated. A higher resulting number indicates greater utilization of system capacity.
- **Fiscal Responsibility:** Subsidy per Passenger is the measure for fiscal responsibility. Subsidy refers to the amount of public funding required to cover the difference between the cost of operation and the passenger revenues collected. Higher subsidy services require more public funding support.

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The formula for calculation of the RPI for each Metro Bus line is as follows:

$$\text{RPI} = ((\text{Psgr./RSH/System Avg.})+(\text{Psgr. Miles per Seat Mile/System Avg.})+(\text{Subsidy per Psgr./ System Avg.}))/3$$

Lines with an index of 1.0 perform at the system average, while lines with an index of less than 1.0 perform below the average. Lines with an RPI lower than 0.6 are defined as performing poorly and targeted for corrective action. Lines that have been subjected to corrective actions and do not meet the 0.60 productivity index after six additional months of operation may be discontinued, subject to Metro Service Council or Board approval.

The RPI is calculated and reported quarterly by Metro's Service Planning & Scheduling Department. The performance measurement standards for each route are set annually relative to the percentage improvement of overall system performance relative to the previous year's performance. This percentage improvement will be based on the performance objectives outlined in the Metro Annual Operating Budget.

4.3 Service Change Performance Evaluation

Schedule adjustments to bus or rail should be evaluated shortly after implementation to determine if there are any obvious issues. This should include line rides and visits to the operating divisions to receive comments and recommendations from passengers, operators and supervisors. Appropriate adjustments should be made as required. After three months of operations, the schedules should be evaluated in detail to begin the process of schedule adjustments for the next service change cycle.

Route modifications to bus service should also be evaluated shortly after implementation similar to the schedule evaluation outlined above. The overall goals of the service changes such as reducing costs, improving connections, increasing bus speeds, and increasing ridership, among others, should have near term goals that are established prior to the service change process. At about 6 months after service implementation, the performance of the changes should be evaluated relative to the established goals. Remedial actions, if necessary, should be developed and considered for the next service change cycle.

4.4 Service Policy Regarding Realignment of Metro and Municipal Bus Service

The regional public transit network consists of 17 "Included or Eligible" fixed route operators (including Metro). Included operators (and routes) are those that were operating within LA County in 1971 at the time of adoption of the TDA/STA statute. Eligible operators (and routes) are those added to the Formula Allocation Procedure (FAP) since that time.

Much of the funding for operation of "Included or Eligible" fixed route public transit service in Los Angeles County is distributed according to an adopted FAP. The FAP allocates sales tax receipts for public transit each fiscal year in support of public transit throughout the region.

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Many of the “Included and Eligible” systems operate under the guidelines of the “reserve service areas” established in 1971.

Since that time, Metro’s network of lines spanning Los Angeles has changed considerably, especially with the passing of Proposition A (1980 sales tax initiative). Municipal operators have also grown, providing an expanded route network that has improved connections to Metro’s regional lines. In addition, there are numerous Local Return fixed route transit providers who are not eligible for FAP funding, but instead are funded through Propositions A and C (1990 sales tax initiative), and Measure R (2008 sales tax initiative). These Operators are funded as “Local Return” operators (see Appendix F for a list of operators funded as Local Return and/or Included/Eligible Municipal operators).

Since the PRC convened in 2015 provided policy guidance regarding Metro’s transit network, Service Planning staff has considered service modifications that would best fit with each of the major transit providers. The policy guidance states that the network should be well integrated, coordinated, reduce service duplication, and simplify service. Therefore, the evaluation of transit corridors for consideration to be operated in the future by another operator should include:

- Existing performance relative to the system average;
- Value to the customer through integration into an established nearby transit provider;
- Net cost to each operator and the region;
- Completion of another operator’s route network;
- Provide improved connections to a Municipal Operator’s established network;
- Impacts to exiting and projected ridership;
- Generation of a net cost savings to Metro based on Metro’s calculation of the FAP impacts for all service realignment proposals.

If a proposed service change is adopted that results in a reduction of service, Metro should reinvest at least half of the net savings (operating cost less passenger and FAP reduction) to improve service on Metro’s core network of regionally significant lines in the service area from which the savings were drawn.

Any significant service modifications will be subject to review under Title VI of the Civil Rights Act of 1964, as amended, the approval of the appropriate Metro Service Council(s) and the local transit provider’s Board of Governance, and must be in compliance with local, regional, and labor legislation or agreements. Finally, the agency that assumes service will be required to maintain or improve the days, spread, and frequency of the exiting service for at least a one-year period. In addition, the assuming agency must be a participant in the regional TAP program to minimize fare change impacts.

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SECTION 5: IMPLEMENTING THE PLAN

Taking advantage of the foregoing principles and standards, this section identifies the actions necessary to implement the recommendations of the APTA Peer Review Committee and the PRC in relation to the Strategic Bus Network Plan. At the core of all of these elements is the development of a set of high frequency lines that provide regional service and connections with minimum 15-minute peak headways for all services addressed in the plan. Figure 5.1 displays the existing network of 15-minute services and is overlaid by additions to the plan needed to close gaps or make connections not currently offered as identified by the PRC. All identified service additions were reviewed by Service Planning staff and-prioritized into four categories A – D reflecting the importance and ease of implementation. The top two priority groupings were included on the map for presentation to the PRC.



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Figure 5.1 Existing 15 Minute Plus Peak Service by Street Segment with Possible Additional Segments by Priority

Taken together, without any reconfiguration of the remainder of the service network, priorities A and B together would add approximately unbudgeted annual 116,000 RSH.

Forecasts of RSH for the agency reflects a flat and/or slightly declining number of hours allocated to the Local and Rapid Bus portions of the system. Conversely, BRT RSH are

expected to grow with the projected conversion of a portion of Line 720 Rapid to BRT in FY2016. The Orange and Silver Lines are in the BRT service category although the RSH for them are broken out. Table 5.1 presents the projected bus RSH through FY2020.

Table 5.1

Bus Revenue Service Hours by Service Type

Service Type	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020
Local + Rapid	6,327,663	6,227,663	6,227,663	6,227,663 ¹⁰	6,265,434	6,245,434 ¹¹
Silver Line	84,380	84,380	84,380	84,380	84,380	84,380
Orange Line	130,516	130,516	130,516	130,516	130,516	130,516
Wilshire BRT		100,000	100,000	100,000	100,000	100,000
Contracted	519,176	519,176	519,176	519,176	519,176	519,176
Total	7,061,735	7,061,735	7,061,735	7,061,735	7,099,506	7,079,506

Source: OMB, FY2016 Adopted Budget

In addition to existing services, new rail projects such as Expo Phase 2, Foothill Gold Line Extension, Regional Connector, and the Crenshaw/LAX Transit Project are considered enhancements to the transit system. These new rail projects will expand the travel horizons for residents and visitors to Los Angeles County.

Metro Bus service is only minimally impacted by the extensions to the Gold and Expo Rail lines, as the extensions fall mostly in areas operated by Foothill Transit or Santa Monica Big Blue Bus. However, staff will need to complete a thorough review for each rail line to see if there are opportunities to make simpler connections to the rail system, minimize duplication and thereby create a pool of RSH savings for reinvestment into the base network in support of the 15-minute service plan. In the case of the Crenshaw Line, it is anticipated that parallel Rapid service will be reduced significantly and corresponding RSH savings will be made available to reinvest in the system. Since the budgeted RSH remain flat over the next five years, gaining savings for reinvestment elsewhere in the system is significantly beneficial.

5.1 Changes to the Rapid Bus Network

The Rapid Bus network was originally based on specific warrants developed to maintain their inherent speed advantage over the underlying Local service. Over time, the agency fulfilled constituent requests for additional service stops which resulted in the slowing of service speeds. Further, the distinctive street furniture and informational displays that were intended to brand the Rapid network were never fully implemented such that other than Lines 720 and 750, the majority of Rapid services use identified street stops. Where lines lost ridership along

¹⁰The Wilshire 720 Rapid is scheduled using 213,340 annual RSH. The 100,000 RSH shown under BRT is for the estimated portion of the line that will operate as a BRT in the newly opened bus lanes. Hence, the total annual RSH is still 213,340 RSH; the operation is shown as 113,340 RSH in Local + Rapid and 100,000 RSH in BRT.

¹¹20,000 annual RSH reduced for implementation of Crenshaw Line.

with their speed advantage, services were adjusted below the warrants and standards such that resulted in some lines being cancelled or reduced to limited stop operation and peak headways being widened to 10 to 30 minutes at maximum.

The plan assumes that the Rapid Bus Lines would be brought up to meet the headway warrants of 15-minute peak and 30-minute off-peak maximums. Today, 1,040,075 annual Bus RSH are operated by the 19 Rapid Bus routes. Bringing these routes to a 10-15 minute peak / 20-30 minute base headways for Rapid Bus service would require the addition of unbudgeted 142,127 annual Bus RSH.

5.2 Goals and Objectives

The service planning process includes the following goals and objectives:

- **Simplify Bus Routes** – Existing bus routes and bus stop boardings will be reviewed to determine if more intuitive routes would increase patronage, reduce travel time, improve on-time performance and reduce accidents.
- **Improve Travel Speed** – Travel speeds continue to decrease along Metro routes. Bus stop spacing, bus route design, and potential faster bus boarding techniques will be inventoried for improvements.
- **Re-Invigorate the Metro Rapid Network** – Since the inception of the Metro Rapid Program in year 2000, Rapid lines have been added, and some deleted or modified. These lines will be analyzed to determine their need, regional importance, improvements, and possibly identify new Rapid lines.
- **Improve connectivity to the Rail/BRT/Rapid and Express services network** – Routes will be reviewed to determine how they might better serve the network. As an example, a new Line 162 (part of Line 163-Sherman Way) connected peak period Sherman Way residents directly with the North Hollywood Metro Red and Orange Line Stations, thereby eliminating a transfer. Due to the popularity of the route extension, Line 162 now operates all day to North Hollywood, providing improved connections to this important transportation hub.
- **Improve bus lines of regional significance** – Existing headways, connectivity and patronage will all factor into identifying and recommending improvements to routes of regional significance.
- **Review the owl service network** – Metro’s owl network has changed little over the last 20 years, and with growing rail and BRT services (now operating until 2:00AM on Friday and Saturday nights), local services will be reviewed to determine proper alignment with changing late night travel patterns.

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- **Improve service quality** – On-street and Bus Operations Control management procedures will be reviewed towards a goal of improving line management, on-time performance, and accident reduction.
- **Improve the cost model to better fit service/vehicle types** – Currently, Metro operates a variety of bus sizes (32 to 60 foot), and rail operates light rail and heavy rail vehicles. The existing cost model will be reviewed to determine if it should be modified to account for the differing types of operated services.

5.3 System and Service Evaluation

Services are evaluated based on segments (geographic, time of day, and day of week) using evaluation criteria outlined in Metro's TSP as well as other pertinent measures including ridership, boardings per RSH, subsidy per boarding, peak load factor, and on time performance. Services that are inconsistent with demand, or do not meet system standards will be identified for reduction, discontinuation, or restructuring. Services that have potential for exceeding existing performance will be identified for possible enhancements as should markets that are currently not well served. The following priorities will be considered when restructuring the Metro system:

- **Priority 1** – Restructure services that are duplicative with Metro Rail, other Metro Bus routes, and Municipal and Local Return operator services. Such services will be identified for discontinuation, consolidation, reduction and/or reallocation to achieve greater productivity and cost efficiency.
- **Priority 2** – Restructure services to increase system speed, on-time performance, and balance loads.
- **Priority 3** – Restructure remaining services (constrained by existing budget) based on the service concept and to address major gaps and deficiencies. Prioritize these service adjustments.
- **Priority 4** – Develop new services (unconstrained) to address all gaps and deficiencies. Prioritize these new services.

Significant changes to municipal operator services, including Santa Monica Big Blue Bus, Culver City Transit, and Foothill Transit are incorporated into the evaluation of existing and new services as possible enhancements to address identified gaps or deficiencies in service.

5.4 Develop Service Draft Restructuring Plan

Each service adjustment proposed will be described with the following information:

- Description of service, including rationale for service
- Line map showing routing, exact layover locations, and stops
- Service span (hours, days, and seasons)

- Headway (time period, days, and seasons)
- Estimated ridership
- Financial, operating and performance statistics
- Vehicle requirements

Supporting facilities and programs recommended as part of the service restructuring will be described. The restructuring plan will focus on impacts to ridership, costs, productivity, and cost effectiveness, quality of service (e.g. on-time performance and travel time), vehicle requirements, staffing requirements, and operational efficiencies.



Metro Celebrates 25 Years of Rail Service. Photo courtesy of Scott Page

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SECTION 6: SERVICE CHANGE PROCESS

In accordance with contractual agreements with the Sheet Metal Air, Rail and Transit Union (SMART)¹², bi-annual service changes will be implemented in June and December. Metro service changes are conducted to modify service based on patronage demand, running time adjustments, performance monitoring results, and budget considerations. Table 6.1 is an established service change timeline. A service change process work flow also is provided in Appendix G.

Table 6.1

Service Change Timeline

Key Activities	Required Lead Time (Months Prior to Implementation)
Initiate Planning Process	12
Develop Preliminary Recommendations	7-8
Impact Analysis for Proposed Changes	6-7
Title VI Equity Analysis on Major Service Change and Fare Change Proposals	5-7
Service Council Review and Input	6-7
Confer with Labor Relation and Union Representatives	6-7
Public Review and Input	5
Finalize Service Change Program	4-5
Program Approval	3-4
Develop New Service Schedules	2-4
Print Public Time Tables and Operator Assignments	1-2
Fabricate Decals for Bus Blades	1-2
Print Bus Cubes/Take-One Bus Inserts	1

Metro Service Councils provide a forum for the community and local municipal operators to express needs and priorities and evaluate opportunities and service coordination issues. Service change programs are developed based on input generated by a wide variety of sources including customer and employee input, service restructuring studies, requests from other local operators, and performance monitoring results. The service change process includes public review of the proposals, a technical evaluation of ridership impact, and Title VI equity analysis (discussed in Section 5.1).

¹² The United Transportation Union (UTU) merged with the Sheet Metal Workers Union in 2014 to form SMART.

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Other factors considered are service performance, availability of alternatives, and mitigation strategies. As part of the evaluation process, resource impacts to in-service hours and required vehicles are also tracked to ensure compliance with budget parameters. Below is a summary of the purpose of an evaluation on proposed service changes:

- Define and evaluate the impact on riders
- Determine whether a proposed major service change or fare increase will have disparate adverse impact on minorities or a disproportionate burden on low-income individuals by performing a Title VI Equity Analysis
- Alternatives will be considered if a disparate adverse impact to minorities or disproportionate burden on low-income individuals are identified
- Staff will develop appropriate mitigation measures if needed
- Determine whether or not a public hearing is required

Changes to the rail system occur less frequently. They generally relate to the opening of a new line or adjustments to the frequency or hours of operation for existing service. Changes in rail and bus service follow the same planning and implementation process.

6.1 Title VI Equity Analysis

In accordance with FTA's Title VI Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" (Effective October 1, 2012), Metro's Administrative Code was revised to incorporate FTA's requirements under Title VI. The Metro Board adopted the updated Administrative Code in January 2013. Based on this Circular, Metro is required to perform a Title VI Equity Analysis on all proposed major service changes or fare changes prior to its implementation. The goal is to ensure there is no *disparate adverse impact* to minorities or *disproportionate burden* on low-income individuals created by a major service or fare change. The following definitions and criteria can be found in Metro's Administrative Code in Chapter 2-50 Public Hearings Subsection 2-50-005 Definitions:

- **Disparate Adverse Impact** refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color or national origin and the policy lacks a substantial legitimate justification including one or more alternatives that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color or national origin.
- **Disproportionate Burden** refers to a neutral policy or practice that disproportionately affects low income populations more than non-low income populations. A finding of disproportionate burdens for fare and major service changes requires Metro to evaluate alternatives and mitigate burdens where practicable.
- **Major Service Changes:** A *disparate adverse impact* will be deemed to have occurred if the absolute difference between the percentage of minorities adversely affected and the overall percentage of minorities is at least 5% or if there is 20% or greater percent

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difference between the percentages of these two groups. A *disproportionate burden* will be deemed to exist if absolute difference between the percentages of low-income adversely affected by the service change and the overall percentage of low-income persons is at least 5% or if there is a 20% or greater percent difference between the percentages of these two groups.

- **Applicable Fare Changes:** A *disparate adverse impact* will be deemed to have occurred if the absolute difference between the percentages of minorities adversely affect the overall percentage of minorities is at least 5% or if there is a 35% or greater percent difference between the percentages of these two groups. A *disproportionate burden* will be deemed to exist if absolute difference between the percentages of low-income adversely affected is at least 5% or if there is a 35% or greater percent difference between the percentages of these two groups.

Discretion of the Metro Board of Directors

A *Major Service Change* or *Fare Increase* may be implemented even if the Title VI Equity Analysis determines a *disparate adverse impact* to minorities or *disproportionate burden* on low-income individuals were created by the change. However, the Metro Board of Directors must first ensure these changes meet two tests:

- There is a substantial legitimate justification for adopting the proposed major service change or fare increase, meaning the selected service change or fare increase meets a goal that is integral to the mission of Metro; and
- The selected alternative would have a less severe adverse effect on Title VI protected populations than other alternatives that were studied.

Major Service Change

Metro's Administrative Code in Chapter 2-50 Public Hearings Subsection 2-50-010 defines a major service change as any service change meeting at least one of the following criteria:

1. A revision to an existing transit route that increases or decreases the route miles by 25% or the revenue miles operated by the lesser of 25%, or by 250,000 annual revenue service miles at one time or cumulatively in any period within 36 consecutive months;
2. A revision to an existing transit service that increases or decreases the revenue hours operated by at least 25% or by 25,000 annual RSH at one time or cumulatively in any period within 36 consecutive months;
3. A change of more than 25% at one time or cumulatively over any period within 36 consecutive months in the number of total revenue trips scheduled on routes serving a rail or BRT station, or an off-street bus terminal serving at least 4 bus routes;
4. A change of more than 20% of the total system revenue miles or revenue hours in any 12 month period;

5. The implementation of a new transit route that results in a net increase of more than 25,000 annual revenue hours or 250,000 annual revenue miles; and,
6. Six months prior to the opening of any new fixed guideway project (e.g. BRT line or rail line) regardless of whether or not the amount of service being changed meets the requirements in 1 through 5 above.

Fare Changes

Metro's Administrative Code in Chapter 2-50 Public Hearings Subsection 2-50-015 addresses fare change equity evaluation and provides the following guidance:

1. A Fare Equity Analysis shall be prepared for any fare change (increase or decrease). This includes, but is not limited to permanent fare changes, temporary changes, promotional fare changes and pilot fare programs. The analysis will evaluate the effects of fare changes on Title VI protected populations and low-income populations. The analysis will be done for fares not available to the general public such as special discount programs for students, groups or employers.
2. If fare changes are planned due to the opening of a new fixed guideway project, an equity analysis shall be completed six months prior to opening of the service.
3. Each Title VI Fare Equity Analysis shall be completed and presented for consideration of the Board of Directors in advance of the approval of the proposed fare or fare media change by the Board of Directors. The Equity Analysis will then be forwarded to the FTA with a record of action taken by the Board.
4. A Title VI analysis is not required when:
 - a) A change is instituted that provides free fares for all passengers;
 - b) Temporary fare reductions are provided to mitigate for other actions taken by Metro;
 - c) Promotional fare reductions are less than six months in duration. An equity analysis must be conducted prior to making any temporary fare change into a permanent part of the fare system.

6.2 Public Outreach

Prior to the public hearing, a number of public outreach efforts are made so that the greatest number of patrons may respond to the changes at either a public hearing or by submitting written comments at a hearing, or via email, mail, or fax. In accordance with Metro's Administrative Code in Chapter 2-50 Public Hearings Subsection 2-50-025:

1. Any public hearing required by Section 2-20-020 shall be conducted as set forth in this section.
2. Notice of the hearing shall be published in at least one English language and Spanish

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language newspaper of general circulation and at least thirty (30) days prior to the date of the hearing. Notice at least thirty (30) days prior to the date of the hearing shall also be published in the neighborhood and foreign language and ethnic newspapers as appropriate to provide notice to the members of the public most likely to be impacted by the proposed action.

3. Notice of the public hearing shall also be announced by brochures in English, Spanish and other appropriate languages on transit vehicles serving the areas to be impacted and at customer service centers.
4. In order to ensure that the views and comments expressed by the public are taken into consideration, MTA staff shall prepare a written response to the issues raised at the public hearing. That response should also include a general assessment of the social, economic and environmental impacts of the proposed change, including any impact on energy conservation.
5. The public hearing related to a recommendation to increase transit fares charged the general public shall be held before the Board of Directors and any action taken to increase the fares charged the general public must be approved by a two-thirds vote of the members of the Board of Directors. The Board of Directors may delegate to another body or a hearing officer appointed by the Chief Executive Officer the authority to hold the public hearing related to a change in transit service.

The distribution of information will include line number, line name, route change information, and/or fare change proposals. Other public outreach occurs at key transportation centers, bus stops, and bus and rail stations 30 days prior to the public hearing date. These efforts are made to reach and engage patrons who may not have time to attend a public hearing and to inform them of alternative communication methods available to file public comments. Public participation in the public hearing process is an important step in assisting staff and Metro Service Councils in developing and approving final service change proposals. Table 6.2 is a timeline for public notification activities.



Metro Public Meeting

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Table 6.2

Timeline for Public Notification Activities

Activity	Months Prior to the Service Change
Service Planning staff reviews preliminary proposals.	7
Metro Service Councils set dates of public meetings, publish hearing notices in local newspapers and send LEP and minority communities written notification to elected officials, other operators and key stakeholder groups. Confer with Labor Relations and Union representatives.	5-6
Service Planning staff provides information on proposed changes to the Metro Bus Operators Subcommittee and at quarterly meetings held with the region's municipal and local operators.	3
Communication Department posts information proposed changes on Metro's website.	5
Operations staff distributes meeting notices on board vehicles. Public outreach at key transportation centers, bus stops, and on board patron interface occurs as well.	At least one month prior to public hearings
Metro Service Councils conduct public hearings.	4
Metro Service Councils approve final service change program.	3
Communication Department prepares press releases on final program and program brochures are distributed on-board Metro vehicles and other outlets.	1

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6.3 Public Hearing Process

Once a Service Change Program has been developed by Metro Service Planning Staff, the Metro Service Councils are asked to set a date, time and place for their public hearings. During the period between publication of the hearing notices and public hearings, each Service Council is provided a detailed presentation on service change proposals and given an opportunity to discuss each of the changes that will be the subject of public comment. Subsequent to each hearing, each Service Council will meet to consider and approve, modify, or deny all proposed service changes. These actions will then be summarized and presented in an informational report to the Metro Board of Directors.

Public hearings are usually held at the same location where the Service Councils hold their meetings, but may be held at other locations at their discretion. Under Metro's Revised Service Council by-laws, all service changes must be reviewed and approved by their respective Service Council(s). In accordance with Metro's Administrative Code in Chapter 2-50 Public Hearings Subsection 2-50-020, Metro will hold a public hearing on all major service change or fare change proposals that are subject to a Title VI Equity Analysis. These proposals are subject to Metro Service Council and Metro Board approval.

6.4 Implementing Minor Changes on an Interim Basis

Minor service changes are generally route modifications that can be accommodated without impacting the vehicle or operator requirements of the service. Minor service changes do not require a public hearing, but can be implemented at the discretion of staff.



Metro Silver Line at El Monte Station

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SECTION 7: CONCLUSION


Metro's vision is to maintain a world-class public transit operation and meet the challenges related to serving the evolving, diverse needs of passengers, communities, and other transit providers. Metro realizes this is contingent on innovative thinking that stems from a solid base of sound planning principles. To meet the changing needs of a growing population in Los Angeles County, Metro will continue to expand its high-speed bus and rail network across the region under Measure R and the 30/10 Initiative.

As the coordinator of regional transit services, Metro must provide safe, reliable, effective, and convenient services focused on both customer and employee with an emphasis on long-term sustainability. Achieving this delicate balance between maximizing the benefits of service to transit riders, while ensuring that service delivery is efficient and cost effective requires policy guidance and service standards that are designed to target specific levels of productivity, efficiency, and quality.

Given the significant growth in the Municipal and Local Return transit operators and Metro's rail network, Metro's vision can be achieved through better coordination between the various transit service providers, by leveraging the expansion of its rail network, and by reducing service duplication. These measures will make the transit system more efficient and manageable, resulting in better service quality and a simpler, more user-friendly system to use.

In addition, Metro will ensure a Title VI Equity Analysis is performed on all major service change and fare change proposals to determine if these proposals will have a disparate adverse impact on minorities or disproportionate burden on low-income individuals prior to a public hearing. If it is determined that these proposed changes will have a disparate adverse impact on minorities or a disproportionate burden on low-income individuals Metro will make a good-faith effort to mitigate or reduce the adverse impacts by looking for alternatives.

Overall, the 2016 Metro TSP establishes a set of performance criteria and standards, provides quantitative tools to evaluate the system, and describes how the service change process will be conducted to ensure the opportunity for feedback to be provided by the various stakeholders. The TSP service design guidelines ensure the transit system developed is consistent with policy guidance approved by the Metro Board of Directors.



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APPENDICES

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APPENDIX A: 2015 PEER REVIEW COMMITTEE MEMBERS

Citizens Advisory Council

Anne Reid
Dalila Sotelo

Foothill Transit

Doran Barnes
Joseph Raquel

Gardena Transit

Jack Gabig

Gateway Cities Service Council

Gene Daniels
Wally G. Shidler

LADOT

Phil Aker

Long Beach Transit

Shirley Hsiao
Kenneth McDonald

Pasadena ARTS

Valerie Gibson

San Fernando Valley Service Council

Antonio Lopez
Yvette Lopez-Ledesma
Dennis Washburn
Donald Weissman

San Gabriel Valley Service Council

Harry Baldwin
Alex Gonzalez
Dave Spence
Rosie Vasquez

Santa Monica Big Blue Bus

Edward King
Timothy McCormick

South Bay Service Council

Devon Deming
Don Szerlip

Torrance Transit

Kim Turner

Westside Central Service Council

Elliott Petty
George Taule

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APPENDIX B: METRO LINE IDENTIFICATION

The purpose of establishing transit service line identification standards is to create a simple way for passengers to identify, locate, and reference Metro services, and thereby make the services easier for patrons to use.

The line identification standards shall be adhered to when identifying Metro Bus and Metro Rail lines by name. The standards shall be implemented across all internal and external mediums including, but not limited to, bus stop signs, bus station signs, vehicle headsigns, time tables, the Metro Transit Trip Planner, HASTUS and ATMS. The descriptions and chart below help explain the standards, and how and when they should be implemented.

General Standards

- Transit service lines will be identified using a combination of line number, destinations (both terminals) and the corridor(s) the line travels along, with the exception of Metro Rail and Metro Liner service which will use the established operational name (e.g., Metro Red Line, Metro Purple Line, Metro Orange Line).
- Acceptable destination names include a city, community, major landmark, transit center or rail station. Street intersections are no longer to be used as a destination, unless the intersection is required to identify short-line service.
- The destination points will be listed in a West to East or North to South order, consistent with how the line would be read on a map.
- Lines that have Downtown Los Angeles as one of the line's end points will list its first, as Downtown LA.
- The name of the line will also list at least one major corridor on which it travels.
- Name abbreviations, street extensions and other topics will be dictated by the Metro Signage Guidelines.

Printed Materials and Electronic Customer Information

- The line will be presented using the full name, listing both the destinations and major corridor(s).
- The printed materials include, but are not limited to, timetables, service change announcements, brochures, system maps, and service reports.
- Electronic customer information includes the line information presented on metro.net and underlying electronic databases such as HASTUS and ATMS.
- The Metro Transit Trip Planner will present the line name similarly to what will be shown on the vehicle headsign and bus stop sign, so patrons can easily locate the appropriate line at the stop.

Bus Stop Signage:

- The line will be presented using the line number, service brand, color and destination point that the vehicle is traveling to in each direction.
- The main corridor(s) will also be listed as well as special service qualifiers including, but not limited to, rush-hour service and weekday-only service.
- Short-line trip destinations will not be shown on bus stop signs.

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Vehicle Headsigns

- Headsigns will list the destination in which the vehicle is traveling towards in one frame.
- For short-line trips, the line number and destination shown will be the destination of that trip and not of the entire line.
- When the line is not in service, the sign will read "Not in Service" and display the route number per Operations Notice #09-18.

Automatic Voice Announcements

- External On-Board Announcements:
 - The line will be identified in automatic external voice announcements using the line number and destination point that the vehicle is traveling to in each direction.
 - For short-line trips, the destination noted will be the destination of that trip and not of the entire line.
- Internal On-Board Announcements:
 - When the automatic voice announcement system identifies a stop, the end destination of that line will follow.
 - The stops and stations announced onboard should be consistent with names used on maps, timetables and other printed materials.

Assigning Line Identifiers

It is expected that the standards will be easily applied to the majority of lines; however, it is also understood that exceptions will have to be made for some lines due to unfamiliar end points or corridors. In these limited cases, Service Planning staff and Communications must be in consensus regarding these changes before deciding to deviate from the standards.



Metro Orange Line

Metro’s Bus Line Identification, Route Numbering and Color Conventions

Service Type	Numbering	Primary Route Direction	Color Scheme
Local	1-99	Serves Downtown LA - counterclockwise from NW quadrant.	California Poppy
	100-149	Primarily EW operation in areas S of LACBD	California Poppy
	150-199	Primarily EW operation in areas N of LACBD	California Poppy
	200-249	Primarily NS operation in areas W of LACBD	California Poppy
	250-299	Primarily NS operation in areas E of LACBD	California Poppy
Limited	300-399	Branch of local line.	California Poppy
Express	400-499	Serves Downtown LA -- numbered counterclockwise from NW quadrant.	California Poppy
	500-599	Does not serve LACBD.	California Poppy
Shuttle	601-649	Generally circuitous routing within service area.	California Poppy
	650-659	Generally scheduled service operating point-to-point.	California Poppy
	660-699	Generally serves a rail line within service area.	California Poppy
Rapid Bus	700-799	Operated in combination with an underlying Local line.	Red
Specialized Services	901	Metro Liner: Orange Line (BRT)	Silver
	910	Silver Line: I-10 and I-110 Express Lanes	Silver

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APPENDIX C: METRO RAPID PROGRAM SERVICE WARRANTS

Launched in June 2002, the Metro Rapid program began with two demonstration lines – one along Ventura Blvd. in the San Fernando Valley and the other along the Wilshire/Whittier Transit Corridor. Based on the success of these two demonstration lines, the program was expanded across the county. Currently there are 23 Rapid routes – 19 operated by Metro and four operated by local municipal operators.

PROGRAM PRINCIPLE: Improve Operating Speed and Frequency.

PROGRAM GOAL: Minimum operating speed improvement is 20% over existing local service.

Program Element	Program Component	Program Objective
Corridor Alignment	Maximize patronage and minimize costs	Identify core segment of corridor for Metro Rapid operation to maximize patronage (500 passengers per route mile or greater) and minimize operating costs. This includes minimizing corridor turning movements to maximize safe and reliable operating speeds, reliable service, and ease of use among our customers.
	Alignment modification	Changes to the alignment including the addition of short lines and branches require an analysis of impacts on customers, line performance, operating costs, capital costs and impacts to existing and planned transit signal priority systems (TSP).
	Maintenance of operating speed	Maintenance of the Program Goal is required. Corridor vehicle run times will be monitored. Improvements in operating speed are encouraged through improved stop placement, signal priority software, elimination of unproductive stops, introduction of bypass lanes, and improved BOCC and TOS management.
Stop Location	Station spacing average no less than 0.70 miles	Station spacing should average no less than 0.70 miles per corridor and be based on existing ridership and connections with other bus and rail service. Stations should be located to maximize connectivity with other Rapid, Metro Liner, Metro Rail, and commuter rail stations. Station locations must be planned to accommodate either 45-foot or 60-foot buses.
	Far-side station location	Far-side stop locations are desired to realize TPS and be planned at all intersections for both Metro Rapid and Local service. The only exceptions are where far-side stop locations are not possible within a reasonable walk from the intersection or where nearside locations facilitate access for greater than 75% of the boardings, e.g., intersecting Metro Rail station portals.
	Separation from local stop	Metro Rapid and Local bus stop locations should be located adjacent but not combined with each other wherever practical. This minimizes the confusion of where to wait for service and gives the customer the option of choosing the first bus that arrives. This also improves customer safety by eliminating the back and forth movement between nearside and far side stop locations while waiting for the next bus to arrive.
	Addition of new stop	Stops may be added only if they exceed 250 all-day boardings and alightings (100 boardings if within one mile of line terminal) and as long they will not adversely impact the minimum average stop spacing of 0.7 miles. Added stops require an analysis of impacts on customers, line performance, operating costs, and capital costs.
	Elimination of stop	Stops may be eliminated due to low passenger demand as long as their removal will not result in excessive spacing among the remaining stops along the line. An analysis of impacts on customers, line performance, operating costs, and capital costs is required.

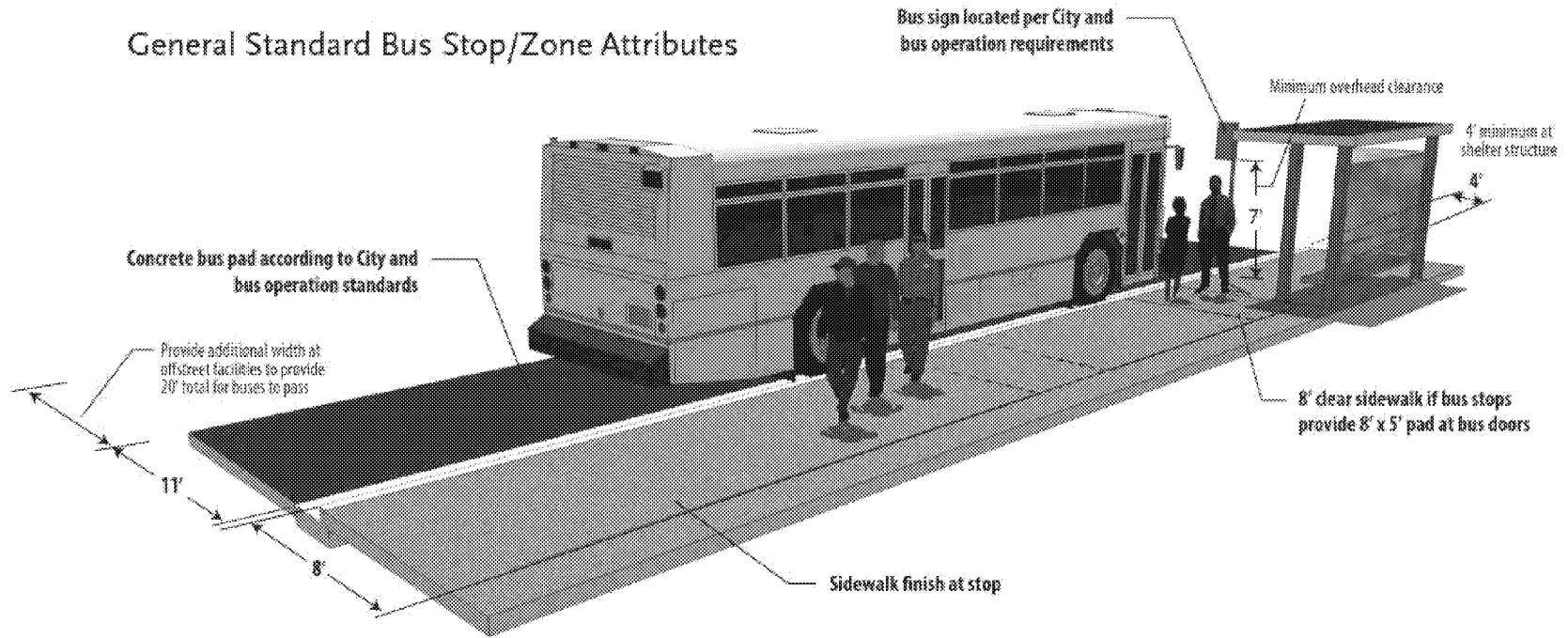
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Program Element	Program Component	Program Objective
Transit Priority	All signalized intersections should provide bus signal priority for Metro Rapid	Signal priority should include terminal movements to reduce operating costs.
	Identification of by-pass lane needs	At points of significant delay due to traffic congestion, an analysis will be developed of the feasibility of establishing by-pass lanes for Metro Rapid service.
	Monitor effectiveness of transit priority measures	The effectiveness of the transit priority measures will be periodically analyzed and recommendations will be developed for potential further improvements where warranted. Every effort should be made to ensure that buses with transponders are assigned and that every transponder is working properly.
Rapid Vehicle Fleet	Metro Rapid lines are assigned one vehicle size, i.e., 40-ft, 45-ft, or 60-ft articulated	The planned service frequency will be based on deployment of a particular size bus and these vehicles will need to be assigned to the particular line and operating Division. Only one size vehicle should be scheduled and operated on each line in order to avoid passenger overcrowding and service bunching.
	Vehicles must be in Metro Rapid livery	Metro Rapid vehicles may be operated only on Metro Rapid routes. On the rare occasion that a red bus is unavailable for pullout, a local bus may be substituted to ensure pullout. Operation of "branded" Metro Rapid buses is integral to the operating speed, simplicity of service, and customer experience.
Service Frequencies	Weekday peak frequency	The minimum weekday peak frequency should be 10 minutes or less.
	Weekday off-peak frequency	The preferred minimum weekday off-peak frequency is 20 minutes or less. Minimum frequency is subject to funding availability and may be relaxed to no more than 30 minutes. Service with headways wider than 20 minute should be re-evaluated and may warrant corrective action as the result.
Service Span	Service Span	Metro Rapid span of service should be from 5:00 a.m. to 9:00 p.m. on weekdays. Metro Rapid service should operate on weekends when warranted by passenger demand.

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APPENDIX D: TYPICAL BUS STOP/ZONE DESIGN AND GUIDELINES

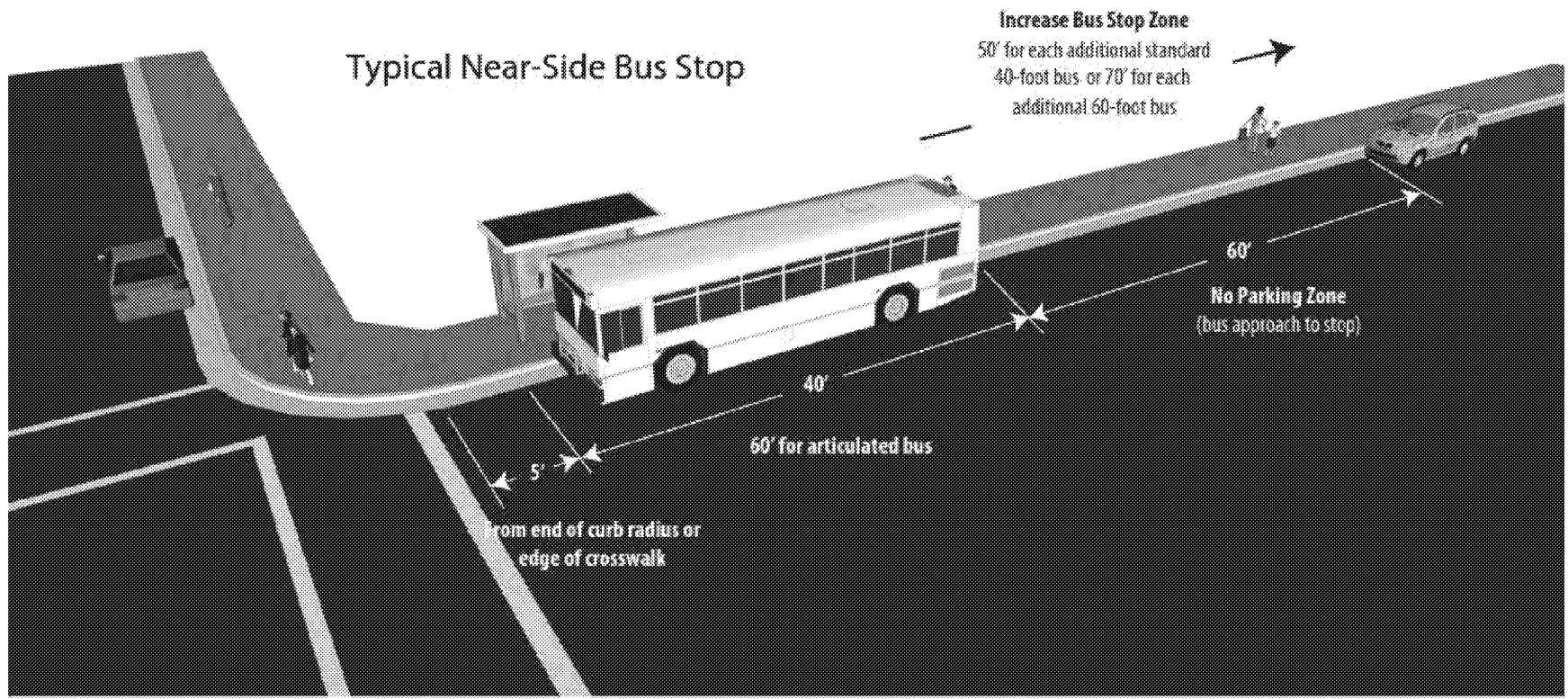
General Standard Bus Stop/Zone Attributes



Note:
City of Los Angeles Requires its standard bus shelter to be 12-14 feet long, 4 1/2' wide, and 9 1/2' high

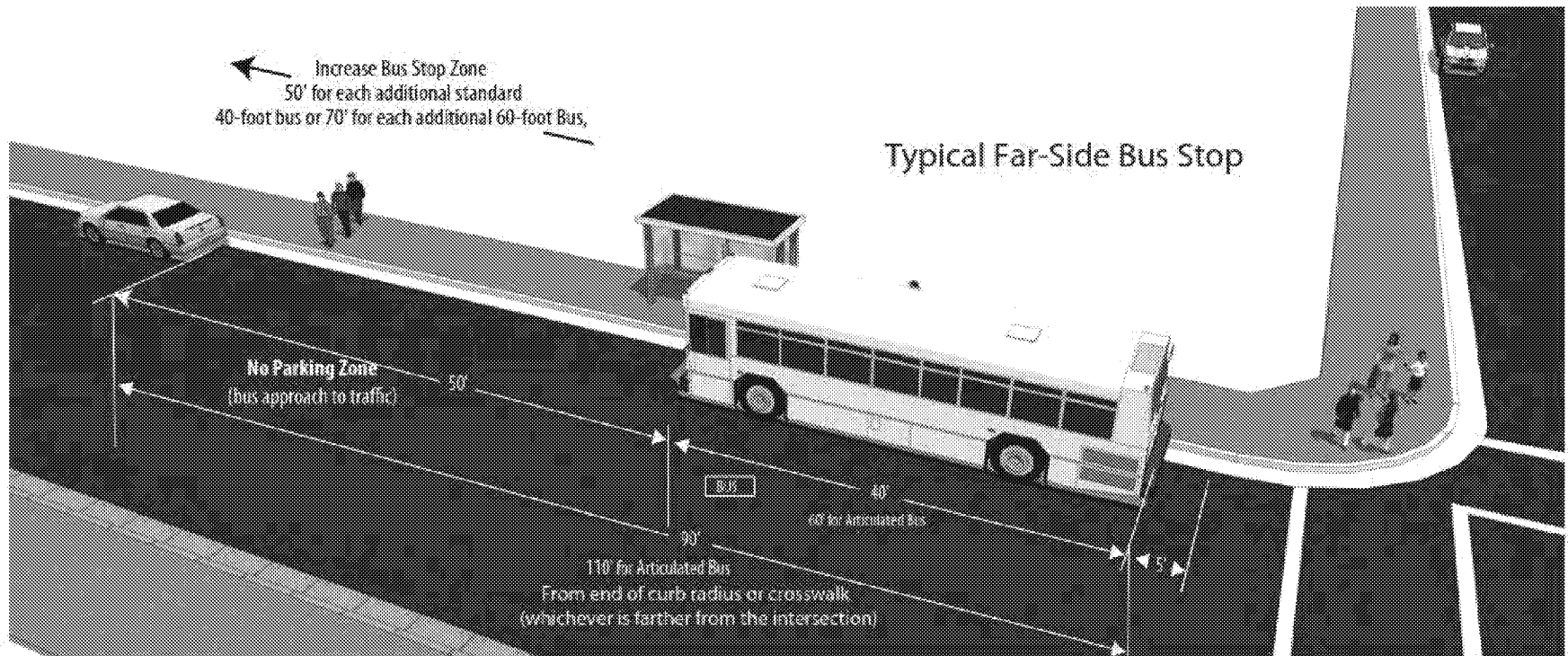


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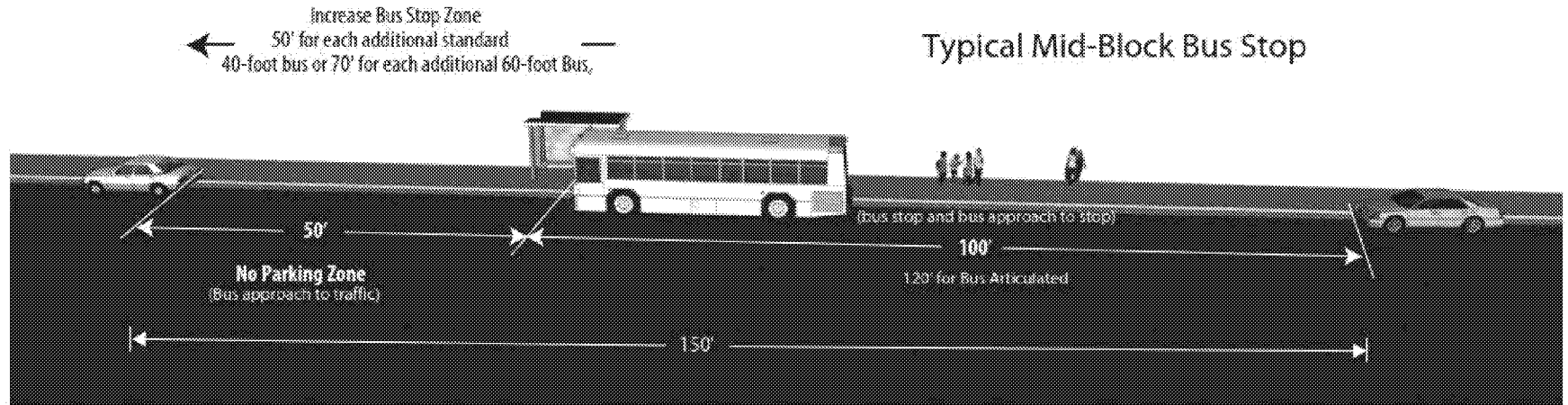
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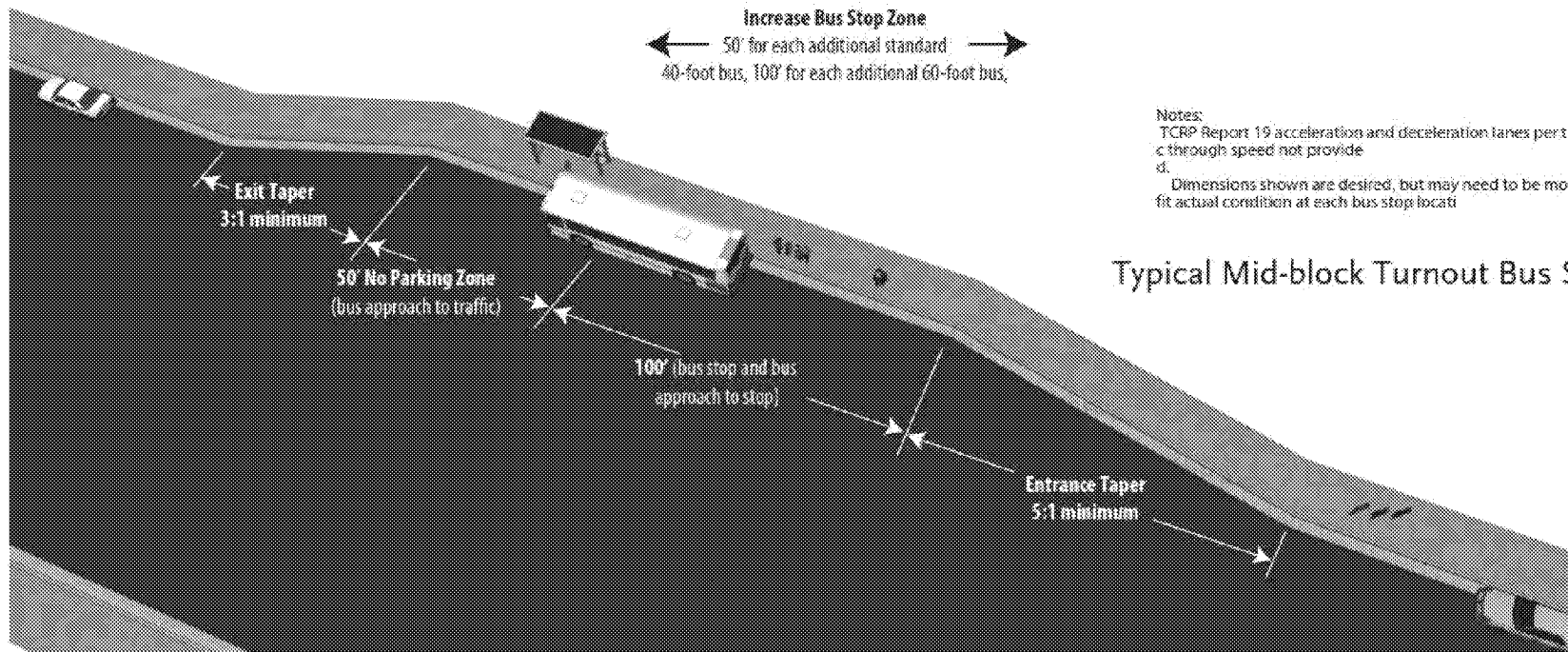




170' for Articulated Bus.



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Notes:
TCRP Report 19 acceleration and deceleration lanes per traffic through speed not provided.
Dimensions shown are desired, but may need to be modified to fit actual condition at each bus stop location.

Typical Mid-block Turnout Bus Stop

Note:
Bus baywidth is desirably 12 feet; for traffic speeds under 30 mph, a 10 foot minimum baywidth is acceptable. These dimensions do not include the gutter width.



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APPENDIX E: SCHOOL TRIPPER SERVICE CHANGE PROCEDURES

1. Service Development Managers (SDM) in the Service Planning & Scheduling Department are responsible for certifying that all school trippers in their respective service area fully comply with Metro's School Tripper Policy (Section 3.2-1). Each SDM will submit a report prior to each major service change program that details all existing and proposed school tripper service.
2. All regularly scheduled school trippers must be published on public timetables to ensure that both the general public, as well as the student population, are aware of the services.
3. School tripper "pink letters" require notification to the general public through the use of a service change notice or on Metro's webpage.
4. Uniform standards for the documentation of school tripper pink letters must be employed. This includes standardizing the pink letter form and oversight of the pink letter information being input into the SLS 2000 system to ensure accuracy. All requests for new school trippers and modifications to existing school trippers must be logged into the SLS2000 regardless if the requested new or modified school tripper is actually implemented.
5. Request for new school trippers or modifications to existing school trippers will be considered only if at least two weeks prior notice is provided to complete appropriate analysis of the request and to allow appropriate notification of changes to the general public.
6. SDMs are responsible for working with school districts in their service area which use school tripper service. For example, a specific protocol has been established with LAUSD in which their monthly Operations Coordinators' Meeting has a standing agenda item, "Metro Coordination," where special events and bell-time changes are disseminated to Metro through communication with staff and the meeting's minutes.

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APPENDIX F: LOS ANGELES COUNTY LOCAL FIXED ROUTE TRANSIT OPERATORS

Operator	Municipal	Local Return
Agoura Hills		X
Alhambra		X
AVTA	X	X
Artesia		X
Avalon		X
Azusa		X
Baldwin Park		X
Beach Cities	X	X
Bell		X
Bell Gardens		X
Bellflower		X
Beverly Hills		X
Burbank		X
Calabasas		X
Carson		X
Cerritos		X
Commerce	X	X
Compton		X
Covina		X
Cudahy		X
Culver City	X	X
Downey		X
Duarte		X
El Monte		X
El Segundo		X
Foothill	X	X
Gardena	X	X
Glendale		X
Glendora		X
Hawthorne		X
Huntington Park		X
Inglewood		X
La Puente		X
Lawndale		X
Long Beach	X	X
Los Angeles	X	X
Los Angeles County		X
Lynwood		X
Manhattan Beach		X
Malibu		X
MAX		X
Maywood		X
Monrovia		X
Montebello	X	X
Monterey Park		X

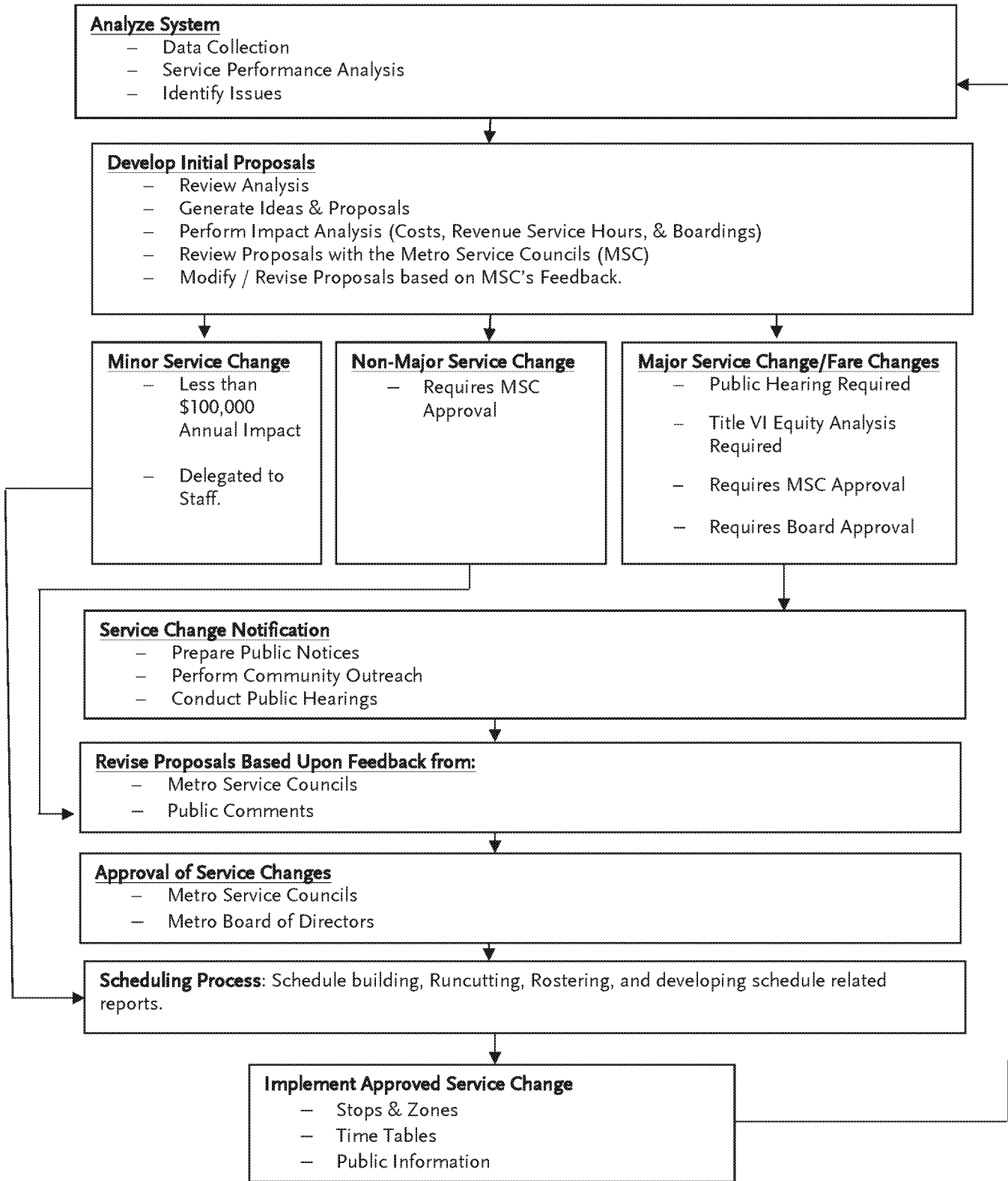
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Operator	Municipal	Local Return
Norwalk	X	X
Palos Verdes Estates		X
Paramount		X
Pasadena		X
Pico Rivera		X
Pomona		X
Redondo Beach		X
Rosemead		X
San Fernando		X
SCVTA	X	X
Santa Fe Springs		X
Santa Monica	X	X
Sierra Madre		X
South Gate		X
Torrance	X	X
West Covina		X
West Hollywood		X
Westlake Village		X
Whittier		X
Total	13	63



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APPENDIX G: SERVICE CHANGE PROCESS



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**Los Angeles County
Metropolitan Transportation Authority**

**One Gateway Plaza
Los Angeles, CA 90012-2952**

**213.922.2000 Tel
metro.net**

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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/.](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-Supplemental 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.

Comments for the Inglewood Basketball and Entertainment Center DEIR

Culver CityBus

March 2020

1. City of Inglewood and the consultant for the Inglewood NFL arena is in conversation with regional transit agencies on providing services to the proposed transit center within the Hollywood Park Specific Plan. This project should participate in this effort and coordinate with the Hollywood Park Specific Plan project team and regional transit providers on route and bus stop planning should any transit provide chose to service the proposed NBA arena.
2. The project should consider establish dedicated bus lanes to facilitate faster public transportation services and transport employees and event attendees with higher efficiency. Possible locations for dedicated bus lanes include along Prairie Avenue, Manchester Boulevard, Crenshaw Boulevard, and Century Boulevard, at least to/from freeways and/or major transit stations (Expo, Crenshaw, Green Line). Transit signal priority for buses is another option as well.
3. The design of the project facilities and nearby street configuration shall aim to prioritize the circulation of the transit vehicles and avoid conflict between transit vehicles and other vehicles going to the project site.
4. Chapter 3.14, page 198, TDM 9/Event-Day Local Microtransit Service. Please consider utilize the microtransit service so that it connects to the proposed shuttle locations at three nearby Metro stations. As the shuttle service provides higher capacity and efficiency to carry employees and attendees than minibuses.
5. Project Description page 58, Public Bus Transit. There is no mention of any street furniture at the six bus stops on South Prairie Avenue and West Century Boulevard adjacent to the project site. Proper shading from sun and rain, places to sit, and excellent wayfinding/signage should be incorporated at these bus stops if they are not already.
6. Chapter 3.14 page 50, Pedestrian Network. It is unclear based on the description how wide different sections of the sidewalks are along South Prairie Avenue and West Century Boulevard. Immediately adjacent to the project site, along South Prairie Avenue and West Century Boulevard, it is also unclear whether the "8-foot landscaped area that also contains signage and utilities" is an area that people can walk on as well if the five foot wide sidewalk gets too crowded. Five feet wide sidewalks support two people walking side by side, and eight feet wide sidewalks support two pairs of people passing each other (Boston Complete Streets Guidelines). Narrow sidewalks do not support heavy pedestrian activity and can create unsafe conditions where people walk on the street. The project should consider widening the sidewalks within the vicinity of the project site to accommodate the thousands of attendees for Clippers games and other big events. https://nacto.org/wp-content/uploads/2016/04/1-6_BT_D_Boston-Complete-Streets-Guidelines-2.4-6-Sidewalk-Widths_2013.pdf
7. Chapter 3.14 page 50, Bicycle Network. The project should also consider adding bike lanes on South Prairie Avenue and West Century Boulevard. E-scooters could also use the bike lanes as well. Creating a safer environment for bikes and e-scooters could provide first/last mile travel options for people traveling to/from the arena.

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8. Chapter 3.14 page 66, Proposed Project Land Uses, Parking Supply, and Access Provisions. The project should consider allowing bikes and e-scooters on the first floor of the East Parking Garage in addition to creating a transportation hub for TNCs such as Uber and Lyft. This could be one possible location for bike share as well.
9. Chapter 3.14 page 196, TDM 2/Event-day Dedicated Shuttle Services. In this section it says that there will be shuttle services “from the Green Line at Hawthorne Station, Crenshaw/LAX Line at AMC/96th Station, and Crenshaw/LAX Line at Downtown Inglewood station for arena events.” In Chapter 3.14 pages 95-96, Mode Split it says that “[D]uring major events, the Proposed Project would operate shuttles that transport attendees between the site and the Hawthorne Green Line Station and planned Metro Crenshaw/LAX Line station in Downtown Inglewood” without mentioning the Crenshaw/LAX Line at AMC/96th Station. The project should clarify whether there is shuttle service to the Crenshaw/LAX Line at AMC/96th Station or not during big events. Culver City Buses 6 and Rapid 6 have stops at the Green Line Aviation LAX station and the LAX City Bus Center (Metro AMC/96th station in the future), which are both regional transit connection points and close to the project. The project should consider providing shuttle services to/from the Green Line Aviation LAX station and the AMC/96th station.
10. Chapter 3.14 page 191, Mitigation Measure 3.14-1(a) TDM 1/Encourage Alternative Modes of Transportation. The project should consider providing transit subsidies for all attendees with proof of ticket purchase to encourage transit use and reduce vehicular traffic to/from the arena. This could also improve bus speeds and efficiency in getting passengers to/from the arena on time.
11. Chapter 3.14 page 191, Mitigation Measure 3.14-1(a) TDM 1/Encourage Alternative Modes of Transportation. The project’s marketing and outreach campaign should include information about all modes of transit and all legs of the trip to/from the arena, including rail, bus, shuttle service, bike, and e-scooter.
12. Chapter 3.14 page 191, Mitigation Measure 3.14-1(a) TDM 4/Encourage Active Transportation. The Project should provide more than 23 attendee bike parking spaces, considering that a sold out Clippers game would have a capacity of 18,000 fixed seats.

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**Letter Culver CityBus
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.

Letter Gabrieleno1

From: Administration Gabrieleno <admin@gabrielenoindians.org>
Sent: Tuesday, January 14, 2020 11:38 AM
To: ibecproject
Subject: Inglewood Basketball and Entertainment Center (IBEC) located in the Vicinity of the intersection of West Century Boulevard and South Prairie Avenue in the City of Inglewood
Attachments: Inglewood Basketball and Entertainment Center (IBEC).pdf; IMG_2822.JPG

please see attachments

I 1

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



Attachments area



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Project Name: Inglewood Basketball and Entertainment Center (IBEC) located in the Vicinity of the intersection of West Century Boulevard and South Prairie Avenue in the City of Inglewood

Dear Mindy Wilcox,

Thank you for your letter dated December 18, 2019 regarding AB52 consultation. The above proposed project location is within our Ancestral Tribal Territory; therefore, our Tribal Government requests to schedule a consultation with you as the lead agency, to discuss the project and the surrounding location in further detail.

2

Please contact us at your earliest convenience. **Please Note: AB 52, "consultation" shall have the same meaning as provided in SB 18 (Govt. Code Section 65352.4).**

Thank you for your time,

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
1(844)390-0787

APPENDIX 1: Map 1-2; Bean and Smith 1978 map.

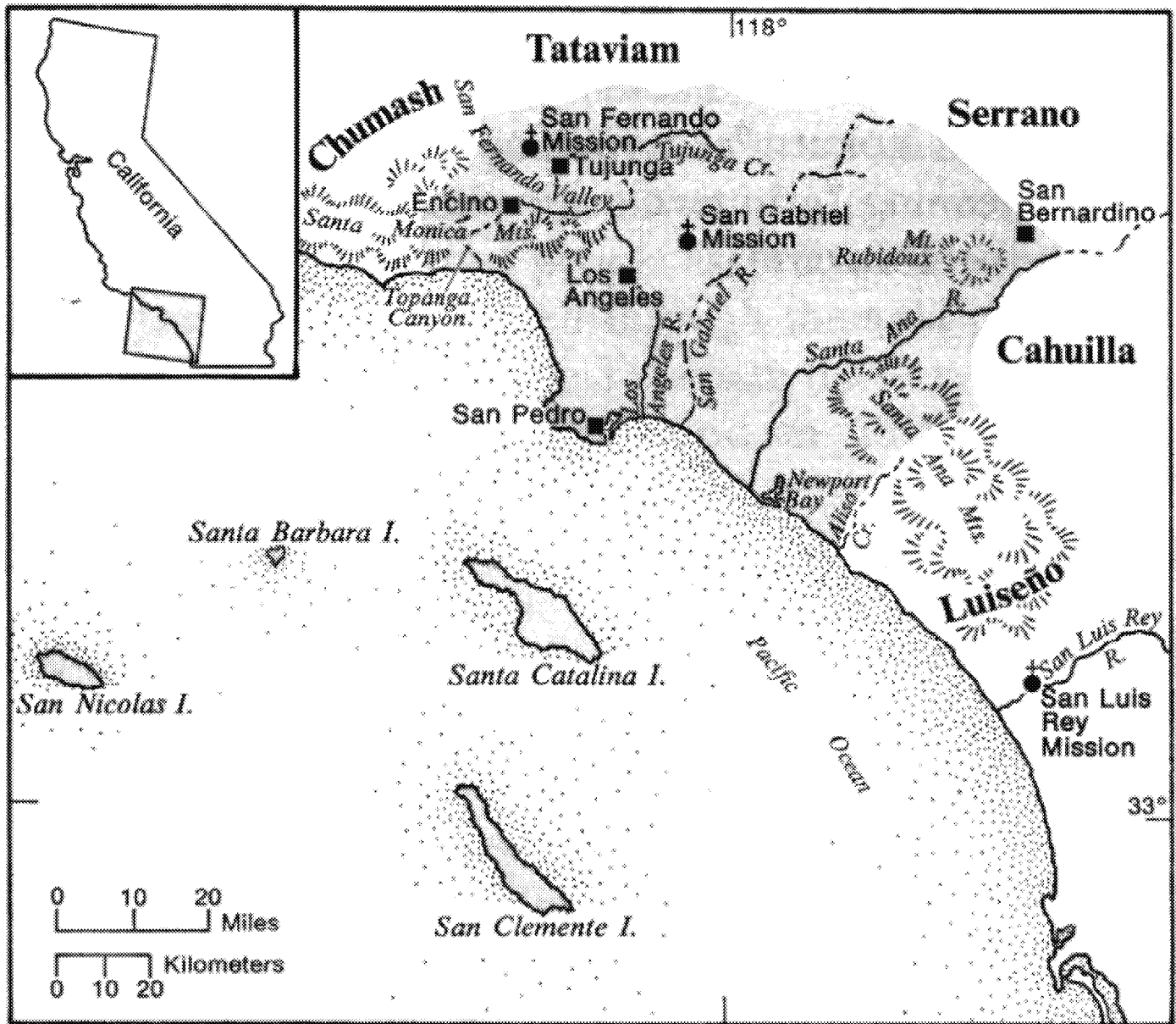


Fig. 1. Tribal territory.

The United States National Museum's Map of Gabrielino Territory:

Bean, Lowell John and Charles R. Smith
 1978 Gabrielino IN *Handbook of North American Indians, California*, Vol. 8, edited by R.F. Heizer, Smithsonian Institution Press, Washington, D.C., pp. 538-549

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

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.

Letter Gabrieleno2

From: [Gabrieleno Administration](#)
To: [ibecproject](#)
Subject: Inglewood Basketball and Entertainment Center in the City of Inglewood
Date: Monday, March 23, 2020 1:43:13 PM

Dear Mindy Wilcox,

Thank you for your letter dated March 13, 2020 regarding the project listed above. From my understanding we have already had a consultation or set up a consultation for this project. Can you please confirm if consultation has been met.

Thank you

Admin Specialist

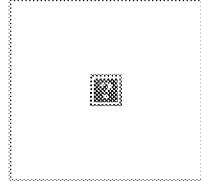
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Letter **Admin Specialist, Gabrieleno Band of Mission Indians – Kizh**
Gabrieleno2 **Nation**
Response **March 23, 2020**

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.



March 23, 2020

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

Via e-mail: ibecproject@cityofinglewood.org

**Re: Inglewood Basketball and Entertainment Center
(SCH # 2018021056) – Draft Environmental Impact
Report**

Dear Ms. Wilcox,

On behalf of PETA, I am submitting comments on the City of Inglewood’s Draft Environmental Impact Report (“DEIR”) for the proposed Inglewood Basketball and Entertainment Center (“IBEC”). The DEIR does not comply with the California Environmental Quality Act (“CEQA”) because it fails to adequately analyze the biological impacts of this project—specifically, the potential impact of the project on birds colliding with the arena. Failure to consider this issue could lead to the needless deaths of countless birds.

Bird-building collisions kill up to a billion birds every year in the United States.¹ Birds generally do not see clear and reflective glass and will careen into windows at high speeds.² Their hollow bones make them well suited to flight but largely unable to survive such collisions.³ Migratory species are especially vulnerable, in part because they are attracted to and disoriented by large, lighted buildings during their nocturnal migration.⁴

¹ S.R. Loss et al., *Bird-building Collisions in the United States: Estimates of Annual Mortality and Species Vulnerability*, 116 *The Condor: Ornithological Applications* 8 (2014).

² U.S. Fish & Wildlife Service (“USFWS”), *Reducing Bird Collisions with Buildings and Building Glass Best Practices 2* (July 2016).

³ Bird City Wisconsin, *Threats to Birds*, <https://birdcitywisconsin.org/resources/threats-to-birds> (last visited Mar. 10, 2020).

⁴ Loss et al., *supra* n.1, at 19; *see also* USFWS, *Collisions*, <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds/collisions.php> (last visited Mar. 10, 2020) (Tall structures “reach heights commonly used by bird[s] during migration movements.”).

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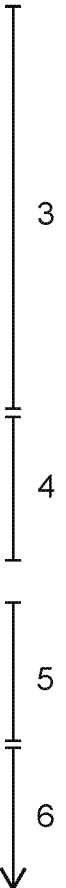
2

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To prevent or mitigate the devastating impact that buildings have on birds, architects have developed innovative designs—including films, fritted glass, ultraviolet patterned glass, and architectural features—that have successfully been adopted.⁵ For example, the Milwaukee Bucks opened the NBA’s first bird-friendly arena in 2018, which uses fritting—thin ceramic lines on glass that are visible to birds but virtually transparent to humans.⁶ The Bridge Building at Vassar installed a fritted pattern as well as Ornilux glass, which contains a patterned ultraviolet reflective coating that is likewise only visible to birds.⁷ The Javits Convention Center in Manhattan installed glass panels sprinkled with small white dots and subsequently saw a 90 percent decrease in bird deaths.⁸ The U.S. Fish & Wildlife Service’s (“USFWS”) Division of Migratory Bird Management has also compiled a list of best practices to deter collisions and recommends that buildings use “opaque, etched, or patterned glass.”⁹ Lawmakers have taken note of these developments and are beginning to adopt policies requiring their implementation in new buildings. In December, for example, New York’s City Council voted to mandate bird-friendly glass in new buildings.¹⁰



The proposed arena at the IBEC would be approximately 216 feet tall, 915,000-square feet, and “brightly lit during major spectator events.”¹¹ The project design includes interior lighting that “may be seen through transparent facets (glass or perforated materials) on the Arena Structure façade,” external LED displays, and an illuminated marquee, among other lighting and signage.¹² The project site’s Inglewood location is only a few miles from Ballona Wetlands Ecological Reserve, an important migratory rest stop for a number of species of birds.¹³ Additionally, Los Angeles is located in the middle of the Pacific Flyway, a major migratory route, and is the fourth most dangerous city for

⁵ USFWS, *supra* n.2, at 5-8.

⁶ James B. Nelson, *Fiserv Forum Deemed the World’s First Bird-friendly Sports Arena after Bucks Tweak Design*, Milwaukee Journal Sentinel (Oct. 24, 2018), <https://www.jsonline.com/story/news/local/2018/10/24/design-fiserv-forum-tweaked-make-arena-bird-friendly/1694096002/>.

⁷ Edward Gunts and James Russiello, *Richard Olcott/Ennead Architects completes bird-friendly “Integrated Science Commons” for Vassar College*, The Architect’s Newspaper (May 20, 2016), <https://archpaper.com/2016/05/richard-olcott-ennead-architects-vassar-college/>.

⁸ Lisa W. Foderaro, *Renovation at Javits Center Alleviates Hazard for Manhattan’s Birds*, N.Y. Times (Sept. 4, 2015), <https://www.nytimes.com/2015/09/05/nyregion/making-the-javits-center-less-deadly-for-birds.html>.

⁹ USFWS, *supra* n.2, at 14; *see also* U.S. Green Building Council, *LEED Pilot Credit 55: Bird Collision Deterrence* (2011).

¹⁰ Associated Press, *NYC Lawmakers Vote 43-3 to Require ‘Bird-friendly’ Glass* (Dec. 10, 2019), <https://apnews.com/f97aa6977481ebd3a0f46e7f211ac106>.

¹¹ DEIR at 2-17, 2-22, 2-54.

¹² *Id.* at 2-52 to 2-54.

¹³ Friends of Ballona Wetlands, *Field Guide*, <https://www.ballonafriends.org/field-guide-to-the-wetlands> (last visited Mar. 10, 2020).

migrating birds in the spring.¹⁴ Nevertheless, the DEIR fails to consider the potential impact a large, brightly lit arena in Inglewood would have on avian mortality.

↑ 6
| (cont.)

Bird-building collisions are a significant impact according to Criterion 4 of the DEIR’s CEQA Appendix G thresholds, which states that a significant impact occurs if the proposed project would “[i]nterfere substantially with the movement of any native resident or migratory . . . wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.”¹⁵ Moreover, Criterion 1 states that a significant impact occurs if the proposed project would “[h]ave a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service.”¹⁶ Notably, the IBEC would substantially interfere with the movement of birds and have a direct and substantial adverse effect on several of the 1,000-plus species protected by the Migratory Bird Treaty Act, which is administered by USFWS.¹⁷

| 7

Analysis of the IBEC’s impact on avian mortality is necessary both to comply with CEQA and to mitigate the loss of countless birds’ lives that could result from the proposed project’s design. We thank you for the opportunity to comment and are available to discuss our comments further.

| 8

Sincerely,



James Erselius, Esq.
Litigation Counsel
PETA Foundation
(661) 644-5398
jamese@petaf.org

¹⁴ Pat Leonard, *Chicago Tops List of Most Dangerous Cities for Migrating Birds*, Cornell Chronicle (Apr. 1, 2019), <https://news.cornell.edu/stories/2019/04/chicago-tops-list-most-dangerous-cities-migrating-birds>; Israel Lemus, *Urban Birding*, Los Angeles Magazine (Apr. 7, 2016), <https://www.lamag.com/sponsored/urban-birding/>.

¹⁵ DEIR at 3.3-11.

¹⁶ *Id.*

¹⁷ See USFWS, *Migratory Bird Treaty Act Protected Species (10.13 List)*, <https://www.fws.gov/birds/management/managed-species/migratory-bird-treaty-act-protected-species.php> (Dec. 2, 2013).

Letter PETA Response **James Erselius, Esq., Litigation Counsel, PETA Foundation**
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 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 (CHMC), approximately one-half mile to the northwest; and the City of Inglewood Civic Center that includes 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.²⁸ 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.”²⁹ 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. study³⁰ 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.³¹ 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).³² 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

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

²⁹ Los Angeles World Airports, *Airport Certification Manual, Los Angeles International Airport (LAX) Wildlife Hazard Management Plan*, December 2016, pages 337-8.

³⁰ 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.

³¹ Klem, D., Jr., 1990. Collisions between birds and windows: Mortality and prevention. *Journal of Field Ornithology* 61: 120-128.

³² 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,^{33,34,35} the percentage and height of nearby vegetation,^{36,37} and the amount of artificial night lighting emitted from windows.”^{38,39} 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.⁴⁰ 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.

Implementation of these design features would be reflected in a façade and roof structure made of translucent polymer⁴¹ panels with a pattern or metal

³³ 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.

³⁴ 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.

³⁵ 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.

³⁶ 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.

³⁷ 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.

³⁸ 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.

³⁹ Zink, R. M., and J. Eckles, 2010. Twin Cities bird–building collisions: A status update on “Project Birdsafe.” *The Loon* 82:34–37.

⁴⁰ U.S. Green Building Council, LEED BD+C: New Construction – v4.1 – LEED v4.1, *Bird Collision Deterrence*, [https://www.usgbc.org/credits/new-construction-core-and-shell-schools-new-construction-retail-new-construction-healthc-212?view=language&return=/credits/New Construction/v4.1](https://www.usgbc.org/credits/new-construction-core-and-shell-schools-new-construction-retail-new-construction-healthc-212?view=language&return=/credits/New%20Construction/v4.1), accessed May 4, 2020.

⁴¹ Translucent polymer panels would be made of either ethylene tetrafluoroethylene (ETFE) or polytetrafluoroethylene (PTFE).

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,⁴² 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 construction 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 design criteria for Building Feature-Related Hazards from the City of San Francisco Planning Department's Design Guide Standards for Bird-Safe Buildings;

⁴² Fritted glass is glass that has been fused with pigmented glass particles.

- The Arena façade and envelope composition would be made of translucent polymer¹³ panels with a pattern or metal substructure, along with opaque photovoltaic panels. The materials would be selected with 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.

(Footnote 13: Translucent polymer panels would be made of either ethylene tetrafluoroethylene (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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March 24, 2020

VIA ELECTRONIC MAIL AND PERSONAL DELIVERY

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**Re: Comments on Inglewood Basketball and Entertainment Center Draft
Environmental Impact Report; State Clearinghouse Number 2018021056.**

Dear Ms. Wilcox:

This firm represents Unite Here Local 11. The Draft Environmental Impact Report ("DEIR") fails to adequately disclose, analyze and mitigate the Project's environmental impacts. It must be revised and re-circulated to address the deficiencies identified below.

Local 11 represents more than 30,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix, Arizona. Members of Local 11, including thousands who live or work in the City of Inglewood and near the Project Site, join together to fight for improved living standards and working conditions. Local 11's members have a direct interest in seeing that the Project's environmental impact is properly assessed and mitigated in the EIR process. Our members are also significantly invested in ensuring a clear, transparent and thorough environmental review process that ensures the public participation. Unions have standing to litigate land use and environmental claims. See *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.

I. The DEIR Lacks a Sufficiently Definite Project Description to Inform Public Review.

A. The Project Description Fails to Determine the Locations of Structures, Excavation, Street Widening and Sidewalk Narrowing.



The DEIR’s Project Description fails to include essential details of the location of proposed uses and structures. Although the Conceptual Site Plan included in the Project Description illustrates generous setbacks on all sides of the proposed structures, not a single one of these setbacks is articulated in the Project Description text or dimensioned on the Conceptual Site Plan.¹ Furthermore, on the West Parking Structure, East Parking Structure and Arena Parking Structures, the Conceptual Site Plan located circulation on the perimeters of the parking structures, yet nothing in the Project Description prescribes this configuration. In fact, the only references to setbacks relate to the proposed – but unspecified – zoning text amendments and new overlay zone for the Project. The Project, therefore, would not be subject to the current yard regulations of the underlying zones, nor do members of the public have the slightest clue about the proposed yard regulations.

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Similarly, the DEIR discloses that the Project would require the export of approximately 296,915 cubic yards of soil, yet provides no proposed grading plan indicating precisely where grading work would take place.² Although members of the public could attempt to discern excavation boundaries from the cross-section in Figure 2-15, even that diagram does not identify property boundaries or adjacent structures. The noise levels of grading equipment (excavators, graders, scrapers, backhoes and cranes) are the highest noise-generators proposed during construction, rendering this information essential to an informed analysis of construction noise impacts.³

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Lacking any guidance in the thousands of pages of the DEIR, members of the public are left guessing where the Project’s structures would be located. Based on the scale of the Conceptual Site Plan, proposed building setbacks range from approximately 50 feet (on the west side of the West Parking Garage and the south side of the Arena Parking Structure) to approximately 100 feet (on the east side of the Arena Parking Structure) and 180 feet (on the west side of the Arena Parking Structure). Yet, based on the nebulous Project Description in the DEIR, the structures in fact require no setbacks and could potentially be located up to the property lines. For residents near the Project, these setbacks are among the most important aspects of the Project to understand.

5

Finally, the Conceptual Site Plan misleads the public by excluding proposed areas where the Project widens roads for turn lanes and therefore narrows sidewalk widths, such as on the east side of Prairie Avenue. Instead, members of the public must review thousands of pages of appendices for this information. This is improper because assumptions buried in appendices does not constitute a proper Project Description.

6

CEQA mandates that the DEIR provide a Project Description that is sufficiently definite to allow for meaningful public disclosure.⁴ An accurate, stable and finite Project Description is the *sine qua non* of an informed and legally sufficient EIR.⁵ The DEIR’s failure to disclose the precise locations of the structures is prejudicial because final development plans would be subject only to administrative approval by the City. Interested parties surprised by a modified

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¹ DEIR Figure 2-7, p. 2-19.

² DEIR, p. 3.2-40.

³ DEIR Table 3.11-9 and Appendix J, p. 901-903.

⁴ CEQA Guidelines § 15124.

⁵ *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 CA3d 185, 193.

Project would have no choice but to challenge the issuance of future permits. Without a more definite understanding of what physical form the Project will take, the Project definition is a moving target defying informed public comment. Members of the public cannot even begin to understand their exposure to aesthetic, air quality and noise impacts. Therefore, the DEIR fundamentally fails as an informational document.

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B. The Project Description Grossly Underestimates Required Excavation.

The DEIR discloses that grading and excavation activities are among the highest construction noise generators, yet it grossly underestimates the amount of grading required for the Project according to its own technical sources. The Project Description states, inaccurately, that “excavation depths on the Arena Site would be at a maximum of 35 feet below ground surface[.]”⁶ The Geotechnical Report, however, recommends over-excavation consisting of excavation and re-compaction of an additional 10 feet below, and even that does not account for the depths of foundations and footings for the arena.⁷ The Project Description misleads the public by under-estimating the extent of grading activities, with the associated noise and air quality impacts, by up to a third.

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C. The Inadequate Project Description Masks Aesthetic Impacts.

The DEIR fails to disclose potential aesthetic shade and shadow impacts on adjacent residential yards and rooftop solar panels. By describing only the best-case scenario with generous yards measuring up to 180 feet, the DEIR misleads the public by omitting modified Project scenarios – consistent with the DEIR Project Description – that would result in significant shade and shadow impacts. In particular:

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- *Solar Panels at 3846 West Century Boulevard.* Shifting the Arena to the east or northeast would shade the solar panels at noon during the Winter Solstice per Figure 3.1-18. According to the scale of the Conceptual Site Plan, moving the Arena just 50 feet east or northeast appears to be sufficient to shade the solar panels. Because the Arena also shades the solar structures at 3 p.m. during the Winter Solstice per Figure 3.1-19, this modification would result in more than three hours of shade and a significant impact.
- *Residence at 10204 South Prairie Avenue.* Shifting the Arena Parking Structure to the west would shade the residences and yard at 10204 South Prairie Avenue at noon during the Summer Solstice per Figure 3.1-15. According to the scale of the Conceptual Site Plan, moving the Arena Parking Structure 70 feet west appears to be sufficient to shade the solar panels. Because the Arena already shades the residence and yard at 9 a.m. during the Summer Solstice per Figure 3.1-14, this modification would result in more than three hours of shade and a significant impact.

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Therefore, the DEIR fails to provide a concrete Project Description to enable informed

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⁶ DEIR p. 2-84.

⁷ See DEIR Appendix H, p. 13, Recommendation 1 (recommending over-excavation below structures) and Appendix H, p. 14 (recommending over-excavation adjacent to structures).

environmental review. Even minor modifications to the Project, consistent with the Project Description, would result in significant shade-shadow impacts not disclosed in the DEIR.

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D. The Inadequate Project Description Distorts Analysis of Noise Impacts.

The DEIR’s failure to prescribe definite building setbacks renders its construction and operational noise analysis meaningless. As noted in the DEIR, noise levels are strongly correlated with distance between the source and the receiver, with a halving of distance increasing noise between 6 and 7.5 dBA.⁸ Even slight modifications in the locations of the proposed structures would result in undisclosed impacts and exacerbate impacts that have been partially disclosed. The following noise-sensitive receptors⁹ would experience significant noise impacts not disclosed in the DEIR:

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- *Receptors R3 and R5.* For the residences northwest and southwest of the West Parking Garage Site, the DEIR disclosed increases of 3.3 and 4.4 dBA, respectively, yet fails to disclose the assumed distance for excavation and construction. Based on the DEIR’s analysis that a halving of distance increases noise by 6 to 7.5 dBA, a reduction in the estimated 50-foot setback between the six-story parking structure and the residences would result in a significant impact over 5 dBA.¹⁰ A review of the Receptor locations in Figure 3.11-12 suggests that the distances were not properly measured to the nearest property line of the sensitive receptor.¹¹

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- *Receptor 11.* For the residences at 10204 South Prairie Avenue, the DEIR claimed no increase in ambient noise and noted it would experience only “light” daytime construction noise impacts.¹² However, because this receptor could be surrounded by construction on three sides with virtually no setback – a scenario consistent with the Project Description – this receptor could experience some of the highest construction noise levels.¹³ The plaza, outdoor stage and open-air restaurant could all be significantly closer to the receptor than assumed in the noise models.

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- *Receptors 15 and 16.* For the residences south of the Arena, the DEIR disclosed increases of between 0 and 4.7 dBA. The Conceptual Site Plan illustrated an approximate 40 feet construction setback.¹⁴ However, the Project Description does not mandate that the parking structure be set back 40 feet from the southerly property line. It would be consistent with the Project Description to develop the parking structure up to the lot line while providing for vehicular circulation within the structure. This arrangement would

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⁸ DEIR p. 3.11-7.

⁹ Receptors are identified on Figure 3.11-12.

¹⁰ DEIR Appendix J, p. 861.

¹¹ California Department of Transportation, 2013. Technical Noise Supplement. September 2013. p. 6-5.

¹² DEIR Appendix J, p. 925.

¹³ DEIR Appendix J, p. 862.

¹⁴ DEIR Appendix J, p. 863.

result in significant noise impacts based on the DEIR’s own analysis because it would result in more than a halving of distance and an increase of at least 6 dBA.

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The DEIR’s noise model also fails to account for the excavation recommendations in the Geotechnical Report and therefore assumes incorrect distances for noise modeling. For example, the DEIR assumes a 40-foot setback of all construction activities between the South Parking Structure and the property line of noise sensitive uses to the south, measured to the face of the building structure.¹⁵ This assumption directly conflicts with the Geotechnical Report recommendation for a 10-foot horizontal excavation around this structure’s footprint.¹⁶ This fundamental methodological error compromises the credibility of noise analysis for all noise-sensitive uses.

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The location of structures is even more important to understanding the effectiveness of the sound wall mitigation. As acknowledged in the DEIR, sound walls must obstruct line-of-sight between a source and a receptor to be effective.¹⁷ Consequently, moving the Project’s arena and parking structures closer to receptors would result in more noise propagating *over* noise walls and directly to receptors. Due to these flawed assumptions, the noise model in Appendix J amounts to nothing more than a mathematical sleight-of-hand with no function except to frustrate public understanding of the Project’s noise impacts. The DEIR must be re-circulated to include accurate noise analysis, disclose further significant impacts and include new mitigation measures, where appropriate, including temporary relocation of residents during construction.

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E. The DEIR Conceals Noise Impacts from Open-Air Restaurants.

The Project includes a 15,000 square feet of unenclosed rooftop restaurant area including a capacity for 1,000 people.¹⁸ The restaurant space would be open to the public on non-event days, during daytime and corporate events, and before, during and after major events. Located at the northwest corner of the Arena site, the restaurant space would be in relatively close proximity to noise-sensitive receptors at the northwest corner of Prairie Avenue and Century Boulevard, in addition to the receptor at 10204 South Prairie Avenue. The DEIR’s composite noise model for the restaurant is based on a fatally flawed assumption that restaurant patrons would use “normal” speech volumes of 58 dBA.¹⁹ This assumption is based on an erroneous application of the technical literature cited in the DEIR.²⁰ In fact, the assumed 58 dBA speech volume applies to study participants instructed to use a “normal” voice in a noise-dampening environment.²¹ The 58 dBA speech volume is almost identical to the speech volume (57 dBA) use *within an urban home* and in *nurse stations in hospitals* – environments that no reasonable person would compare to a 1,000-guest sports bar.²² The DEIR erred in relying on this faulty noise assumption because

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¹⁵ DEIR Appendix J, p. 925.

¹⁶ DEIR Appendix H, p. 14.

¹⁷ DEIR p. 6-30.

¹⁸ DEIR p. 3.11-72.

¹⁹ DEIR p. 3.11-73.

²⁰ Olsen, W. O., 1998. “Average Speech Levels and Spectra in Various Speaking/Listening Conditions: A Summary of the Pearson, Bennett, & Fidell (1977) Report”. *American Journal of Audiology*, vol. 7, no. 1059-0889, October 1998. p. 3.

²¹ *Ibid.*

²² *Id.* at 2.

a 15,000 square foot rooftop sports bar hosting 1,000 patrons is not conducive to “normal” speech volumes. Instead of “normal” speech volumes in this context, the DEIR should have assumed “raise” (65 dBA) or “loud” (76 dBA) speech volumes. The DEIR’s assumption is all the more perplexing because in other relatively calm contexts – pedestrians walking along the pedestrian bridge and pedestrians walking on the sidewalk – the DEIR assumed “raised” voice levels of 65 dBA.²³ This assumption is more realistic for the Project’s atmosphere where restaurant patrons will likely be watching sports games, cheering when points are scored, booing in response to penalties and audibly reacting to games in other respects.

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F. The DEIR Conceals Noise Impacts from the Plaza.

The Project includes an 80,000 square foot plaza adjacent to an event stage with capacity for 4,000 attendees.²⁴ Recognizing there will be “conversation and cheering” in the Plaza, the DEIR text properly describes assumed speech volume in the Plaza as “loud” (76 dBA).²⁵ The Noise Appendix model input, however, inexplicably reduces this input to 65 dBA – corresponding to “raised” speech volumes.²⁶ The analysis in the DEIR text, however, is persuasive. Because of the Plaza’s proximity to the outdoor stage and various speakers associated with the stage and the arena itself, speech volumes would increase accordingly.

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Moreover, the DEIR fails to consider the fact described in its own technical references that noise propagation is impacted by the arrangement of surrounding structures. The cone-shaped orientation of structures in the Plaza, rather than reducing noise impacts, would likely funnel noise impacts towards receptors to the northeast. Therefore, the DEIR’s technical appendix relies on an incorrect noise assumption at odds with its own analysis that underestimates the true noise impacts of the Project.

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G. The DEIR Fails to Mitigate Noise Impacts to the Maximum Extent Feasible By Failing to Enclose the Open Air Restaurants.

The DEIR acknowledges there will be significant operational noise impacts after events, increasing ambient noise levels by 10.2 dBA at residences northwest of Prairie Avenue and Century Boulevard.²⁷ The open-air restaurants are a major contributor to this significant operational noise impacts because, located at the northwest corner of the Arena site, they are the nearest noise sources to the receptor. Despite the clear connection between the 1,000-person open-air venue and the noise impacts to its northwest, the DEIR fails to impose a mitigation measure requiring that the restaurant be enclosed. Instead, the DEIR mandates preparation of an amorphous Noise Reduction Plan²⁸ that “could include” the measures identified below. Crucially, the Noise Reduction Plan is not required until prior to the first major event – it does not need to be prepared until after the Project has been constructed. Independently, this delayed mitigation leaves open the possibility that significant noise impacts would occur due to operation

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²³ DEIR Appendix J, p. 1215.

²⁴ DEIR p. 2-50.

²⁵ DEIR p. 3.11-32.

²⁶ DEIR Appendix J, p. 1214-1215.

²⁷ DEIR Figure 3.11-18.

²⁸ DEIR p. 3.11-151.

of the Ancillary Land Uses or minor events. The six²⁹ mitigation measures identified in the Noise Reduction Plan are ineffective, speculative and potentially infeasible, as demonstrated below:

- *Installation of permanent sound barriers.* This portion of the Noise Reduction Plan could not plausibly reduce noise impacts to the northeast because the Plaza entrance cannot be obstructed by solid noise walls.
- *Equip Noise Generating Equipment with Sound Enclosures.* The DEIR fails to attribute how much of the noise impacts on residences to the northeast are due to mechanical equipment. Based on the noise levels estimated in the DEIR and Appendix J, restaurant and crowd noise are the primary contributor to noise impacts to the northeast.
- *Locate Noise Generating Equipment as Far as Possible From Receptors.* There is no guarantee that it would be possible to follow through with this portion of the Noise Reduction Plan because it would not be prepared until after Project Construction.
- *Design the Outdoor Stage to Limit Noise Levels.* There is no guarantee that the outdoor stage can be “designed” to limit noise levels after it has been constructed. As shown on the Conceptual Site Plan, the outdoor stage maintains a clear line-of-sight to noise sensitive uses to the north east.
- *Utilize Sound-Absorbing Materials on Plaza Buildings.* There is no guarantee that sound-absorbing materials can feasibly be installed on the plaza buildings after they have been constructed and opened to the public. Moreover, this would only mitigate sound which reflects off the structures and would not address sound propagating through direct line-of-sight. Because the DEIR and Appendix J failed to account for noise reflecting to sensitive receptors due to the configuration of plaza structures, there is no analytical justification for this mitigation measure. The DEIR cannot subtract an impact it never included in the first place.
- *Enclose the Rooftop with a Noise Barrier Such as Glass.* Yet again, there is no guarantee that the 15,000 square-foot rooftop restaurant could be re-engineered to structurally support a glass enclosure. Nor is there any evidence that enclosure of the rooftop restaurant is theoretically sufficient to reduce significant noise impacts.

The Noise Reduction Plan constitutes ineffective and deferred mitigation. No analytical evidence supports the DEIR’s assessment that the Noise Reduction Plan would reduce operational noise impacts to less than significant levels. Instead, the DEIR commits one logical fallacy followed by another, unsubstantiated by noise modeling or even the simplest estimates of potential noise reduction. The Noise Reduction Plan is so speculative and lacking in evidentiary support that critical review by an acoustic engineer is premature at this time. Most of the

²⁹ Notably, the Noise Reduction Plan is “not limited to” the six identified measures, but could include other actions of unspecified nature and effectiveness. DEIR p. 3.11-158.

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potential measures would not address the greatest sources of noise on the residences to the east, especially the open-air sports bar. Additionally, the Noise Reduction Plan improperly defers the formulation of effective mitigation measures to a future date *after Project construction*, without demonstrating with certainty that the six potential measures would be feasible at that time or that they would successfully reduce impacts to less-than-significant levels.

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The DEIR’s deferral of the formulation of effective mitigation measures subverts the Legislature's stated purpose of CEQA, to evaluate a proposed project *before* it is approved:

The CEQA process is intended to be a careful examination, fully open to the public, of the environmental consequences of a given project, covering the entire project, from start to finish. This examination is intended to provide the fullest information reasonably available upon which the decision makers and the public they serve can rely in determining whether or not to start the project at all, not merely to decide whether to finish it. The EIR is intended to furnish both the road map and the environmental price tag for a project, so that the decision maker and the public both know, before the journey begins, just where the journey will lead, and how much they – and the environment – will have to give up in order to take that Journey.³⁰

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The DEIR must commit to definite and feasible mitigation measures to guarantee noise reductions below the level of significance. CEQA mandates that the DEIR shall include all feasible mitigation measures that would reduce significant and unavoidable impacts.³¹ Enclosing the rooftop restaurants, especially with glass, is feasible because it would continue to provide a comparable ambience while allowing full functionality of the restaurants to advance the Project objectives. Furthermore, enclosing the rooftop restaurants would meaningfully reduce the most severe operational noise impacts after events. Therefore, at a minimum, the DEIR must impose a mitigation measure requiring enclosure of the rooftop restaurants and define maximum volumes for amplified music and stage activities.

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II. The DEIR Fails to Properly Disclose and Mitigate Project Transportation Impacts.

A. The DEIR Must Analyze Transportation Impacts of Concurrent NFL and NBA Games.

The DEIR considers five scenarios consisting of concurrent events at the Project in addition to events at the nearby Forum and the NFL Stadium.³² In addition to the 18,500-seat capacity of the Project, the Forum has a capacity of 17,500 seats and the NFL Stadium has a capacity of 70,240 seats, although the DEIR asserts that routine mid-size events would fill 25,000 seats. The combined capacity of these venues is 106,240 seats – equivalent to the population of the City of Inglewood itself in an area less than two square miles.

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The DEIR asserts that no analysis of a Clippers game concurrent with an NFL football game is required, and instead analyzes Scenario 5 which staggers the NFL and NBA game times

³⁰ *Natural Resources Defense Council v. City of Los Angeles* (2002) 103 Cal.App.4th 268.

³¹ CEQA Guidelines §§ 15092(b), 15043.

³² DEIR p. 3.14-3.

throughout the day.³³ The basis for this assertion is that in three other markets where NFL and NBA venues are near each other, games have not occurred concurrently.³⁴ However, none of the stadiums in these three markets (Golden State Warriors, Philadelphia 76ers and New Orleans Pelicans) serve two NFL teams, whereas the Los Angeles NFL Stadium serves both the Rams and the Chargers. The DEIR contradicts its own logic by noting that in the 2018/2019 season, NFL and NBA events overlapped *twice* – on October 28th and December 22nd.³⁵ Based on the empirical fact that NFL and NBA games have recently been scheduled concurrently in the Los Angeles market, it is reasonably foreseeable that future games could be scheduled concurrently.

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The public has a compelling interest to know the Project’s worst-case environmental impacts. The DEIR’s failure to disclose these impacts is particularly egregious because this worst-case scenario is clearly articulated, has occurred recently and can be readily modelled from the permutations already analyzed in the DEIR. Therefore, the DEIR must analyze the transportation impacts (in addition to noise and air quality impacts) of concurrent NFL and NBA games.

B. The Project Must Incorporate Feasible Mitigation Measures to Reduce Transportation Impacts from Concurrent Events at the Project, Forum and NFL Stadium.

The DEIR provides a plausible explanation for the general lack of overlap: based on a correspondence from NBA Game Schedule Management personnel, the NBA has a process allowing teams to identify unavailable home days.³⁶ This process creates a convenient mechanism for the Project to mitigate environmental impacts of concurrent events. The Project must incorporate a mitigation measure prohibiting ticketed events at the Project on the same day as events at the Forum and NFL Stadium where the combined attendance at the Project, the Forum and the NFL Stadium would exceed, for example, 24,500. The environmental benefits of this mitigation measure cannot be overstated. The DEIR disclosed that Scenario 5 – involving same-day events with the NFL game concluded before the NBA and Forum events begin – would result in **52 intersections** in the Project vicinity operating at LOS F. Regardless of the threshold of significance for traffic impacts, this gridlock would further compromise emergency access and increases traffic-related air pollution and noise impacts.

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This proposed mitigation measure incorporates reasonable flexibility because it would permit a Clippers game (18,500 seats) in addition to a 6,000-seat performance at the NFL Stadium. This mitigation measure is feasible because the NBA provides a built-in scheduling process to avoid scheduling conflicts in advance. Finally, this mitigation measure is consistent with the objectives of the City and the Applicant because it would allow multiple events concurrently while avoiding the most environmentally impactful scenarios of multiple concurrent events.

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C. The DEIR Fails to Analyze Impacts of the Parking Structures Without Project Events.

The Project’s construction of three new parking structures including 4,125 parking spaces

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³³ DEIR 3.14-9; 3.14-361.

³⁴ DEIR 3.14-9.

³⁵ Id.

³⁶ Id.

would result in transportation impacts during NFL and Forum events, even when no events are planned at the Project. The DEIR notes that parking lots and structures in the Project vicinity are generally available to attendees of events at the Forum, the NFL Stadium and the Project. For example, attendees of an NFL game would be able to utilize parking resources at the Forum and the Project. During concurrent events at the Forum and the NFL Stadium, however, attendance would reach 89,500 seats. Given that the combined attendance of concurrent Forum and NFL events exceeds Project-only attendance by a factor of four, it is reasonably foreseeable that these combined events would result in transportation impacts comparable to, or even greater than, the impacts of events at the Project. Although the Forum and NFL Stadium may be accounted for in the environmental baseline, the Project would change the nature and geographic distribution of traffic for those venues by directing thousands of vehicles to the Project’s parking structures. The DEIR has altogether failed to address this possibility. As a result, the DEIR does not properly analyze the impacts to emergency access and underestimated the noise and air quality impacts to residents near the Project, as measured by the number of days those impacts occur.

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D. The DEIR Underestimates Pedestrian Volumes and Conceals Sidewalk Facility Impacts.

The DEIR’s sidewalk facility analysis considers only the pedestrian traffic resulting from an 18,500-person concert at the Project.³⁷ This analysis fails to consider the numerous other sources of pedestrians utilizing sidewalks in the Project area, including from residents, employees, vendors or attendees of events at the Forum or the NFL Stadium who use Project-adjacent sidewalks to return to their vehicles at the Project’s parking garages. The DEIR’s failure to include even a single additional pedestrian in its analysis conceals sidewalk facility impacts, particularly on West Century Boulevard between Prairie Avenue and Doty Avenue which the DEIR concludes would be reduced to LOS E. This portion of sidewalk is reduced to 14 square feet per pedestrian – just *one square foot* greater than LOS F and a significant impact.

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Many of the sidewalks in the Project vicinity are identified in the DEIR as measuring only 8 feet wide – woefully inadequate for the high pedestrian volumes resulting from the Project.³⁸ Some of these narrow sidewalks, such as the sidewalk on the north side of Century Boulevard between Prairie Avenue and Doty Avenue, directly abut Century Boulevard with no landscaping buffer. These portions of the sidewalk would be extremely uncomfortable for pedestrians at night after an event. The Project forces pedestrians onto a narrow, crowded sidewalk directly adjacent to a six-lane thoroughfare after events where attendees have been consuming alcohol. The only reasonable conclusion, based on the totality of these circumstances, is that the Project results in significant sidewalk impacts here. The DEIR cannot absolve itself of its obligation to disclose and mitigate this impact by blindly relying on the threshold of significance stating that the Project results in 14, rather than 13 square feet per pedestrian.

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The DEIR further fails to disclose its calculations for how it determined the Average Pedestrian Space in Table 3.14-38. Although the DEIR asserts that it has already adjusted the average pedestrian space for obstructions, including areas “where walking may feel uncomfortable” consistent with *Highway Capacity Manual* guidance, the DEIR fails to document these elementary calculations (sidewalk length multiplied by usable width, minus obstructions

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³⁷ DEIR p. 3.14-133.

³⁸ The DEIR appears to mis-state the width of sidewalks

and uncomfortable areas). The DEIR must also provide citations for its assertions that all adjacent sidewalks are 8 feet in width, as portions of sidewalks appear to be significantly narrower than 8 feet. For instance, portions of the sidewalk on the south side of Century Boulevard but outside the Project boundaries appear to be approximately 6 feet wide after subtracting the parkway. Even a slight reduction in usable sidewalk area would result in significant impacts on sidewalk facilities.

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The DEIR fails to include enforceable and effective mitigation measures to ensure that pedestrian impacts on the east side of Prairie Avenue remain less than significant. The DEIR discloses that the Project *reduces the width of the sidewalk* on the east side of Prairie Avenue from 20 feet to 8 feet due to the introduction of a northbound right-turn lane.³⁹ The DEIR concedes this would result in pedestrian flows exceeding sidewalk capacity, yet asserts that this potentially significant impact is reduced to less-than-significant levels simply by posting wayfinding signage per Mitigation Measure 3.14-2(a). This Mitigation Measure inexplicably reduces flows on this sidewalk by the exact number of pedestrians “to match its available width.”⁴⁰

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This assumption is nothing more than self-serving speculation, unsupported by any coherent logic. The Project locates shuttle and transit stops on the east side of Prairie Avenue. Even if pedestrians exit the arena through the plaza to the north, accessing transit and shuttle facilities would require travelling south on the east side of Prairie Avenue – the same portion of sidewalk the DEIR claims these pedestrians would avoid because of wayfinding. The Project Description neglects to precisely define the location of entries and exits, making it unreasonable to assume that attendees would take a significantly longer path if their shortest path of travel crosses the 101st Street crosswalk on Prairie Avenue. Furthermore, the Mitigation Measure fails to include any enforceable and objective standard, such that pedestrian flows are monitored and further mitigation is required if flow exceeds capacity. Such future mitigation would be physically impossible after the Project and its associated street improvements are constructed.

There is, in fact, an enforceable and effective mitigation measure that would avoid these impacts with certainty – maintaining a 20-foot wide public sidewalk on the east side of Prairie Avenue even after accounting for a northbound right-turn lane. This mitigation measure is feasible because the Project site consists of 28 acres and the area of required sidewalk would not exceed several thousand square feet. The Project must include this mitigation measure to properly ensure pedestrian facility impacts are reduced to less-than-significant levels.

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Based on these deficiencies, the DEIR must be revised to properly document the sidewalk level of service, disclose significant impacts on pedestrian facilities and impose mitigation measures to widen sidewalks.

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E. The DEIR Fails to Analyze, Disclose and Mitigate Transit Impacts to the Green Line.

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The DEIR analysis concedes that the Project would result in transit demand significantly exceeding capacity during major events.⁴¹ For example, Table 3.14-57 indicates that the

³⁹ DEIR p. 3.14-217.

⁴⁰ Id.

⁴¹ DEIR p. 3.14-131 and 3.14-188.

eastbound Green Line at Hawthorne/Lennox operates at only 77% of capacity without the Project (656 hourly riders and 850 hourly capacity) and 112% of capacity with the Project (953 hourly riders and 850 hourly capacity). However, the DEIR’s analysis is fatally flawed because the transit impact analysis fails to analyze the ridership surge resulting from concurrent events at the Forum, NFL Stadium and the Project. Members of the public can only speculate how inadequate the Green Line’s capacity is to handle the transit ridership associated with 106,240 visitors at the three event venues. The DEIR must explain, in human terms, the consequences if the Green Line operated at, for example, 150% of capacity. Would transit delays exceed a half hour or even longer? Would platforms be so crowded that passenger safety would be compromised? Would delays be so long that passengers would instead seek a shared ride, such as Uber or Lyft? Members of the public have no meaningful information about how severely concurrent events would degrade their transit experience.

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Furthermore, the DEIR selectively quotes from guidance from the Governor’s Office of Planning and Research that “lead agencies *generally* should not treat the addition of new transit users as an adverse impact.” The next sentence of the OPR guidance, however, recognizes that “Increased demand throughout a region may, however, cause a cumulative impact by requiring new or additional transit infrastructure.” In the case of the Project, the combined development of the Forum, the NFL Stadium and the Project result in transit demand increases so severe that a significant transit impact would result unless additional transit service is needed. In this case, the Project must disclose a significant transit impact and mitigate these impacts to the greatest extent feasible by making fair-share contributions to Metro in order to provide additional transit service.

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F. The DEIR Fails to Analyze VMT Increases from Shifted Traffic Due to Vacation.

The Project proposes the vacation of portions of West 101st and 102nd Streets. West 101st Street currently carries a volume of 1,137 and 996 weekday and weekend trips, respectively, while West 102nd Street currently carries a volume of 5,661 and 4,099 weekday and weekend trips, respectively.⁴² The DEIR recognizes that the vacation would cause existing traffic to shift to nearby roads, yet the DEIR fails to consider that residents would need to take more circuitous paths of travel compared to pre-Project conditions of a connected street grid. For example, if half of the vehicles traveling on West 102nd Street would ultimately turn south to reach their destinations, the Project would increase the length of these trips by redirecting traffic a block or two *north* before vehicles would travel *south* again to their destinations. Given the extensive daily volumes that would be redirected, even a fraction of a mile per trip would significantly increase VMT. The Project disrupts a relatively continuous public street grid south of Century Boulevard and the public is entitled to know the true costs in terms of increased VMT.

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G. The Emergency Access Analysis Misleads the Public by Asserting the Project Would Not Delay Emergency Vehicles Access.

The DEIR acknowledges significant emergency access impacts because peak congestion would increase emergency response times such that the Project would result in inadequate emergency access.⁴³ The fundamental driver of this impact is the degradation of LOS at dozens of intersections in the Project vicinity, including 57 *intersections* reduced to LOS F during

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⁴² DEIR p. 3.14-65.

⁴³ DEIR 3.14-250.

concurrent events.⁴⁴ Despite the catastrophic gridlock associated with 57 LOS F intersections in the Project vicinity, the DEIR bizarrely asserts that emergency vehicles would remain unaffected because they could use sirens or drive in opposing lanes of traffic, or because traffic control officers could erect barriers to prevent slower response times.⁴⁵ Not only does this conclusion lack any empirical or technical support, but it is at odds with the reality that LOS F intersections are very likely congested to such an extent that opposing traffic lanes are also gridlocked. It is also apparent that if a traffic control officer needs to retrieve and manually erect traffic barriers to facilitate emergency access, those emergency vehicles have already been significantly delayed. The DEIR misleads the public by claiming that emergency vehicles would not be significantly impacted by the Project.

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H. The Emergency Access Analysis Relies on Ineffective and Deferred Mitigation.

Regardless of its perplexing analysis of emergency vehicle response times, the DEIR accurately notes that personal vehicles would be substantially delayed accessing emergency services, including at Centinela Hospital Medical Center (CHMC). The DEIR claims, however, that emergency access impacts would be mitigated to less than significant levels by Mitigation Measure 3.14-14, which requires the applicant to work with CHMC to (i) provide wayfinding signage, (ii) update the CHMC website and mobile app to provide advance notice of events, and (iii) instruct traffic control officers of best practices for emergency response.

The DEIR fails to provide any substantial evidence that these three actions would reduce emergency access impacts to less than significant. Given potentially 57 LOS F intersections in the Project vicinity, no amount of wayfinding signage would result in adequate emergency access for personal vehicles traveling to CHMC. Nor would a mobile app notification be of any use to a parent rushing a child with a broken arm to the hospital. Finally, installation of traffic control barriers may be necessary as a result of the Project, but by the time barriers have been installed at an intersection to allow an emergency vehicle to proceed – through just one intersection – that vehicle has already been significantly delayed. Mitigation Measure 3.14-14 fails to include enforceable and objective performance standards to ensure that emergency access would be adequate. The Mitigation Measure is ineffective and improperly defers the formulation of actions to mitigate impacts. Emergency access impacts are significant and unavoidable notwithstanding Mitigation Measure 3.14-14.

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III. The Reduced-Size Alternative Analysis Relies on Erroneous Comparisons to Project Impacts and Misleading Analysis of Project Objectives.

A. The Alternatives Omits the Operational Noise Reduction Benefits of Removing the Open-Air Restaurants.

The DEIR analyzes Alternative 2 (Reduced Project Size Alternative) including an arena of 17,500 seats, the south garage, pedestrian plaza, west garage, replacement well and TNC parking lot. Alternative 2 excludes development of the team practice facility, sports medical clinic, team administrative offices, retail, restaurants, outdoor plaza stage, community uses and

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⁴⁴ Table 3.14-97.

⁴⁵ DEIR p. 3.14-250.

the east parking structure.⁴⁶

The DEIR misleadingly claims that noise impacts under Alternative 2 would be the substantially the same as under the Project.⁴⁷ However, the DEIR’s flimsy rationale is that Alternative 2 would only reduce traffic by 3 percent and would not alter traffic- or airport-related noise. This conclusory statement fails to acknowledge that the open-air restaurant is a major contributor to post-event operational noise impacts on residences northwest of the Project. The DEIR’s assessment can only mislead the public about the environmental merits of Alternative 2.

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B. The Transportation Analysis Fails to Mention Alternative 2 Avoids Significant and Unavoidable Impacts of Ancillary Land Uses Without Events.

The DEIR recognizes the Project would result in significant and unavoidable transportation impacts solely based on the “ancillary land uses” including as the administrative offices, medical clinic, community space, restaurant and retail uses.⁴⁸ Because they would occur on a *daily basis* regardless of other events at the Project, the Forum or the NFL Stadium, impacts from ancillary land uses are of profound significance to members of the public. Alternative 2 would avoid the significant and otherwise unavoidable transportation impacts by removing the trip generators triggering those impacts, especially retail and restaurant uses. The DEIR neglects to inform the public that Alternative 2 would avoid the *most common certain transportation-related impacts*. Therefore, it fails as an informational document by glossing over a crucial reality that would affect members of the public regularly.

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C. The Alternatives Analysis Inadequately Describes GHG Benefits of Alternative 2.

The DEIR fails to describe the extent to which Alternative 2 is environmentally preferable in terms of GHG impacts. The DEIR implausibly states that GHG emissions during construction would be substantially the same, ignoring the hundreds of thousands of square feet of building area reduced in Alternative 2, including the east parking garage, hotel, retail and office space. GHG construction emissions are amortized over a 30 year period for this analysis, and the DEIR neglected to mention the GHG savings from foregoing this construction. Nor can the DEIR rely on emissions offsets to short-circuit an informed analysis of alternatives. As a matter of information disclosure, the public is entitled to know how much of the GHG impacts of the Project would be avoided in Alternative 2. Instead, the DEIR obfuscates public understanding of the environmental benefits of Alternative 2 by simply assuming the scenarios are equivalent after offsets.

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D. Noise Impacts Under Alternative 2 Are Not Greater than Project Impacts.

The DEIR asserts that Alternative 2 would result in greater noise impacts because sensitive receptors northwest of the arena would not be buffered by intervening structures. This conclusion is untenable because the intervening structures – especially the 15,000 square-foot rooftop sports bar – are themselves significant sources of noise impacts. Furthermore, the Project

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⁴⁶ DEIR, Table 6-1.

⁴⁷ DEIR p. 6-27.

⁴⁸ DEIR Table 3.14-15 (significant and unavoidable LOS impact) and Table 3.14-40 (significant and unavoidable VMT impact).

maintained a direct line-of-sight between the sensitive receptors and noise sources such as the retail and the arena itself.⁴⁹ No substantial evidence supports this statement.

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E. Transportation Impacts Under Alternative 2 Are Not Greater than Project Impacts.

The DEIR’s analysis of transportation and circulations is incomplete and misleading. The DEIR states that “few of the [transportation] impacts of the Reduced Project Size Alternative would be more severe” than Project impacts.⁵⁰ This statement has no function other than to misinform the public, because in fact Alternative 2 reduces both most common transportation impacts (those associated with Ancillary Land Uses) and most severe impacts (those associated with concurrent events). The DEIR notes that Alternative 2 might not reduce these impacts to less-than-significant levels, but it is patently false to state that the impacts are not reduced with respect to VMT, LOS and emergency access. Furthermore, the DEIR’s analysis is not supported by any model runs and therefore consists solely of unsubstantiated speculation in direct conflict with the DEIR’s own analysis, for example, identifying significant impacts from Ancillary Land Uses.

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The DEIR further deceives the public by stating 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.”⁵¹ In fact, Alternative 2 is *more consistent* with applicable General Plan Goals than the Project as summarized below:

<u>Comparison of General Plan Consistency – Alternative 2 Versus Project</u>	
General Plan Goal⁵²	Comparative Analysis
Goal: 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	Alternative 2 provides for orderly development of the City while preserving the diversity of its parts by facilitating development of the arena while maintaining the livability of adjacent residential uses. In contrast, the Project provides for excessive commercial intensification in a manner that compromises the needs of adjacent residents by causing excessive noise, transportation and other impacts. Alternative 2 is therefore superior with respect to this Goal.
Goal: Help promote sound economic development and increase employment	Alternative 2 promotes sound economic development and increases employment

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⁴⁹ See Figure 2-7 (Conceptual Site Plan) illustrating a 200-foot wide clear line of sight between the sensitive receptors northwest of the arena and the stage, retail and arena.

⁵⁰ DEIR p. 6-30.

⁵¹ DEIR p. 6-30.

⁵² City of Inglewood, City of Inglewood General Plan, Land Use Element, updated 2016. Available: <https://www.cityofinglewood.org/DocumentCenter/View/132/Land-Use-Element-1980-Amended-1986-2009-2016- PDF>.

<p>opportunities for the City’s residents by responding to changing economic conditions.</p>	<p>opportunities for the City’s residents by facilitating development of the arena. Alternative 2 promotes “sound” economic development because it appropriately balances the employment needs of the City with the profound environmental impacts associated with development of the Project. Event attendees would continue to patronize local businesses, further supporting employment opportunities in the City. The DEIR asserts Alternative 2 would reduce “non event” employment, yet fails to note that events of some size are proposed 243 days of the year.⁵³ The public can only guess what the true difference in employment would be. Alternative 2 is therefore superior with respect to this Goal.</p>
<p>Goal: Safeguard the City’s residential areas from the encroachment of incompatible uses</p>	<p>Alternative 2 better safeguards the City’s residential areas from the encroachment of incompatible uses by reducing the operational noise and transportation impacts associated with the Project. In particular, residences to the northwest of the arena would significantly benefit from the removal of the Project’s 15,000 square foot open-air sports bar and its associated operational noise impacts. Alternative 2 is therefore superior with respect to this Goal.</p>

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Finally, the DEIR falsely states that Alternative 2 would result in “increased VMT” because it would not consolidate LA Clippers uses, which would “exacerbate the generation of air pollutants, GHG emissions, congestion and other such effects at a regional level.⁵⁴ This statement appears intended to mislead the public because the DEIR elsewhere concedes that Alternative 2 would result in reduced VMT.⁵⁵ The DEIR fails to substantiate this conclusion with any model analysis, nor does it even attempt to estimate the VMT reduction by co-locating these facilities by identifying trip origins or distances. In fact, the DEIR concludes that consolidation would reduce per-employee VMT from 18.6 to 15, accounting for only 5,694 weekday VMT total (not a reduction of 5,694 VMT). The increased VMT of the retail, restaurant and hotel components dwarf this reduction, and the hotel *alone* increases VMT from 1,087 to 4,057.⁵⁶ The

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⁵³ DEIR Table 2-3.

⁵⁴ DEIR p. 6-30.

⁵⁵ DEIR p. 6-29, identifying reduced impacts associated with ancillary uses and hotel.

⁵⁶ DEIR p. 3.14-244 and Table 3.14-40

DEIR further fails to calculate the VMT reduction due to 150 hotel guest rooms located in walking distance, although again this reduction is likely to be a rounding error given the scope of the remainder of the Project. Moreover, 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.⁵⁷ Rather than drive to more-distant destinations, it is more likely that attendees would walk to nearby existing and proposed food and drink establishments.

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Furthermore, the reductions in VMT due to facility consolidation would likely be minimal because few trips are likely to be made between the arena, administrative offices and practice facilities on event days. In the event that large groups of employees are traveling between these facilities (for example, between practice facilities and the arena), it is reasonable to assume that employees would carpool or use shared transportation such as a charter bus. Crucially, the applicant is the only party able to provide information to inform this discussion because members of the public are not privy to the details of the Clippers’ logistical operations, yet the DEIR withholds this essential information and instead relies on unsubstantiated, misleading and self-serving conclusions.

F. Alternative 2 Meets Primary Project Objectives While Reducing Significant Impacts – A Statement of Overriding Considerations is Improper.

The DEIR concludes that Alternative 2 does not meet various Project objectives. As shown in the table below, this assessment is unsupported by substantial evidence and even conflicts with analysis elsewhere in the DEIR.

<u>Analysis of Project Objectives – Alternative 2 Versus Project</u>	
Objective	Comparative Analysis
City Objective 2 (economic development)	The DEIR asserts Alternative 2 would only partially meet this Objective because it would not develop additional retail, office, clinic or practice facilities. However, the DEIR 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. Alternative 2 meets this objective because the vast majority of economic development benefits are derived from events.
City Objective 4 (strengthen community)	Alternative 2 includes an outdoor plaza that would function as a community gathering space. Alternative 2 substantially meets this objective.

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⁵⁷ Phase 1 of the Hollywood Park Specific Plan development includes 107,357 square feet of restaurant and 49,785 square feet of quick food restaurant in addition to a grocery store and hundreds of thousands of square feet of retail. See Table K.2-R. Table K.2-S further identifies dozens of proposed commercial developments in the Project vicinity.

City Objective 7 (employment)	Alternative 2 meets this objective because it requires construction of the arena and associated structures and allows events 243 days per year, generating similar employment opportunities for most of the year.
City Objective 10 (environment)	The DEIR claims that Alternative 2 is “less environmentally conscious” than the Project because it does not consolidate Clippers facilities resulting in increased transportation-related impacts. As discussed above, this conclusion is demonstrably false and misleading.
Applicant Objective 1e (visitor-friendly environment)	Alternative 2 substantially meets this Objective because it promotes a visitor-friendly environment by facilitating development of an arena for 243 annual events in proximity to hundreds of thousands of square feet of visitor-serving commercial uses.
Applicant Objective 1f (economic development)	Alternative 2 meets this objective by facilitating development of the arena and its associated economic activity.
Applicant Objective 2d (maximize profits)	Alternative 2 does not meet the Applicant’s Objective 2d which essentially amounts to maximizing private profit. The DEIR fails to articulate any rationale why development of Alternative 2 would not be financially viable considering the enormous financial resources wielded by NBA franchises.



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Given the analysis above, the DEIR’s comparison of Alternative 2 to the Project is fatally flawed. In fact, Alternative 2 substantially meets all the Project objectives except Applicant Objective 2d to maximize private profits. Alternative 2 entirely avoids or significantly reduces the Project’s most severe and most recurring environmental impacts on residents in the Project vicinity, including transportation and noise impacts. Alternative 2 captures virtually all the economic development benefits of the Project because the Project vicinity has ample existing and proposed visitor-serving uses, even if those uses are located north of Century Boulevard in HPSP rather than within the Project.

Fundamentally, the decision before the City is whether the objectives of the Applicant that are not met by Alternative 2 (consolidation of facilities and maximizing private profits) are given such weighty consideration they justify the severe additional environmental impacts of the Project. There is no public interest in consolidating Clippers facilities, except to the extent that consolidation results in *net* environmental benefits – which it does not. Nor is there a public interest in maximizing the Applicant’s profits for a development that would already be financially viable. Any statement of overriding considerations, therefore, would be uninformed and improper.

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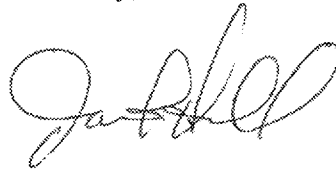
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IV. Conclusion.

For the reasons identified herein, the DEIR must be revised and recirculated to properly disclose and mitigate the Project's significant environmental impacts. I may be contacted at 310-982-1760 or at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

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Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall

**Letter
Channel
Response**

Jamie T. Hall, Channel Law Group, LLP
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- 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.⁴³ 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 an 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.

⁴³ 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,⁴⁴ 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.⁴⁵ 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.

⁴⁴ City of Inglewood Municipal Code, Chapter 12, Article 7.1, Section 12-24.12, and Article 11.1, Section 12-32.13.

⁴⁵ 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 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. There may be some minor variation in the precise metrics of the final designed buildings, these variations would likely be measured in a few feet or inches, and 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.

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.⁴⁶ As stated on page 3.11-64 of the Draft EIR, under Methodology and Assumptions, the calculated

⁴⁶ 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, are presented in Draft EIR, Appendix J, Noise, page 925.

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 worst-case construction noise analysis.

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) are 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 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, 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 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.

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 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 considered and refined Mitigation Measure 3.11-2(a) to include performance standards and other features to ensure implementation of all feasible mitigation. The Plan would include a glass enclosure that 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 at any noise-sensitive receptor 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 implementation and verification 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.

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:

- Construction 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 at any noise-sensitive receptor.
- 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. These measures are reasonably calculated to achieve the noted performance standards, and materials to implement the measures are commercially available.

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 is shown in Draft EIR, Appendix J. As described above, the revised Mitigation Measure 3.11-2(a) would require the project applicant to “[d]esign and install noise generating mechanical equipment, 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.”

- *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.

- 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 structures where appropriate and effective to reduce noise levels at adjacent off-site sensitive receptors.” 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, directivity, orientation, number of speakers, and/or maximum volume) so as to limit noise levels near 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 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 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 be 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.

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 foot (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 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.

Also, Mitigation Measure 3.11-2(a) clearly identifies that a Construction Noise Reduction Plan would be developed and approved prior to the issuance of 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 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.

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, requiring that any amplified sound system, equipment, and/or structures in the Plaza be designed to ensure that aggregate noise from mechanical and amplified sound result in noise levels of no greater than 3 dBA over ambient conditions (1-hour Leq) at any noise sensitive receptor during major event pre- and post-event conditions.

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, for arenas hosting both NHL and NBA teams. 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.⁴⁷ 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 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, which may allow for better information sharing and coordination on event scheduling at the two venues.

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

- 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.
- 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-26.⁴⁸ 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.
- 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).
- 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

⁴⁸ Memorandum from David Stone, Stone Planning, to Mindy Wilcox, City of Inglewood. Re: IBEC and Proposed Attendance Restriction, May 21, 2020.

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.⁴⁹ The amount of available parking identified in applicable reports cited below (3,600 spaces) is comparable to the amount of parking that 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 for stadium parking was identified in 2015 in connection with the Champions initiative.

In order to be sensitive to the project context in which events at the nearby 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

⁴⁹ 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 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.

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 CHMC, 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.⁵⁰ 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

⁵⁰ Transportation Research Board, *Highway Capacity Manual, Sixth Edition: A Guide for Multimodal Mobility Analysis*, November 2016.

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 Plans⁵¹ 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 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.

⁵¹ AECOM, *Plans for Improvement of Century Boulevard Inglewood Ave to Doty Ave.*, March 2018.

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, even 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 find 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 ($320 \times 50\% \times [610 \text{ feet} + 1,320 \text{ feet}] / 5,280 \text{ feet}$).

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 "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. Further, in a comment specific to congestion on streets immediately surrounding the CHMC, 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.

The Draft EIR Table 3.14-60 includes information on the LOS F intersections located within the project vicinity under a scenario that would occur numerous times per year consisting of a Major Event at the Proposed Project, as compared to the very infrequent concurrent event. 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 that are most appropriate to examine are those that are located on arterial roadways, which are most likely to be used by emergency vehicles. Based on these criteria a total of 54 study intersections are relevant for consideration. 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 that would affect access to CHMC 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.⁵² 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

⁵² Mohammad A. Naser, Centinela Hospital Medical Center, Chief Operating Officer/Interim Chief Executive Officer, Letter to Mindy Wilcox, Planning Manager, City of Inglewood, August 21, 2019.

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 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. Although the 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 2,⁵³ 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 (NO₂), 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 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.

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

⁵³ 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 use of temporary, mobile sound amplification systems. Thus any decrease in noise due to the removal of the rooftop restaurant 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.

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 CHMC 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 CHMC 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 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 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.⁵⁴ One notable example is Staples Center in downtown Los Angeles, where LA Live was developed as a 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, restaurant, 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

⁵⁴ Keith Schneider, *The New York Times*, *Welcome to the Neighborhood: America’s Sports Stadiums Are Moving Downtown*, January 29, 2018.

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.



March 24, 2020

Mindy Wilcox, AICP, Planning Manager
City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, A 90301
lbecproject@cityofinglewood.org

Re: Comments on the Draft Environmental Impact Report for the Inglewood Basketball and Entertainment Center (IBEC), SCH 2018021056

Dear Ms. Wilcox:

On behalf of the Natural Resources Defense Council and our members in Inglewood and throughout California, we submit the following comments on the Draft Environmental Impact Report (DEIR) prepared for the basketball arena project proposed by applicant Murphy’s Bowl on behalf of the Clippers Basketball team (the “Project”).

1

Introduction

As a preliminary matter, we note that the Project is materially different from that approved by CARB under AB 987. This is so because the projected GHG emissions for the Project are much higher and there is less in the way of mitigation proposed. In short, net operating GHG emissions increased by 63% comparing the DEIR to the AB 987, to 496,745 MTCO2e from 304,683 MTCO2e, while proposed mitigation measures are not as robust. Accordingly, the timing and other project proponent benefits of AB 987 should not apply to the Project.

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In addition, the Project relies heavily on statements of overriding considerations to mask the 41 significant adverse environmental impacts that ostensibly cannot be mitigated to insignificance. This is ludicrous in connection with a project that has little or no social utility for the residents of Inglewood who will bear the brunt of these impacts – including more air pollution in an already heavily-polluted area – and who are not the target audience for expensive professional basketball tickets.

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Inadequacies in the DEIR

A. Failure To Address Environmental Justice Impacts.

There is no analysis of environmental justice throughout entire DEIR, except for two passages claiming that no analysis is needed: DEIR p. 3.2-16: “As described above, in general CEQA does not require analysis of socioeconomic issues such as gentrification, displacement, environmental justice, or effects on “community character.” And 3.14-56: “There are no applicable federal regulations that apply directly to the Proposed Project. However, federal regulations relating to the Americans with Disabilities Act, Title VI, and Environmental Justice relate to transit service.”

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This is incorrect because, among other things, there is a significant federal approval needed for the Project in the form of an FAA approval because Of the Project’s proximity to Los Angeles International Airport. Moreover, the California Attorney General has opined that local governments have a role under CEQA in furthering environmental justice; see https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf (accessed March 20, 2020). The remedy for this failure is recirculation of a DEIR that includes an environmental justice analysis.

B. Use Of Improper GHG Baseline

In its initial application under AB 987, the Project proponent attempted to increase the GHG CEQA baseline by assuming that the venues from which events would move to the Project would remain unused forever on the dates of the transferred events. After pushback from CARB and others, including NRDC, the Project proponent abandoned this irrational approach and conceded that the venues would be in use on those dates.

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But the original theory has resurfaced in the DEIR. Having obtained the benefits of AB 987 by changing its initial (unjustified) position, the Project proponent should not now be allowed to revert to that position in order to raise the CEQA baseline and reduce its GHG mitigation requirement.

C. Failure To Properly Analyze And Mitigate GHG And Air Quality Impacts

The South Coast air basin is in extreme nonattainment for ozone, with a 2024 attainment deadline. Failure to meet the attainment deadline can lead to federal sanctions that will effectively shut down the local economy. The South Coast AQMD

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NRDC

plan to reach ozone attainment relies on an enormous level of reductions in oxides of nitrogen (NOx), mostly from mobile sources such as cars and trucks. But the Project’s projected emissions go in the opposite direction and the DEIR fails to require sufficient mitigation.

The DEIR admits this. For example,

Impact 3.2-1: Construction and operation of the Proposed Project would conflict with implementation of the applicable air quality plan.

Impact 3.2-2: Construction and operation of the Proposed Project would result in a cumulatively considerable net increase in NOx emissions during construction, and a cumulatively considerable net increase in VOC, NOx, CO, PM10, and PM2.5 during operation of the Proposed Project.

Impact 3.2-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would result in inconsistencies with implementation of applicable air quality plans.

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In addition, the DEIR bases its calculations of criteria pollutants from motor vehicles on the EMFAC 2017 model developed and maintained by the California Air Resources Board (CARB). But EMFAC 2017 is now obsolete because the federal government has purported to rescind the EPA waiver for California’s zero-emission vehicle program, and that program’s effects are baked into EMFAC 2017. The result is that EMFAC will underreport emissions. That problem will be exacerbated when, as expected, NHTSA promulgates the so-called SAFE rule which will reduce the corporate average fuel emission (CAFE) standards in California and nationwide. This change, which is not reflected in EMFAC 2017, will make the projections in the DEIR substantially too low. This problem is true for transportation-related GHG emissions as well because the zero-emission waiver revocation and lower fleet mileage requirement will result in more GHGs from cars and trucks than the DEIR and EMFAC 2017 assume. Thus, the DEIR underreports projected criterial pollutant and GHG emissions, and that problem will get worse over time.

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D. *Failure To Implement All Feasible Air Quality and GHG Mitigation*

Even if the DEIR air quality and GHG projections were accurate, which they are not, the mitigation measures in the DEIR are inadequate, especially given the number of ostensibly unmitigatable impacts.

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For example, the Project could and should require:

Shuttle buses should be zero-emission vehicles, starting on Day 1. ZE buses are available today from a number of vendors, including BYD in Los Angeles County.

The emergency generators should be electrically powered, and the Project should install more solar panels, and storage for solar power, to power them.

Aspirational mitigation measures and “incentives” to reduce emissions of NOx should be replaced with mandatory measures. The DEIR adopts Mitigation Measure 3.2-1(d), requiring the Project to provide “[i]ncentives for vendors and material delivery trucks to use ZE or NZE trucks during operation.” (DEIR, p. 3.2-71.) Similarly, Mitigation Measure 3.2-(c)(3) only requires the Project to “shall strive to use zero-emission (ZE) or near-zero-emission (NZE) heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB’s adopted optional NOX emissions standard of 0.02 g/bhphr.” (DEIR, p. 3.2-88.) In contrast, Mitigation Measure 3.2-2(c) specifies that use of Tier 4 off-road diesel-powered equipment rated at 50 horsepower or greater “shall be included in applicable bid documents, and the successful contractor(s) shall be required to demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities.” (DEIR, p. 3.2-88.) There is no showing in the DEIR that making Measures 4.3-1(d) and 3.2(c)(3) is infeasible. Given the significant impact on the AQMP, either such a showing of infeasibility must be made and supported by substantial evidence, or the measures must be made mandatory.

Electric vehicle parking for the Project must be provided. The electric vehicle parking needs to conform with applicable building code requirements in place at the time of construction. Electric vehicle charging stations must be included in the project design to allow for charging capacity adequate to service all electric vehicles that can reasonably be expected to utilize this development.

Each building should include photovoltaic solar panels.

The Transportation Demand Management (TDM) program must be revised to quantify the criterial pollutant and GHG reductions expected from the TDM measures.

The GHG reduction plan also must be revised so as not to defer development of mitigation measures, and to quantify the measures selected.



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As it stands, the exact content of the GHG Reduction Plan cannot be known from reading the DEIR. Further, the DEIR states that the GHG reductions will Reduction Plan will be modified in a Verification procedure if there are shortfalls in GHG reductions, providing that the methodology for the modification “shall include a process for verifying the actual number and attendance of net new, market-shifted, and backfill events.” (DEIR, p. 3.7-64.) That process is unacceptably vague and indeed the verification process may itself be subject to CEQA as a discretionary project.

Purchase and use of GHG offsets must meet CARB standards for cap and trade offsets. The DEIR’s entire description of this potential mitigation measure is:

Carbon offset credits. The project applicant may purchase carbon offset credits that meet the requirements of this paragraph. Carbon offset credits must be verified by an approved registry. An approved registry is an entity approved by CARB to act as an “offset project registry” to help administer parts of the Compliance Offset Program under CARB’s Cap and Trade Regulation. Carbon offset credits shall be permanent, additional, quantifiable, and enforceable.

Having a CARB-approved registry is not the same thing as requiring CARB-approved offset credits, which are limited in scope and strictly regulated. The residents of Inglewood should not be subjected to a lesser standard.

Additional local, direct measures that should be required before offsets are used include the following:

1. Urban tree planting throughout Inglewood.
2. Mass transit extensions.
3. Subsidies for weatherization of homes throughout Inglewood.
4. Incentives for carpooling throughout Inglewood.
5. Incentives for purchase by the public of low emission vehicles.
6. Free or subsidized parking for electric vehicles throughout Inglewood.
7. Solar and wind power additions to Project and public buildings, with subsidies for additions to private buildings throughout Inglewood.
8. Subsidies for home and businesses for conversion from gas to electric throughout Inglewood.



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- 9. Replacement of gas water heaters in homes throughout Inglewood.
- 10. Creation of affordable housing units throughout Inglewood.
- 11. Promotion of anti-displacement measures throughout Inglewood.

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E. *Displacement Will Be Accelerated By The Project And Must Be Mitigated*

The economic activity and growth inducing impacts created by the Project will foreseeably result in displacement of current residents while rents increase and rental units are taken off the market to be put to alternative uses. However, the DEIR denies that indirect displacement will occur. (DEIR 3.12-16 to -17.)

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California courts have acknowledged the human health impacts of proposed actions must be taken into account, *e.g. Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1219–1220; *see also* CEQA Guidelines § 15126.2 subd. (a) [EIR must identify “relevant specifics of ... health and safety problems caused by the physical changes.”]). Human health impacts from displacement are real and are not merely speculation or social impacts. There have been numerous cases where health effects to people were inadequately analyzed. (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 81, 89 [EIR inadequately addressed health risks of refinery upgrade to members of surrounding community]; *Bakersfield Citizens for Local Control, supra*, 124 Cal.App.4th at 1219–1220 [EIR was inadequate because it failed to discuss adverse health effects of increased air pollution]). Here, the DEIR needs to address the effects on the environment and human health reasonably foreseeable as results of construction and operation of the Project.

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Conclusion

The DEIR must be revised and recirculated to account for its many deficiencies.

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Thank you for your consideration.

David Pettit
Senior Attorney
Natural Resources Defense Council
1314 2nd Street
Santa Monica, California 90401

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

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

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

The Draft EIR analysis provides a year-by-year comparison that accounts for the anticipated change over time in CO₂e emissions intensity factors for electricity (due to the Renewables Portfolio Standard) and mobile sources due to State and federal regulations for vehicle efficiency. In other words, the baseline is adjusted annually. As a result, the Draft EIR analysis indicates that the baseline emissions of the Proposed Project in the first full year of operation are approximately 3,200 lower than AB 987’s static baseline, and this annual difference increases over time, to nearly 6,300 by year 2054. Over the 30-year analytical life of the Proposed Project, this difference results in the Draft EIR baseline GHG emissions being approximately 166,000 MT CO₂e lower than the 30-year baseline emissions under the AB 987 analysis, which represents the vast majority of the difference cited in the comment. Because the Draft EIR uses a lower figure to represent “baseline emissions,” the Draft EIR concludes that the net new emissions of the Proposed Project would be higher by a like amount. That, in turn, means that the Proposed Project must provide more mitigation in order reduce Proposed Project emissions to less than the “no net increase” significance threshold. The effect of the City’s approach, as reflected in the EIR, is to increase the Proposed Project mitigation obligations to achieve a less-than-significant impact under the no-net-increase threshold.

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

The AB 987 certification process resulted in specific commitments to local direct GHG emission reduction measures which, if the Proposed Project is approved, are required to be imposed as conditions of approval. Mitigation Measure 3.7-1(b) does not specifically mandate these particular measures, because it was not required to do so under CEQA in order to achieve net zero emissions, which would reduce Impact 3.7-1 to insignificance. Mitigation Measure 3.7-1(b) is consistent with the AB 987 reduction measures, and both

Mitigation Measure 3.7-1(b) and the AB 987 commitments are intended to achieve net zero emissions under their respective methodologies.

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

NRDC-3

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

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

As defined in CEQA Guidelines section 15002(f), an EIR is the public document used by the governmental agency to analyze and disclose the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid the possible environmental damage. The Draft EIR and Final EIR are not decision documents and do not approve or provide support or opposition to the Proposed Project. The Draft EIR identifies significant and unavoidable environmental impacts that are likely to result from the Proposed Project in the following places:

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

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

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

CEQA Guideline section 15092(b)(2)(B) specifically recognizes that a public agency may determine that unavoidable significant impacts are acceptable in light of other benefits that are created by the project. In this way, CEQA recognizes that environmental impacts are one of a number of factors that may be considered by an agency in deciding whether to approve a proposed project, and reflects that it is within the discretion of the City to determine whether to approve the Proposed Project. CEQA Guidelines section 15093(a) states:

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

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

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

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

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

In addition, the project applicant and the City have negotiated a “public benefits” package of \$100 million. If the Proposed Project is approved by the City Council, these benefits would include up to \$80 million in programs for the

construction of affordable housing and assistance for first-time homebuyers and renters; the balance of \$20 million would fund programs for students, families and seniors. The elements of this package would be part of the entitlement package presented to the City Council for its consideration.

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

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

In addition, as is identified in Table 2-3, on page 2-50 of the Draft EIR, LA Clippers basketball games would make up only 48 of the annual events at the proposed Arena, with another 188 anticipated events including concerts, family shows, other sporting events, and corporate or community events. Further, the Proposed Project would include a variety of other uses that would be accessible to local residents, including an outdoor plaza. (see Table 2-2, on page 2-18 of the Draft EIR).

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

NRDC-4

The comment raises questions about a range of issues, including environmental justice, gentrification and displacement, the applicability of National Environmental Policy Act (NEPA) to FAA actions related to the Proposed Project, the consistency of the Draft EIR with a July 2012 document prepared by the California Department of Justice that explains legal background and responsibilities for the consideration of environmental justice in CEQA documents, and potential recirculation of the Draft EIR. Although CEQA does not require the discussion or analysis of environmental justice, each of the issues referred to in the comment are addressed below.

Environmental Justice

Environmental justice relates to the fair treatment of all people with respect to environmental laws, regulations, and policies. One key aspect of environmental justice involves everyone having the same level of protection from environmental hazards. In many communities, there are areas which have a clean environment and high quality of life compared to other areas that may face environmental pollution and lack beneficial resources, such as parks and sidewalks. The second types of areas are often occupied by low-income residents who may lack resources and the ability to influence their environment. These areas are called “disadvantaged communities” and are required to be addressed in the general plan. According to the City of Inglewood’s proposed General Plan Environmental Justice Element the Project Site and neighborhoods south and west of the Project Site are disadvantaged communities.⁵⁵

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

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

An explanation of this circumscribed consideration of social and economic effects, including community character,⁵⁶ is presented on page 3.12-16 of the Draft EIR which states:

⁵⁵ City of Inglewood, *General Plan Environmental Justice Element*, recommended for approval by the Planning Commission on May 5, 2020, p. 7.

⁵⁶ The consideration of community character as an impact is not overtly addressed in the CEQA Guidelines, but was the focus of the case of *Preserve Poway v. City of Poway* (March 9, 2016) 245 Cal. App.4th 560, in which the California Court of Appeal, Fourth Appellate District, concluded that “the superior court erred in determining an EIR was required to study the psychological and social impacts discussed at the public hearings and related e-mails by project opponents in this case. CEQA requires decisions be informed and balanced, but it ‘must not be subverted into an instrument for the oppression and delay of social, economic . . . development or advancement.’ (Guidelines, § 15003, subd. (j).)”

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

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

- Draft EIR, Section 3.2, Air Quality, includes analysis of the potential for the Proposed Project to result in localized air pollutant emissions or odor emissions that could affect surrounding populations;
- Draft EIR, Section 3.8 Hazards and Hazardous Materials, analyzes the potential for the Proposed Project to result in exposure of nearby people to a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
- Draft EIR, Section 3.9, Hydrology and Water Quality, includes an analysis of the potential for the Proposed Project to affect water quality and impact the local drainage infrastructure, which also serves surrounding communities;
- Draft EIR, Section 3.10, Land Use and Planning includes an analysis of the potential for the Proposed Project to divide established communities and conflict with existing land use plans;
- Draft EIR, Section 3.11, Noise and Vibration, includes an analysis of the potential for the Proposed Project to generate construction or operational noise or vibration that would result in the most intense affects occurring to nearby sensitive receptors;
- Draft EIR, Section 3.12, Population, Employment, and Housing, includes an analysis of the potential for the Proposed Project, to result in direct or indirect displacement of a substantial number of people or housing from the areas surrounding the Project Site;
- Draft EIR, Section 3.14, Transportation and Circulation, includes an analysis of the potential for the Proposed Project to affect local roadways

and intersections, access to transit, and pedestrian and bicycle mobility, which would have the greatest effect on nearby residences and businesses;

- Draft EIR, Section 4.4 provides an analysis of growth-inducing effects, including the potential for the Proposed Project to cause increased activity in the local or regional economy; and
- Draft EIR, Section 4.5 provides an analysis of the potential for Proposed Project to result in economic impacts of such severity that they would lead to significant business closures and subsequent urban decay effects.

In 2016, the State of California passed Senate Bill 1000 (SB 1000) which established California Government Code section 65040.12.e requiring cities and counties to address environmental justice in their general plans. Cities and counties may choose to adopt a separate standalone Environmental Justice Element or address environmental policies throughout the General Plan. The Inglewood Planning Commission recommended approval of the Environmental Justice Element on May 5, 2020. City staff anticipates the City Council will consider adoption of the Environmental Justice Element in early June 2020.

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

Gentrification and Indirect Housing Displacement

The discussion of Impact 3.12-2, on pages 3.12-15 through 3.12-17 of the Draft EIR, provides a project-specific analysis of the potential for the Proposed Project to displace a substantial number of existing people or housing units necessitating the construction of replacement housing elsewhere. The impact analysis on page 3.12-16 includes a discussion of indirect displacement, identifying the City's efforts to determine if there is evidence to suggest that gentrification and indirect housing displacement are foreseeable socioeconomic effects pursuant to development of the Proposed Project. Page 3.12-16 identifies that the City's efforts to identify such evidence were intended to address several comments on the NOP, requesting that the City consider the potential for the Proposed Project to indirectly cause displacement of housing and residents as a

result of it causing the process of gentrification. To support its evaluation of potential indirect displacement, the City undertook a detailed study, conducted by ALH Urban & Regional Economics (the ALH Report) included in the Draft EIR as Appendix S, to consider and disclose anticipated impacts related to indirect displacement. As described on page 2 of the ALH Report, the purpose of the report is to specifically probe the local context of whether displacement effects arising from gentrification leading to the construction of new housing are likely outcomes pursuant to development of a new sports and entertainment venue in Inglewood.

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

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

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

Applicability of NEPA to FAA Actions

The Proposed Project is not subject to the requirements of the NEPA, which requires that a federal lead agency address environmental justice impacts resulting from a project that constitutes a major federal action or that has a federal nexus as a result of a federal agency approval, funding, permit, or similar action. The Proposed Project is not subject to FAA approval as a result of the

proximity of the Project Site to the Los Angeles International Airport. Draft EIR, Section 3.8, Hazards and Hazardous Materials, page 3.8-22, describes the applicability of Federal Aviation Regulations Part 77, Safe, Efficient Use and Preservation of Navigable Airspace, defining the FAA's role as follows:

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

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

The FAA review and determination regarding the Proposed Project is a technical evaluation and advisory action that pertains to the potential for the Project to constitute a hazard to air navigation. The Impact 3.8-5 discussion in the Draft EIR analyzed the potential for the Proposed Project to result in a safety hazard for people residing or working in the project area or the potential for the Proposed Project to create a hazard to navigable airspace and/or operations at a public airport and determined that the Proposed Project could exceed three criteria that require notification of, and evaluation by, the FAA. Mitigation Measure 3.8-5 would require the project applicant to submit the Form 7460-1 and complete the FAA review process, consistent with the requirements of Code of Federal Regulations Part 77, and make necessary adjustments to the Proposed Project, including project construction plans, to comply with the findings and recommendations of an FAA-initiated aeronautical study. For additional discussion of the status of Form 7460-1 submittals for the Proposed Project, please see Responses to Comments FAA-2 and ALUC-2.

FAA Order 1050.1F serves as the FAA's policy and procedures for compliance with NEPA and implementing regulations issued by the Council on

Environmental Quality (CEQ).⁵⁷ The order establishes FAA actions that are subject to NEPA review, including, but not limited to, grants, loans, contracts, leases, construction and installation actions, procedural actions, research activities, rulemaking and regulatory actions, certifications, licensing, permits, plans submitted to the FAA that require FAA's approval, and legislation proposed by the FAA. Order 1050.1F section 2-1.2 identifies FAA actions that are not subject to NEPA review. According to section 2-1.2(b),

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

(1) Determinations under 14 CFR part 77, Safe, Efficient Use, and Preservation of the Navigable Airspace.”⁵⁸

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

California Department of Justice Legal Background on Environmental Justice in CEQA

The comment refers to the 2012 State of California Department of Justice document entitled *Environmental Justice at the Local and Regional Level (Legal Background)*.⁵⁹ The document explains two sources of environmental justice-related responsibilities for local governments which are contained in the Government Code and in CEQA. The Legal Background describes how local governments can further environmental justice by following well-established CEQA principles. In defining the purpose of CEQA, the Legal Background states that specific provisions of CEQA and the State CEQA Guidelines require that local lead agencies consider how the environmental and public health burdens of a project might specially affect certain communities, citing examples including: (1) Environmental Setting and Cumulative Impacts, (2) The Role of Social and Economic Impacts Under CEQA, (3) Alternatives and Mitigation, and (4) Transparency in Statements of Overriding Consideration. Each of these

⁵⁷ U.S. Department of Transportation, Federal Aviation Administration, *Order 1050.1F, Environmental Impacts: Policies and Procedures*, July 16, 2015.

⁵⁸ U.S. Department of Transportation, Federal Aviation Administration, *Order 1050.1F, Environmental Impacts: Policies and Procedures*, July 16, 2015, p. 2-1.

⁵⁹ State of California Department of Justice, Kamala Harris, Attorney General, *Environmental Justice at the Local and Regional Level Legal Background*, July 10, 2012.

discussions are addressed below, along with an explanation of how the issue was addressed in the Draft EIR.

1) Environmental Setting and Cumulative Impacts

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

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

The Draft EIR analyzed the localized effects of construction and operations of the Proposed Project, related to NO_x, CO, PM₁₀, and PM_{2.5} emissions and toxic air contaminant concentrations, to determine if the Proposed Project would generate significant localized air quality impacts that could substantially affect air quality sensitive receptors in the vicinity of the Project Site. Page 3.2-46 of the Draft EIR identifies the methodology in identifying the study area for localized impacts:

The localized off-site emissions analysis focused on an approximately 1.3-mile radius from the Project Site, referred to as the local study area, rather than the full trip length assumed under the regional construction and operational emission calculations.¹³⁷ The local study area was the focus of this analysis because it would result in the highest incremental increase in ambient air pollution concentration due to capturing the emission from the Proposed Project on-site site construction, on-site operations, and the four intersections experiencing the maximum traffic volumes surrounding the Project Site.

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

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

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

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

2) The Role of Social and Economic Impacts Under CEQA

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

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

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

Draft EIR, Chapter 4, Other CEQA Required Considerations, pages 4-15 to 4-22, analyzes the potential for the Proposed Project to result in urban decay

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

3) Alternatives and Mitigation

Alternatives

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

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

- Alternative 1: No Project Alternative (see Draft EIR, pages 6-22 to 6-23);
- Alternative 2: Reduced Project Size Alternative (see Draft EIR, pages 6-23 to 6-31);
- Alternative 3: City Services Center Alternative Site (see Draft EIR, pages 6-31 to 6-43);
- Alternative 4: Baldwin Hills Alternative Site (see Draft EIR, pages 6-44 to 6-56);
- Alternative 5: The District at South Bay Alternative Site (see Draft EIR, pages 6-56 to 6-69);
- Alternative 6: Hollywood Park Specific Plan Alternative Site (see Draft EIR, pages 6-69 to 6-81); and

- Alternative 7: The Forum Alternative Site (see Draft EIR, pages 6-81 to 6-96).

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

Mitigation

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

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

4) Transparency in Statements of Overriding Consideration

The Legal Background defines the role of the lead agency in balancing a variety of public objectives, including economic, environmental, and social factors along with the goal of providing a decent home and satisfying living environment for every Californian. The document describes the discretion

provided to the lead agency pursuant to CEQA to approve a proposed project, and identifies the requirement of the lead agency, if it chooses to approve a project for which significant and unavoidable impacts would result, to provide a statement of overriding considerations that discloses in writing, based on substantial evidence in the record, its reasons for finding the significant and unavoidable impacts acceptable.

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

Recirculation of the Draft EIR

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

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

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

While the comment asserts that the Draft EIR should be recirculated in order to address environmental justice issues, it does not identify significant new

information related to the Proposed Project that has not already been addressed in the Draft EIR.

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

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

NRDC-5

The City carefully examined the question of backfill, the process of reuse of space or event dates associated with uses that under the Proposed Project would relocate to the Project Site from other locations in the Los Angeles region. The relocated uses or events include LA Clippers NBA basketball games currently hosted at the Staples Center, as well as concerts and other arena events that would otherwise occur at other venues, the LA Clippers team administrative offices, and the LA Clippers practice and training facility (see “Methodology and Assumptions” discussion provided in Draft EIR, Section 3.7 Greenhouse Gas Emissions, page 3.7-32).

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

based on these studies. The City believes that the partial backfill scenario is reasonable because of the following facts:

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

The Draft EIR analyzes both a partial backfill scenario and a full backfill scenario because the backfill of arena-type events is inherently dynamic and unpredictable, and to be fully understood must be monitored and verified in real time. Irrespective of whether the future backfill scenario more closely resembles the partial or full backfill scenarios presented in the Draft EIR, Mitigation Measures 3.7-1(a) (page 3.7-58) and 3.7-1(b) (page 3.7-64) would require achievement of net zero GHG emissions based on the emissions accounting provided by the project applicant in its Annual GHG Verification Report, to be reviewed and approved by the City with a copy submitted to CARB. The Annual GHG Verification Report would determine whether additional offset credits, or other measures, would be needed for the Proposed Project to result in net zero GHG emissions, and must include a process for verifying the actual number and attendance of net new, market-shifted, and backfill events (see Response to Comment NRDC-9).

NRDC-6

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

necessary to avoid or substantially lessen the significant impacts of the Proposed Project would be monitored through the Mitigation Monitoring and Reporting Program required to be adopted if the Proposed Project is approved.

The 2016 Air Quality Management Plan (AQMP) demonstrates that the South Coast Air Basin can achieve the federal air quality standards by the applicable deadlines even with projected growth through year 2031 (compared to the baseline of 2012) with population growth of 12 percent, growth in employment of 23 percent, and growth in vehicle miles traveled of 8 percent.⁶⁰ Thus, contrary to the implication in the comment, a project with net new emissions is not inherently inconsistent with the goals of the AQMP. As detailed below, the Project-specific mitigation measures and PDFs would be consistent with many of the plans and strategies outlined in the 2016 AQMP.

Mitigation Measure 3.2-2(c), implementing PDF 3.2-1, would require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and US EPA Tier 4 Final off-road emissions standards or equivalent, and that equipment such as concrete/ industrial saws, pumps, aerial lifts, material hoists, air compressors, and forklifts must be electric or alternative-fueled (i.e., non-diesel). These strategies are consistent with CARB's efforts to achieve additional reductions from off-road equipment, which are included in the 2016 AQMP (see Draft EIR, page 4-40).⁶¹

Mitigation Measure 3.2-2(c) also would require operators of heavy-duty haul trucks visiting the Project Site during construction commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards. Accelerating the retirement of older on-road heavy-duty vehicles is consistent with SCAQMD's Proposed Mobile Source 8-Hour Ozone Measure MOB-08. The mitigation measure also would require the project applicant to "strive to use zero-emission (ZE) or near-zero-emission (NZE) heavy-duty haul trucks during construction," consistent with SCAQMD's Proposed Mobile Source 8-Hour Ozone Measure MOB-07.

The Proposed Project would also result in an increase in short-term employment compared to existing conditions, as indicated on page 3.2-66. Although the Proposed Project would generate construction workers on the Project Site during the construction process, construction-related jobs generated by the Proposed Project would likely be filled by employees within the construction

⁶⁰ SCAQMD, Final 2016 Air Quality Management Plan, <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>, Table 3-3 on page 3-18; accessed April 16, 2020.

⁶¹ SCAQMD, Final 2016 Air Quality Management Plan, <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15>, Table 3-3 on p. 3-18; accessed April 16, 2020.

industry within the City of Inglewood and the greater Los Angeles region. Therefore, the construction jobs generated by the Proposed Project would not conflict with the long-term employment or population projections upon which the AQMPs are based.

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

Nevertheless, because regional emissions during construction and operation of the Proposed Project would exceed the significance thresholds for those criteria air pollutants for which the Air Basin is not in attainment (i.e., VOC, NO_x, PM₁₀, and PM_{2.5}), the EIR states that the Proposed Project would have a significant impact regarding consistency with the AQMP.

With respect to Impact 3.2-2, as discussed in the Draft EIR, the Proposed Project would exceed established thresholds for construction NO_x emissions and operational emissions of VOC, NO_x, CO, PM₁₀, and PM_{2.5} that would represent a considerable contribution to a cumulative impact. Therefore, Mitigation Measures 3.2-6(a) through 3.2-6(d), discussed on page 3.2-104, would be required to reduce the Proposed Project contribution to cumulative impacts related to the construction and operation of the Project. Aside from these mitigation measures, there are no additional feasible mitigation strategies to further reduce the maximum daily regional emissions during operations.

With respect to Impact 3.2-5, as discussed above regarding Impact 3.2-1, the Proposed Project would be consistent with plans and strategies included in the 2016 AQMP. However, because pollutant emissions from the Proposed Project would exceed significance thresholds for those criteria air pollutants for which the Air Basin is not in attainment (i.e., VOC, NO_x, PM₁₀, and PM_{2.5}), the Proposed Project would have a significant impact regarding consistency with the AQMP.

NRDC-7

The analysis in the Draft EIR included calculations based on the EMFAC2017 emission model, which is the most current model for mobile source emissions

approved by both CARB and the US EPA. Therefore, EMFAC2017 is the most appropriate model to use for assessing mobile source emissions for the Proposed Project. The effect of the potential revocation of the US EPA waiver has not been incorporated in the EIR as it is currently subject to litigation and it would be speculative to prejudge the outcome of the legal proceedings.⁶² Therefore, the analysis, as completed is correct with the most currently approved standards.

On September 27, 2019, the US EPA and the National Highway Traffic Safety Administration (NHTSA) published the SAFE Part One (84 Fed. Reg. 51,310). The SAFE Rule Part I Rule revokes California's authority to set its own GHG emissions standards and set zero emission vehicle mandates in California. On March 31, 2020, the US EPA and NHTSA released the final SAFE regulation, known as SAFE Part II, and submitted it for publication in the Federal Register. SAFE Part II is expected to be effective 60 days after being published in the Federal Register. The new regulation sets CO₂ emissions standards and CAFE standards for passenger vehicles and light duty trucks, covering model years 2021-2026. Under the final regulation, both CAFE and CO₂ emissions standards will increase in stringency by 1.5 percent per year from 2021 through 2026 over model year 2020 levels, which is less stringent than the five percent annual increases required under the previous federal requirements. Thus, implementation of the SAFE Rule Part II would increase the emission factors of mobile source gasoline fueled vehicles model year 2021 or newer by a small margin.

On November 20, 2019, CARB published EMFAC off-model adjustment factors to account for the SAFE Rule Part I.⁶³ These adjustment factors increase mobile emission factors up to 0.34 percent depending on the criteria pollutant. For example, under the 18,500 attendee concert scenario (the largest attendee event at the proposed Arena), reported in the Draft EIR in Table 3.2-23, CO emissions with the SAFE Rule Part I adjustment factor increase from 916.80 pounds per day (lbs/day) to 919.90 lbs/day, a difference of 0.33 percent. Under the same scenario, NO_x emissions increase from 92.83 lbs/day to 92.86 lbs/day, an increase of 0.03 percent.⁶⁴ For all pollutants for which CARB issued correction factors, the change to the emissions are negligible and impacts remain significant and unavoidable.

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

After preparation of the air quality emissions modeling, on September 27, 2019, the US EPA and the National Highway Traffic Safety

⁶² California Air Resources Board. 2019. EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One. November 20, 2019.

⁶³ Available: https://ww3.arb.ca.gov/msei/emfac_off_model_adjustment_factors_final_draft.pdf.

⁶⁴ ESA, 2020. SAFE Part I Rule Quantifications and Emissions Comparison for the Inglewood Basketball and Entertainment Center Project Final EIR. May 27, 2020.

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

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

NRDC-8 The off-model adjustments to EMFAC that were issued by CARB in November to address the SAFE Part I rule did not include adjustment factors for GHG emissions because revisions to the GHG emissions and fuel efficiency standards were expected in the SAFE Part II rule. CARB has not released the GHG adjustment factors as part of the SAFE Part II rule. Regardless of CARB’s forthcoming guidance and the legal challenges that could delay implementation of the SAFE Part II rule, the Proposed Project must meet the “no net new” emissions threshold, in the manner described in Mitigation Measures 3.7-1(a) and 3.7-1(b). As described in Mitigation Measure 3.7-1(b), “[t]he Annual GHG Verification Report shall estimate the Proposed Project emissions for the previous year based on operational data and methods, and using appropriate emissions factors for that year.” Accordingly, the existing mitigation measure would account for any future regulatory changes and associated emissions quantification.

NRDC-9 As described above in Responses to Comments NRDC-7 and NRDC-8, the analyses of criteria air pollutants and GHGs in the Draft EIR are accurate. The mitigation measures presented in the Draft EIR represent all mitigation measures that would be effective, implementable, and feasible. Nevertheless, the comment suggests a number of additional measures, each of which is discussed below.

The comment suggests that shuttle buses should be zero-emission (ZE) vehicles starting on day one. The project applicant would implement the Proposed Project shuttle and charter bus program by contracting with a third-party

commercial operator. Although ZE shuttle buses exist today, deployment among commercial operators of ZE shuttles is limited. Because of the operational requirements for the shuttle program (45 persons per shuttle), the current limited supply of ZE shuttles and necessary infrastructure to support operations, and the limited available incentives to support the purchase of ZE shuttles by local commercial operators means that it is currently uncertain as to whether ZE shuttles would be commercially available to be deployed when the required shuttle services to the Proposed Project would be initiated.⁶⁵ To support its assessment of the feasibility of deployment of ZE shuttle buses, the City retained an air pollution reduction technology expert, Ray Gorski, to conduct a detailed evaluation of the potential availability of ZE and NZE technology as part of the construction and operation of the Proposed Project. Based on the input from the City's expert, the feasibility of requiring ZE shuttle buses on day one with the inventory that is commercially deployed is uncertain.

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

Mitigation Measure 3.2-2(e)

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

The comment states that emergency generators should be electrically powered. As indicated on page 3.2-45 of the Draft EIR, the Arena Site would include up to two stationary emergency generators with an estimated total capacity rated at approximately 2,400 kilowatts (kW) that would provide building electricity to life safety systems such as elevators and fire pumps in the event of a power outage. Because in an emergency electric power may not be available, the use of electric generators would not be feasible for use in emergency situations.\

The comment also states that the Proposed Project should include both more solar panels and storage for solar power. As indicated in Chapter 2, Project Description, page 2-7, a photovoltaic (PV) solar panel system would be installed that would have the capacity to generate more than one million kilowatt (kW) hours per year. The purpose of the PV system would be to generate renewable energy and offset grid energy use. Battery energy storage would be integrated to optimize payback of the PV system by reducing demand, particularly peak demand, on event days, and by saving time-of-use charges. Emergency backup power would be provided by inverters for the West Parking Garage and East

⁶⁵ Ray Gorski, Inglewood Basketball & Entertainment Center Draft EIR: Review of Suggested Mitigation Measures, May 2020.

Transportation Hub and Parking Garage. However, considering the size of the uses in the Arena Site, a solar PV system with battery energy storage is not feasible or suitable to meet the minimum run-time and necessary loads for emergency backup power required by the California Electrical Code.

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

The results of the review by the City’s air pollution reduction technology expert indicated that ZE and NZE trucks are available but with limited applicability to construction-related activities. Performance requirements of heavy-duty on-road trucks for the construction activities required for the Proposed Project (i.e., soil import/export) are typically Class 8 trucks with a Gross Vehicle Weight Rating (GVWR) greater than 33,000 pounds, equipped with engines greater than 10 liters. Currently ZE and NZE trucks available consist of engines with displacement of 6.8- and 8.9-liters are not powerful enough to provide the main service needed during construction (hauling) and therefore would not represent a meaningful portion of the on-road truck trips analyzed in the draft EIR. Because ZE and NZE equipment costs considerably more than similar diesel-powered equipment, most purchasers rely on one of several incentive programs offered by the California Air Resources Board (CARB), California Energy Commission (CEC), or programs administered by the SCAQMD to offset the cost. Based on a search of all major California programs that offer incentives for this type of engine, none were used for construction-related activities such as haul trucks. Because of the uncertainty of the availability of on-road trucks appropriate for construction duty in the market in the timeframe anticipated for project construction, an unequivocal requirement to use ZE or NZE technology that is not yet commercially available would be too speculative to be considered feasible at this time.

Mitigation Measure 3.2-2(d) requires the project applicant to incentivize the use of ZE or NZE heavy-duty trucks for vendors and material deliveries during operation of the Proposed Project. Requiring NZE trucks during operations, as requested by the SCAQMD, would be infeasible as trucks visiting the Project Site would primarily be from third party vendors or tenants, which may be selected based on specific, possibly competing, criteria than their access to ZE or NZE delivery trucks. For example, in order to ensure that the City achieves its goal of additional employment opportunities for Inglewood residents and businesses, the proposed Development Agreement requires the developer, as the owner of the Arena, to take various actions to 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 may have access. According to the City's air pollution reduction technology expert, as of today there is limited availability of NZE and ZE vehicles in commercial businesses, and specifically in businesses that support the commercial activities that would likely be needed at an event center like the Proposed Project. Additionally, it is not currently knowable which vendors or tenants would be present during initial operations, and they may change over time. For these reasons, it is speculative to assume that it would be feasible to require vendors and suppliers to provide deliveries and services exclusively, or even meaningfully, using NZE and ZE. As such Mitigation Measure 3.2-2(d) includes all feasible mitigation. Please also see Response to Comment SCAQMD3-14.

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

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

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

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

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

Mitigation Measures 3.7-1(b) in the Draft EIR establishes that the GHG Reduction Plan would be monitored and independently verified annually, with reporting provided to the City and a copy to CARB, and refined, as necessary, in order to meet the performance standard in the coming year. Any such revisions would be subject to review and approval by the City: The measure states that “[f]ollowing completion and verification of the Annual GHG Verification Report, the GHG Reduction Plan shall be refined as may be needed in order to maintain emissions below net zero over the next reporting year. Any such revisions shall be prepared by the qualified expert retained by the project applicant and shall be subject to review and approval by the City.” The City’s review and approval of refinements to the GHG Reduction Plan would not be a discretionary project under CEQA because the role of the City would be “to determine whether there has been conformity with applicable statutes, ordinances, or regulations, or other fixed standards...”, and not the exercise of judgment or deliberation to approve or disapprove a particular activity, in accordance with CEQA Guidelines section 15378.

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

California’s Cap and Trade Program is overseen by CARB, which has adopted five Compliance Offset Protocols to date that qualify for use in the State of California’s Cap and Trade program, and has approved three Offset Project Registries (American Carbon Registry, Climate Action Reserve, and Verra [formerly the Verified Carbon Standard]), to help administer the Compliance

Offset Program. These registries were selected because of their commitment to ensuring that the offsets they contain are permanent, additional, quantifiable, and enforceable. There is no requirement under CEQA that GHG offsets used for mitigation meet CARB standards for Cap and Trade compliance offsets. Nevertheless, Mitigation Measure 3.7-1(a)(2)(B)(b)(i) specifies the use of a CARB-approved offset project registry in order to ensure that any offsets used for mitigation of the Proposed Project GHG emissions would be of the highest quality – i.e., real, additional, permanent, and third-party verified.

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

NRDC-10

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

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

record that supports a conclusion that a new sports venue would indirectly contribute to displacement of existing housing units or residents.

NRDC-11

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

Although the comment asserts that human health impacts of displacement “are real,” the analysis presented in the Draft EIR, including an expert study undertaken by ALH Urban & Regional Economics, concludes that there is no evidence directly connecting the Proposed Project to substantial housing displacement that would result in the need for construction of new housing. No evidence in the record supports a conclusion that a new sports venue would indirectly contribute to such effects that would result in displacement of existing housing units or residents in such substantial numbers that the construction of new housing elsewhere would be necessitated. Because the Proposed Project would not be associated with substantial displacement, the EIR is not required to discuss the relationship of displacement to human health. Please see Response to Comment NRDC-4 for a further discussion of the City’s analysis concluding the Proposed Project would not result in indirect housing displacement.

Aesthetics

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

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

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

Air Quality

Draft EIR, Section 3.2, Air Quality, first describes health impacts qualitatively by identifying criteria air pollutants such as ozone, volatile organic compounds (VOCs), nitrogen dioxide (NO₂), nitrogen oxides (NO_x), carbon monoxide (CO) sulfur dioxide (SO₂), particulate matter (PM₁₀ and PM_{2.5}), and lead (Pb). The notable health problems and consequential damage to the environment from these pollutants are described on pages 3.2-3 through 3.2-12. The health impacts of toxic air contaminants (TACs), which are known or suspected to cause serious health problems are also described in the Draft EIR (page 3.2-9 through 3.2-11). TACs include diesel exhaust, gasoline exhaust, and visibility reducing particles.

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

Health Impact Assessment

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

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

Localized Impact Assessment

The potential localized impacts from short-term construction activities and long-term operation of the Proposed Project are analyzed in the Draft EIR using an air dispersion model (AERMOD) to generate concentrations of nitrogen dioxide (NO₂), CO, and small particulate matter (PM₁₀ and PM_{2.5}) at air quality sensitive receptor locations surrounding the Project Site (see Draft EIR, pages 3.2-91 to 3.2-94). The localized impacts of both construction emissions and operational emissions would be below applicable local and federal thresholds.

As indicated on page 3.2-94, a CO hotspot analysis was completed for the Proposed Project because elevated concentrations of this pollutant tend to accumulate near areas of heavy traffic congestion and where average vehicle speeds are low. A detailed review of the traffic data identified the four intersections in the vicinity of the Project Site that demonstrated the most degraded Level of Service (LOS) and highest vehicle volumes associated with the Proposed Project. Logically, if these vehicular emissions at these four intersections would result in CO concentrations less than the established thresholds, all other affected intersections would also be below the thresholds. As shown in Table 3.2-30, the CO concentrations at all four evaluated intersections would be below the applicable CAAQS, resulting in a less-than-significant impact.

Health Risk Assessment

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

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

Hazards and Hazardous Materials

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

The impact analysis (see Impacts 3.8-1 and 3.8-2) explains the status of known hazards that exist on the site (see Draft EIR, pages 3.8-30 to 31). The removal of older structures on the site has the potential to result in exposures to asbestos containing materials and other hazardous building materials that could result in adverse health effects “if not managed appropriately as required by existing laws and regulations” (see Draft EIR, pages 3.8-32 to 33). The analysis discusses the potential for improper handling and transport of hazardous materials to result in adverse health effects to workers and the public. Because these hazards would be managed in compliance with federal, State, and local regulations regarding the management of hazardous materials, the analysis concluded that the health-related impacts of these hazards would be less than significant.

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

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

environment to contaminated soils or groundwater could occur during construction of the Proposed West Parking Garage.”

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

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

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

Noise

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

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

A discussion under Impact 3.11-1 (Draft EIR, page 3.11-101) describes the potential health effects of significant construction noise impacts of the Proposed Project, and Figure 3.11-7 on page 3.11-102 of the Draft EIR identifies areas around the Project Site that could be subject to potential sleep disturbance as a result of worst-case nighttime construction. The analysis of health effects concludes that “[d]ue to the high variability of each individual’s sensitivity to nighttime noise, uncertain factors related to nighttime construction activity such as number of peak noise level occurrences, and lack of an established or adopted

threshold designating acceptable occurrences of awakenings, the estimated area for awakenings presented in this analysis represents the City’s best effort to disclose the potential sleep disturbance effects of nighttime construction, but do not represent predictions of sleep awakenings for any specific location or population.” It then goes on to conclude that “[w]hile exposure to high levels of noise during sleep can result in physiological responses, it is not possible to predict such effects in any particular population.”

In addition to construction noise health effects, the Draft EIR also considered the potential health effects of roadside noise impacts (see Draft EIR, page 3.11-137). The analysis explains that post-event traffic noise after evening Major Events “could generate significant noise levels late into the evening hours up to 15-25 times a year, [and] could disturb sleep during nighttime hours.” However, given the time of the evening (9:30-10:30 PM) and relatively short duration of post-event traffic, “significant traffic noise increases of the Proposed Project would not be expected to result in adverse health impacts.”

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

Conclusion

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

NRDC-12

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

Message

From: Christopher E. Jackson [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d28bfd2b0f274cd8af3119a3b715d010-Christopher E.]
on behalf of Christopher E. Jackson
Sent: 12/31/2019 11:00:57 AM
To: Mindala Wilcox [/o=Inglewood/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b46bfd8a1e12482fb4f973bea21d23c4-Mindala Wilcox]
Subject: FW: Clippers Arena

FYI

Mr. Christopher E. Jackson, Sr.

City of Inglewood
Director - Economic and Community Development Department
Economic Development, Planning, Building Safety, Code Enforcement
One West Manchester Blvd., 4th Floor, Inglewood, CA 90301
Voice: (310) 412-5672 Fax: (310) 412-5681 Email: cejackson@cityofinglewood.org

From: richard garcia [mailto:skybull317@gmail.com]
Sent: Monday, December 30, 2019 12:15 PM
To: Christopher E. Jackson <cejackson@cityofinglewood.org>
Subject: Clippers Arena

Hi,

The report is out on the Clippers Arena. Which is concern about the traffic.

Months & months ago (8mos.) I email the Mayor Butts about building a Gondola Ride because they will build one for Dodgers Stadium from DTLA to the Stadium. He replied "Interesting, I will into it". I email him last month for an update & I got no answer.

I suggested the several Gondola Rides not just to the Clippers Arena but the Rams Stadium as well. I suggested Gondola Ride from the Green Line Station to the Arena/Stadium. This would provide less traffic on game days.

Another suggestion is to tell Fans & Concert goers to take public transportation (Trains/Buses) to their particular events. Have Metro create new bus lines & train services with extended hours. Example have the buses running to lam because basketball ends around 10:15pm unless overtime happens. Concerts varies in times. This will allows people to take public transportation home. This create less traffic on the streets

Well, I'll let you go. I wanted to tell my idea to you. If you see Mayor Butts tell him to email me. He has it. I can't wait for this Arena to be built. I so desperately want to get away from the Lakers & their fans. 😊

Thanks!

Richard,
An LAC Fan

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2
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**Letter
Garcia
Response****Richard Garcia**
December 30, 2019

Garcia-1 The comment refers to the Los Angeles Aerial Rapid Transit project, also known as the Dodger Stadium Gondola project. This project is currently undergoing an environmental review, led by Metro. No analysis of the project has been released. The project would connect Union Station in downtown Los Angeles to Dodger Stadium, providing a transit option for stadium attendees, and could conceivably serve as a tourist attraction on non-event days. The proposal is estimated to be 1.25 miles in length. Station locations have not been determined. The cost of the project is preliminarily estimated to be \$125 million. The project is privately financed.⁶⁶

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

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

⁶⁶ Metro, 2019. Board Report, Executive Management Committee, Informational Report, Los Angeles Aerial Rapid Transit Project Update. April 18. Additional information is available at the LA ART sponsor's website at <https://www.aerialrapidtransit.la/>.

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

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

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

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

February 1, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

As a resident of Inglewood, I am proud to support the Inglewood Basketball and Entertainment Center and respectfully ask the City to approve the project's draft environmental impact report (EIR) in a timely manner.

I was very pleased to see that this draft EIR included an exhaustive analysis of how the project could impact the families and small business owners near Prairie Avenue and Century Boulevard. More importantly, there are a variety of mitigation measures that will be put in place to protect us from traffic, noise and air emissions that may occur during the construction and operation of the arena. The project also includes neighborhood protections during construction through commitments such as the construction management plan, limiting emissions from diesel engines and equipment during construction, and a requirement to shield or redirect lighting away from residential uses during construction.

Please approve the draft EIR so we can get started on this project.

Regards,



Halimah Ginyard
Inglewood Resident

**Letter
Ginyard1
Response**

Halimah Ginyard
February 1, 2020

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

February 2, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR--Traffic

Dear Ms. Wilcox:

I am writing to share my whole-hearted support for the Inglewood Basketball and Entertainment Center.

With this project, Inglewood will once again become a destination for many in the surrounding areas. Like many smaller destination cities, that means we'll likely have a bit more traffic. But more traffic means more people coming to eat at local restaurants and shop at nearby stores.

It's estimated that NBA games and community events will generate approximately \$260 million in overall economic activity for Inglewood annually and the construction phase alone will generate an estimated \$450 million in wages for local residents. That's significant!

And when more people spend more money in Inglewood, we all benefit. Our children enjoy nicer parks and better schools, city services increase, and families can provide a better future for the next generation.

I hope that the City Council will approve this project quickly.

Sincerely,

Signature: Angela Boles

Name (Printed): Angela Boles

Email: angelaboles@aol.com

**Letter
Boles1
Response**

Angela Boles
February 2, 2020

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

February 2, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR--Traffic

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And when more people spend more money in Inglewood, we all benefit. Our children enjoy nicer parks and better schools, city services increase, and families can provide a better future for the next generation.

I hope that the City Council will approve this project quickly.

Sincerely,

Signature:

Holly M Carr

Name (Printed):

Holly Carr

Email:

Holly M Carr @ gmail

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

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

February 2, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

I am a proud, longtime resident of Inglewood and I am writing today to express my enthusiastic support for the Inglewood Basketball and Entertainment Center and respectfully ask for approval of the draft environmental impact report. As someone who has fond memories of the last NBA team we had in town, I am thrilled to welcome the LA Clippers to Inglewood.

During the 1970s and '80s, I had the opportunity to organize boxing matches at Hollywood Park. Later, I owned a limousine service through which I got to know the owner of the Lakers. There are so many fond memories for me of what our City was like during the heyday of sports competition in Inglewood. There was pride, excitement and opportunity.

Once again, we are feeling that sense of pride, excitement and opportunity with the LA Clippers looking to build an arena here. I understand the team's community benefits package will include hundreds of thousands of dollars for senior programming and computer literacy. How cool will it be when we are able to expand our skills and knowledge! To me, this is a sign that the team is serious about being a good and active participant in the Inglewood community.

I support the Inglewood Basketball and Entertainment Center and hope that you will move in a timely manner to approve the project's environmental impact report.

Regards,



Edward Edwards
Inglewood Resident

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

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

February 2, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR—Traffic

Dear Ms. Wilcox:

I am writing to share my whole-hearted support for the Inglewood Basketball and Entertainment Center.


With this project, Inglewood will once again become a destination for many in the surrounding areas. Like many smaller destination cities, that means we'll likely have a bit more traffic. But more traffic means more people coming to eat at local restaurants and shop at nearby stores.

It's estimated that NBA games and community events will generate approximately \$260 million in overall economic activity for Inglewood annually and the construction phase alone will generate an estimated \$450 million in wages for local residents. That's significant!

And when more people spend more money in Inglewood, we all benefit. Our children enjoy nicer parks and better schools, city services increase, and families can provide a better future for the next generation.

I hope that the City Council will approve this project quickly.

Sincerely,

Signature: 

Name (Printed): Halim

Email: halim.gy@yolo.ca

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**Letter
Ginyard2
Response**

Halimah Ginyard
February 2, 2020

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

February 2, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR—Traffic

Dear Ms. Wilcox:

I am writing to share my whole-hearted support for the Inglewood Basketball and Entertainment Center.

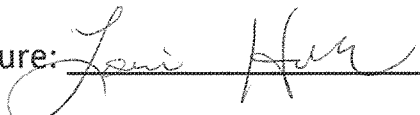
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And when more people spend more money in Inglewood, we all benefit. Our children enjoy nicer parks and better schools, city services increase, and families can provide a better future for the next generation.

I hope that the City Council will approve this project quickly.

Sincerely,

Signature: 

Name (Printed): Louise Holmes

Email: malouise.holmes@yahoo.com

**Letter
Holmes1
Response**

Louise Holmes
February 2, 2020

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

February 2, 2020

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One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

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I hope that the City Council will approve this project quickly.

Sincerely,

Signature: Debrau Jennings-Mau

Name (Printed): DEBRAU JENNINGS-MAU

Email: plasticdebbie10@gmail.com

1

**Letter
Jennings-
Mau1
Response**

Deborah Jennings-Mau
February 2, 2020

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

February 2, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR–Traffic

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I hope that the City Council will approve this project quickly.

Sincerely,

Signature:

Name (Printed):

Email:

*Heather Presha, Keller Williams Realty,
Inglewood*
Heather Presha
heather@preshaproperties.com

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**Letter
Presha1
Response**

Heather Presha
February 2, 2020

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

February 2, 2020

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Inglewood, CA 90301

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With this project, Inglewood will once again become a destination for many in the surrounding areas. Like many smaller destination cities, that means we'll likely have a bit more traffic. But more traffic means more people coming to eat at local restaurants and shop at nearby stores.

It's estimated that NBA games and community events will generate approximately \$260 million in overall economic activity for Inglewood annually and the construction phase alone will generate an estimated \$450 million in wages for local residents. That's significant!

And when more people spend more money in Inglewood, we all benefit. Our children enjoy nicer parks and better schools, city services increase, and families can provide a better future for the next generation.

I hope that the City Council will approve this project quickly.

Sincerely,

Signature: 

Name (Printed): AARON L. ROBERTS

Email: aaron.sell@ca@gmail.com

1

**Letter
Roberts
Response**

Aaron Roberts
February 2, 2020

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

February 2, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR–Traffic

Dear Ms. Wilcox:

I am writing to share my whole-hearted support for the Inglewood Basketball and Entertainment Center.

With this project, Inglewood will once again become a destination for many in the surrounding areas. Like many smaller destination cities, that means we'll likely have a bit more traffic. But more traffic means more people coming to eat at local restaurants and shop at nearby stores.

It's estimated that NBA games and community events will generate approximately \$260 million in overall economic activity for Inglewood annually and the construction phase alone will generate an estimated \$450 million in wages for local residents. That's significant!

And when more people spend more money in Inglewood, we all benefit. Our children enjoy nicer parks and better schools, city services increase, and families can provide a better future for the next generation.

I hope that the City Council will approve this project quickly.

Sincerely,

Signature: Sam Williams

Name (Printed): Sam Williams

Email: Samdaslam@yahoo.com

1

**Letter
Williams1
Response**

Sam Williams
February 2, 2020

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

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

As someone who has lived in Inglewood for decades, I wanted to share with you why I believe the Inglewood Basketball and Entertainment Center will be good for Inglewood.

This project will not only create additional jobs, but it will also play an important role in our community's revitalization. I remember a time when the Lakers and Kings played at the Forum, the horse track held frequent races and local restaurants and shops thrived. That's also why I'm confident that any increases in traffic can be managed. We've done it effectively before and that was without the technology that is available now.

We should have the foresight to recognize that the new jobs, economic development and \$100 million in community benefits this project will bring far outweigh the inconvenience of increased traffic for a couple of hours on game days.

I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:

Name (Printed):

Email:



James Allen

Biz @ jamzarcannery.com

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

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

February 3, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

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We should have the foresight to recognize that the new jobs, economic development and \$100 million in community benefits this project will bring far outweigh the inconvenience of increased traffic for a couple of hours on game days.

I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: Angela Boles

Name (Printed): Angela Boles

Email: angelaboles@aol.com

**Letter
Boles2
Response**

Angela Boles
February 3, 2020

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

Letter Campbell

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

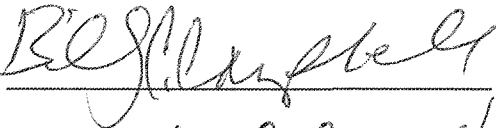
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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: 

Name (Printed): Billy Campbell

Email: billycamp@co.ingl.ca.us

**Letter
Campbell
Response**

Billy C. Campbell
February 3, 2020

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

February 3, 2020

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One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: Duana Chenier

Name (Printed): DUANA CHENIER

Email: duana @ rockpaperdetails.com

**Letter
Chenier
Response**

Duana Chenier
February 3, 2020

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

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

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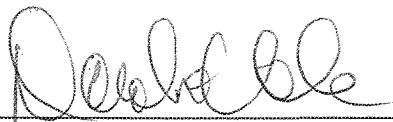
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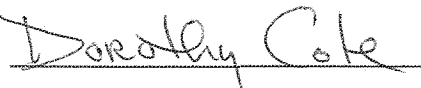
I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: _____



Name (Printed): _____



Email: _____

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

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

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:



Name (Printed): Cuban Leaf Cigar Lounge

Email: CubanLeafClub@gmail.com

1

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

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

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

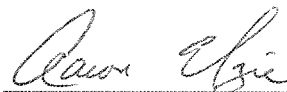
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We should have the foresight to recognize that the new jobs, economic development and \$100 million in community benefits this project will bring far outweigh the inconvenience of increased traffic for a couple of hours on game days.

I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: 

Name (Printed): AARON ELZIE

Email: ELZIEAL@YAHOO.COM

1

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

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

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

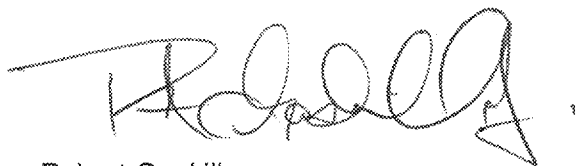
I am writing to you today as an Inglewood business owner who is dedicated to reducing man's impact on our environment. For that reason, I am proud to support the Inglewood Basketball and Entertainment Center Project and respectfully ask the City to approve the project's draft environmental impact report (EIR) in a timely manner.

For more than two decades, I have been in the transportation business. My company, Motev, is committed to planting a tree for every vehicle trip we take. We are very passionate about climate change and believe everyone must do his or her part to reduce their carbon footprint. Did you know that tropical forest destruction accounts for about 20 percent of current greenhouse gas emissions?

Technology has the power to change the world for the better. We embrace and champion the advancement of technologies designed to support environmental sustainability. This is why I am so excited for the Inglewood Basketball and Entertainment Center to be built in Inglewood. The draft EIR shows that the project will become one of the most environmentally-friendly and energy-efficient sports venues in the country. The EIR is an extremely thorough examination of the project that provides innovative solutions to the issues, such as a transportation demand management program to reduce vehicle trips and LEED Gold certification for the project.

Inglewood residents deserve the benefits from new development that provides thoughtful responses to the complex environmental challenges of our world today. Please approve the draft EIR and let's move as fast as possible to get this project approved.

Regards,



Robert Gaskill
CEO, Motev

**Letter
Gaskill
Response**

Robert Gaskill
February 3, 2020

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

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

As someone who has lived in Inglewood for decades, I wanted to share with you why I believe the Inglewood Basketball and Entertainment Center will be good for Inglewood.

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We should have the foresight to recognize that the new jobs, economic development and \$100 million in community benefits this project will bring far outweigh the inconvenience of increased traffic for a couple of hours on game days.

I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: _____



Name (Printed):

Yonnie Hagos

Email:

Yonnie@gvohospitality.com

1

**Letter
Hagos
Response**

Yonnie Hagos
February 3, 2020

Hagos-1

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

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

As someone who has lived in Inglewood for decades, I wanted to share with you why I believe the Inglewood Basketball and Entertainment Center will be good for Inglewood.

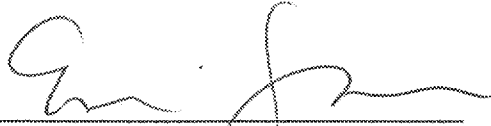
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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:



Name (Printed):

ERIN JAMES

Email:

Erin@rockpaperdetails.com

1

**Letter
James
Response**

Erin James
February 3, 2020

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

Letter Jennings-Mau2

February 3, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

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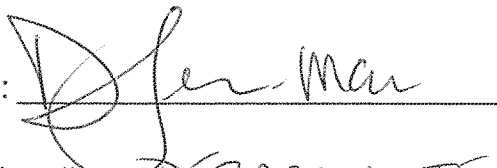
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We should have the foresight to recognize that the new jobs, economic development and \$100 million in community benefits this project will bring far outweigh the inconvenience of increased traffic for a couple of hours on game days.

I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:



Name (Printed):

DEBORAH JENNINGS-MAU

Email:

plasticdebbie10@gmail.com

**Letter
Jennings-
Mau2
Response**

Deborah Jennings-Mau
February 3, 2020

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

February 3, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

Re: Inglewood Basketball and Entertainment Center Draft EIR

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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: Marina Kay

Name (Printed): MARINA KAY

Email: mkay@gmail.com

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

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

Letter Morrison

February 3, 2020

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

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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:



Name (Printed):

Dolly Morrison

Email:

ms.DollyMorrison@
gmail.com

**Letter
Morrison
Response**

Dolly Morrison
February 3, 2020

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

Letter Phillips

February 3, 2020

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

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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:

Name (Printed):

Email:


Jacquelyn M. Phillips
millani09@ingwood.ca.gov

**Letter
Phillips
Response**

Jacquelyn M. Phillips
February 3, 2020

Phillips-1

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

February 3, 2020

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Inglewood, CA 90301

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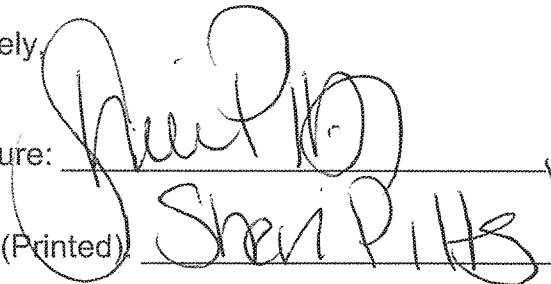
I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:

Name (Printed)

Email:



Sheri Pilts

1

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

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

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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:

Cheree Psalms

Name (Printed):

Cheree Psalms

Email:

cheree.psalms@yahoo.com

**Letter
Psalms
Response**

Cheree Psalms
February 3, 2020

Psalms-1

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox:

As someone who has lived in Inglewood for decades, I wanted to share with you why I believe the Inglewood Basketball and Entertainment Center will be good for Inglewood.

This project will not only create additional jobs, but it will also play an important role in our community's revitalization. I remember a time when the Lakers and Kings played at the Forum, the horse track held frequent races and local restaurants and shops thrived. That's also why I'm confident that any increases in traffic can be managed. We've done it effectively before and that was without the technology that is available now.

We should have the foresight to recognize that the new jobs, economic development and \$100 million in community benefits this project will bring far outweigh the inconvenience of increased traffic for a couple of hours on game days.

I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Adrian T. Riley
President & CEO
WLM Financial

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

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

February 3, 2020

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

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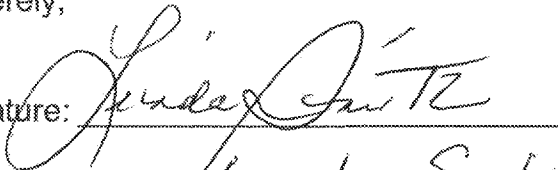
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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:



Name (Printed):

Landa Smith

Email:

ldiamond@gbfa.com

Letter
L. Smith
Response

Linda Smith
February 3, 2020

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

February 3, 2020

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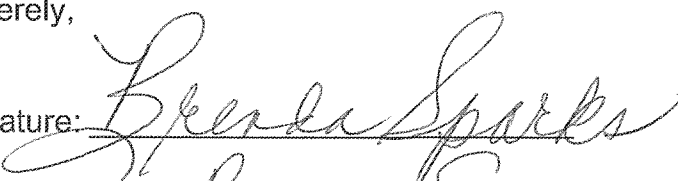
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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: 

Name (Printed): BRENDA SPARKS

Email: bbtykr236@GMAIL.COM

1

**Letter
Sparks
Response**

Brenda Sparks
February 3, 2020

Sparks-1

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

Letter Torregano

February 3, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

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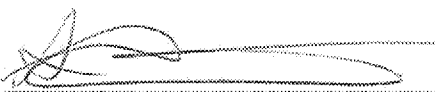
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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature: 

Name (Printed): Alfred Torregano

Email: alfred@elevateculture.today

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

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

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I urge the City Council to approve the project's draft environmental impact report.

Sincerely,

Signature:



Name (Printed):

CHIBBY WALTON

Email:

chibbywalt@aol.com

**Letter
Walton1
Response**

Chibuzo Walton
February 3, 2020

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

Letter Albero

February 4, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR-Traffic

Dear Ms. Wilcox:

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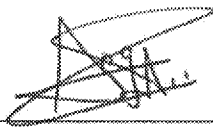
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I hope that the City Council will approve this project quickly.

Sincerely,

Signature: _____



Name (Printed): Ana Lopez Albero

Email: analopezalbero@yahoo.es

1

**Letter
Albero
Response**

Ana Lopez Albero
February 4, 2020

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

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I hope that the City Council will approve this project quickly.

Sincerely,

Signature: 

Name (Printed): Danielle Baines

Email: Danielle.baines@me.com

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

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

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Sincerely,

Signature: 

Name (Printed): Eric Baines

Email: eric.baines@fastsigns.com

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

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

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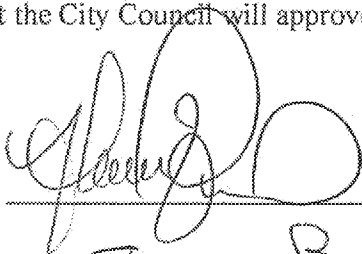
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I hope that the City Council will approve this project quickly.

Sincerely,

Signature:



Name (Printed): Thomas Bunn

Email: thomas@atgfilmz.com

1

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

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

Letter DeShay

February 4, 2020

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Sincerely,

Signature: 

Name (Printed): Desiree DeShay

Email: ~~desiree@askillya.com~~ ~~desiree@askillya.com~~
desiree@askillya.com

1

**Letter
Deshay
Response**

Desiree Deshay
February 4, 2020

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

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I hope that the City Council will approve this project quickly.

Sincerely,

Signature: 

Name (Printed): Dionne Faulk

Email: email-dionne@yahoo.com

1

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

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

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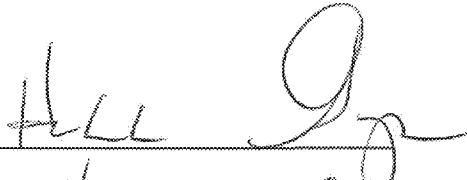
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Sincerely,

Signature:



Name (Printed):

Haimel Ginyard

Email:

haimelginyard@co.ingl.ca

1

**Letter
Ginyard3
Response**

Halimah Ginyard
February 4, 2020

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

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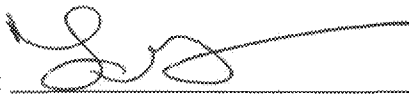
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Sincerely,

Signature: 

Name (Printed): LATAWNYA GREEN

Email: latawnya.green@gmail.com

1

**Letter
Green1
Response**

LaTaunya Green
February 4, 2020

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

February 4, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

As chair of the Inglewood/Airport Area Chamber of Commerce's Education Committee, I am proud to support the Inglewood Basketball and Entertainment Center and respectfully ask for approval of the draft environmental impact report. We are so encouraged that the LA Clippers are committed to providing benefits to the community beyond the arena campus, including scholarship for our City's youths.

The Chamber's Education Committee works to enhance the educational experience by linking academics, business and community to promote real world learning, support partnerships, and encourage and celebrate educational excellence in our schools. Our work includes the celebration of learning through mentorship, internships and partnerships. We are dedicated to building bridges between stakeholders in our children's future through community passion and awareness.

Through construction of the Inglewood Basketball and Entertainment Center, the developer has proposed a \$100 million community benefits package that includes \$12.75 million for youth and education funding. This money will go toward design and coding camps, high school drop-out prevention program, post-secondary counseling and college scholarships for low-income high school graduates. What is so incredible about this money is that it creates tangible benefits for Inglewood residents regardless of their interest in the LA Clippers, professional basketball or this development. It shows that the team will put its money where its mouth is when it comes to being a good community partner.

I am so proud to be a part of a community where we are controlling our own destiny, building partnerships and investing in our young people.

Regards,



Dexter Hall
Co-Chair of the Education Committee
Inglewood/Airport Area Chamber of Commerce

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

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

February 4, 2020

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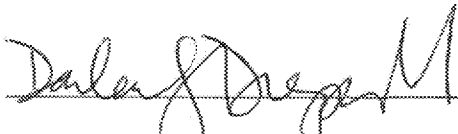
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I hope that the City Council will approve this project quickly.

Sincerely,

Signature:



Name (Printed):

Darlene J. Draper Martin

Email:

djdrapermartin@gmail.com

**Letter
Martin1
Response**

Darlene J. Draper Martin
February 4, 2020

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

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I hope that the City Council will approve this project quickly.

Sincerely,

Signature:



Name (Printed):

DARWIN SCOTT

Email:

TELEESIS35@GMAIL.COM

1

**Letter
Scott1
Response**

Darwin Scott
February 4, 2020

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

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Sincerely,

Signature: _____



Name (Printed): _____

CHIBUZO WALTON

Email: _____

chibbywalt@aol.com

1

**Letter
Walton2
Response**

Chibuzo Walton
February 4, 2020

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

February 5, 2020

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Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

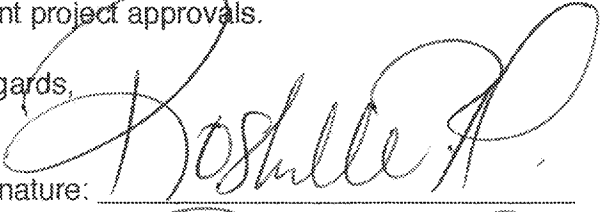
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Regards,

Signature: 

Name (Printed):

ROSHELLE BAILEY
Email: ROLLINGNPINK@YAHOO.COM

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

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

February 5, 2020

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

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Regards,

Signature:  _____

Name (Printed): Danielle Baines

Email: Danielle.baines@fastsigns.com

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

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

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Regards,

Signature: 

Name (Printed): Eric Baines

Email: eric.baines@pastsigns.com

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

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

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Regards,

Signature

Name (Printed):

Email:

Holli Carr
Holli M Carr
Holli M Carr@gmail

Letter Carr2 Holli Carr
Response February 5, 2020

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

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Regards,

Signature: Starla Cameron

Name (Printed): STARLA CAMERON

Email: STARLACAMERON@ATT.NET

**Letter
Cameron
Response**

Starla Cameron
February 5, 2020

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

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Regards,

Signature:

Name (Printed):

Email:


WANDA DAILEY
WANDA.DAILEY@INGLEWOOD.CA.GOV

1

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

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

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Regards,

Signature: Edward Edwards

Name (Printed): EDWARD EDWARDS

Email: EDWARD AND EDWARD2@GMAIL

1

**Letter
Edwards2
Response**

Edward Edwards
February 5, 2020

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

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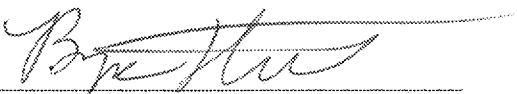
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Regards,

Signature: 

Name (Printed): Bryce Flueller

Email: Flueller825@msa.com

**Letter
Flueller
Response**

Bryce Flueller
February 5, 2020

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

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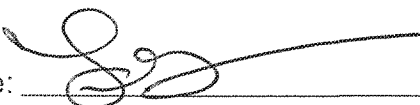
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Regards,

Signature:  _____

Name (Printed): LA TAWNIA GREER

Email: latawnia.greer@gmail.com

**Letter
Green2
Response**

LaTaunya Green
February 5, 2020

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

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Regards,

Signature:



Name (Printed):

Michelle Hicks

Email:

MHicks1830@AOL.com

1

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

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

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Regards,

Signature: 

Name (Printed): Louie Holmes

Email: mr.louieholmes@phoo.co

1

**Letter
Holmes2
Response**

Louise Holmes
February 5, 2020

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

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Regards,

Signature:  _____

Name (Printed): Cynthia Jackson

Email: Cynjack@gmail.com

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

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

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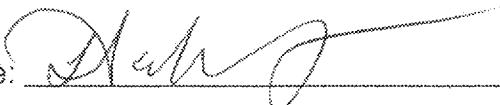
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Regards,

Signature: 

Name (Printed): Haskel Jackson

Email: haskel.jacksonje@gmail.com

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

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

Letter J. Jameson

February 5, 2020

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Regards,

Signature:



Name (Printed):

JOHNNIE JAMESON

Email:

MARKSTHONJOHNNIE@YAHOO.COM

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

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

Letter S. Jameson

February 5, 2020

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Regards,

Signature: 

Name (Printed): Sheryl Jameson

Email: WEPLAYBASKET@YAHOO.COM

1

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

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

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Regards,

Signature: 

Name (Printed): DEBORAH JENNINGS-MAU

Email: plasticdebbie10@gmail.com

1

**Letter
Jennings-
Mau3
Response**

Deborah Jennings-Mau
February 5, 2020

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

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Regards,

Signature: Cheryl McClellan

Name (Printed): Cheryl McClellan

Email: bmiles492@yahoo.com

**Letter
McClellen
Response**

Cheryl McClellen
February 5, 2020

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This development will continue the tremendous economic renaissance Inglewood is experiencing. This arena will be our community jobs. This arena will bring our community new tax revenue. And this arena will be a major boon to small businesses throughout Inglewood.

The draft EIR outlines how the families of Inglewood will be protected during the construction and operation of the arena. I am pleased to see that the project will include transportation system improvements, a transportation demand management plan, and an innovative, modern design that incorporates sound barriers around the site. The project also includes a lighting design plan to shield and redirect lighting and limit the intensity of certain lighting and signage near homes.

My community deserves the benefits that accompany the Inglewood Basketball and Entertainment Center. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature: Sylvester Mitchell

Name (Printed): SYLVESTER MITCHELL

Email: MITCHELLS@GMAIL.COM

1

**Letter
Mitchell
Response**

Sylvester Mitchell
February 5, 2020

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

February 5, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

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Regards,

Signature:



, Keller Williams Realty,
Inglewood

Name (Printed):

HEATHER PRESHA

Email:

heather@preshaproperties.com

**Letter
Presha2
Response**

Heather Presha
February 5, 2020

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

February 5, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

Re: Inglewood Basketball and Entertainment Center Draft EIR

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Regards,

Signature: Aisha Spikes

Name (Printed): Aisha Spikes

Email: aishaspikes79@gmail.com

1

**Letter
Spikes
Response**

Aisha Spikes
February 5, 2020

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

February 5, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

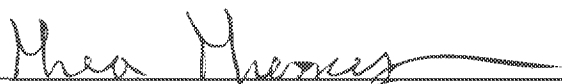
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Regards,

Signature: 

Name (Printed): THEO THOMAS

Email: THEO123093@yahoo.com

Letter
T. Thomas
Response

Theo Thomas
February 5, 2020

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

February 5, 2020

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Inglewood, CA 90301

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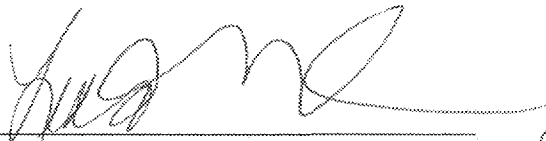
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Regards,

Signature:



Name (Printed):

Lisa Wright

Email:

Lnwright1@yahoo

**Letter
Wright
Response**

Lisa Wright
February 5, 2020

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

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR–Sustainability

Dear Ms. Wilcox,

I enthusiastically support the Inglewood Basketball and Entertainment Center and ask the City to approve the project's draft environmental impact report (EIR).

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I support the draft EIR and hope the City will as well.

Regards,

Signature: 

Name (Printed): Eric Baines

Email: eric.baines@fastsigns.com

1

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

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

Feb. 9, 2020

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City of Inglewood, Planning Division
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Inglewood, CA 90301

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I support the draft EIR and hope the City will as well.

Regards,

Signature: Angela Boles

Name (Printed): Angela Boles

Email: angelaboles@aol.com

**Letter
Boles3
Response**

Angela Boles
February 9, 2020

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

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

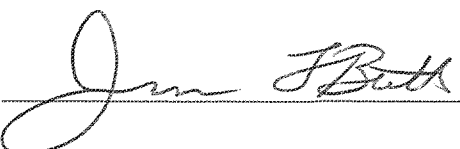
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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature: 

Name (Printed): JAMES T. BUTTS

Email: MAYOR.JAMESBUTTS@CMAIL.COM

**Letter
Butts1
Response**

James T. Butts
February 9, 2020

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

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR--Sustainability

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I support the draft EIR and hope the City will as well.

Regards,

Signature: Holli M Carr

Name (Printed): Holli M Carr

Email: Holli M Carr@gmail

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

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

Feb. 9, 2020

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City of Inglewood, Planning Division
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Inglewood, CA 90301

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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature: Holli M Carr

Name (Printed): Holli Carr

Email: Holli M Carr@gmail.com

1

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

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

Feb. 9, 2020

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Inglewood, CA 90301

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Regards,

Signature: 

Name (Printed): DEXTER HALL

Email: DEXTERHALL31@YAHOO.COM

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

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

Feb. 9, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

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I support the draft EIR and hope the City will as well.

Regards,



Tiffany Hinton
Chief Administrative Officer- Motev

**Letter
Hinton
Response**

Tiffany Hinton
February 9, 2020

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

Feb. 9, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

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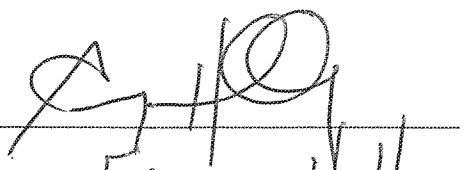
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Regards,

Signature: 
Name (Printed): ERICK HOLLY
Email: eholly5@gmail.com

1

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

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

Feb. 9, 2020

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I support the draft EIR and hope the City will as well.

Regards,

Signature: 

Name (Printed): Louise Holmes

Email: mr.louise.holmes@yahoo.com

**Letter
Holmes3
Response**

Louise Holmes
February 9, 2020

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

Letter Johnson

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

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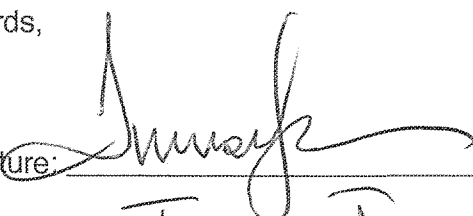
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Regards,

Signature: 

Name (Printed): TUNISIA JOHNSON

Email: tunisiajohnson@gmail.com

**Letter
Johnson
Response**

Tunisia Johnson
February 9, 2020

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

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Regards,

Signature: *Darlene J. Draper M*
Name (Printed): *Darlene Draper Martin*
Email: *djdrapermartin@gmail.com*.

**Letter
Martin2
Response**

Darlene J. Draper Martin
February 9, 2020

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

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Regards,

Signature: *Dana C. Pearson*

Name (Printed): *Dana C. Pearson*

Email: *Dana@bagfundgroup.com*

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

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

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

As a resident of Inglewood, I am writing in support of the Inglewood Basketball and Entertainment Center project. I respectfully ask that you respond to comments of the draft Environmental Impact Report (EIR) in a timely manner and schedule public hearings on the project as soon as possible.

The draft EIR is an exceptionally detailed, transparent document with extensive supporting studies and scientifically researched data points. This document is extremely thorough and conservative in analyzing the impacts of the project. I was also pleased to see so many detailed neighborhood protections, both during construction and during operation of the arena.

Through commitments such as the construction management plan, limiting emissions from diesel engines and equipment during construction, and a requirement to shield or redirect lighting during construction, the developer has shown a true commitment to the health and safety of Inglewood. That is in addition to the \$100 million community benefits package that allocates funds for housing, scholarships and libraries.

The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature:  _____

Name (Printed): Michael Prudent

Email: Michael@prudentsecurityfirst.com

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

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

Feb. 9, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature: Tasha L. Prudent

Name (Printed): Tashana Prudent

Email: Lprudent@PrudentSecurityFirst.com

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

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

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature: 

Name (Printed): DELT RICHARDSON

Email: del.Richardson@cityofinglewood.com

1

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

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

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City of Inglewood, Planning Division
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Inglewood, CA 90301

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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature: 

Name (Printed): DARWIN SCOTT

Email: TEKESIS35@GMAIL.COM

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**Letter
Scott2
Response**

Darwin Scott
February 9, 2020

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

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature: Andrea Strong

Name (Printed): Andrea Strong

Email: rstrong.fam@benzon.net

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**Letter
Strong
Response**

Andrea Strong
February 9, 2020

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

Letter Re. Thompson

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

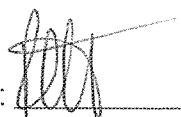
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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature:  _____

Name (Printed): Renee Thompson

Email: rendabney@sbcglobal.net

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

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

Letter Ri. Thompson

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature:  _____

Name (Printed): RICHARD THOMPSON

Email: RTThompson745@gmail.com

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

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

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

Signature: Tarron Wiley

Name (Printed): TARRON WILEY

Email: TMETTWILEY@SBCGLOBAL.NET

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

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

Feb. 9, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR–Sustainability

Dear Ms. Wilcox,

I enthusiastically support the Inglewood Basketball and Entertainment Center and ask the City to approve the project's draft environmental impact report (EIR).

For more than 20 years, the land at Prairie Avenue and Century Boulevard has been vacant — it's ugly and it does not generate any benefits for Inglewood. But now we have a project that will create jobs, generate new tax revenue and also deliver a \$100 million community benefits package.

It is my understanding that this will be one of the most environmentally friendly and energy efficient sports venues in the country. The EIR is extremely thorough and provides innovative solutions to complex environmental challenges. It will be net zero for greenhouse gas emissions and achieve the most stringent environmental standards in state history for a sports venue. The draft EIR contains the details about how this will be accomplished, including the mitigation measures to make sure that the City gets the benefits of these standards.

I support the draft EIR and hope the City will as well.

Regards,

Signature: Sam Williams

Name (Printed): Sam Williams

Email: Samdaslam@yahoo.com

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**Letter
Williams2
Response**

Sam Williams
February 9, 2020

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

February 24, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

I am proud to support the Inglewood Basketball and Entertainment Center and respectfully ask that you review and approve the draft environmental impact report (EIR).

This development will continue the tremendous economic renaissance Inglewood is experiencing. This arena will be our community jobs. This arena will bring our community new tax revenue. And this arena will be a major boon to small businesses throughout Inglewood.

The draft EIR outlines how the families of Inglewood will be protected during the construction and operation of the arena. I am pleased to see that the project will include transportation system improvements, a transportation demand management plan, and an innovative, modern design that incorporates sound barriers around the site. The project also includes a lighting design plan to shield and redirect lighting and limit the intensity of certain lighting and signage near homes.

My community deserves the benefits that accompany the Inglewood Basketball and Entertainment Center. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

*Christopher M. Agrella - H B W
CLIPPER FAN & STH (when I could afford it,
since 1988 LOL!)*

1

**Letter
Agrella
Response**

Christopher Agrella
February 24, 2020

Agrella-1

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

February 24, 2020

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Inglewood, CA 90301

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Regards,



1

**Letter
Anuluoha
Response**

Nyambo Anuluoha
February 24, 2020

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Feb. 24, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

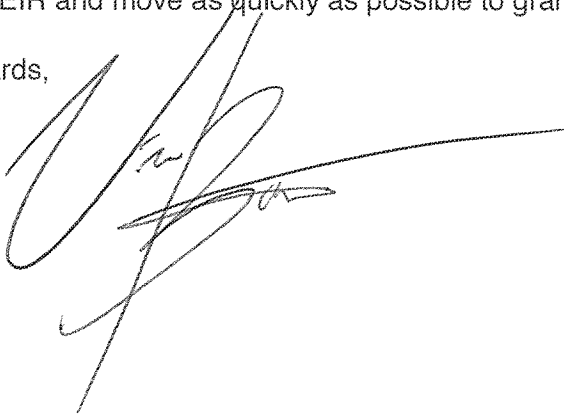
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Regards,



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

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

February 24, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

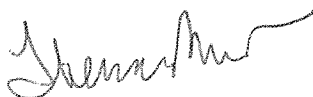
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My community deserves the benefits that accompany the Inglewood Basketball and Entertainment Center. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,



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

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

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Inglewood, CA 90301

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My community deserves the benefits that accompany the Inglewood Basketball and Entertainment Center. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

I support the new stadium for the Clippers
Tony Burnett - Promoter

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**Letter
Burnett
Response**

Tony Burnett
February 24, 2020

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

Feb. 24, 2020

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City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301

Re: Inglewood Basketball and Entertainment Center Draft EIR

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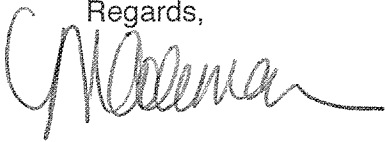
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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,



**Letter
Coleman
Response**

Mai Coleman
February 24, 2020

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

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Inglewood, CA 90301

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Regards,

Stephen Cotton

**Letter
Cotton
Response**

Stephen Cotton
February 24, 2020

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

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

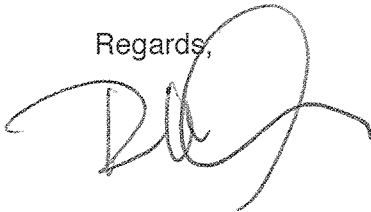
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The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

A handwritten signature in black ink, appearing to be 'D. Curtis', written over the word 'Regards,'.

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

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

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Regards,



St. John's Chrysostom Catholic School

1

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

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

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

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Regards,

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

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Regards,

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

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Regards,



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

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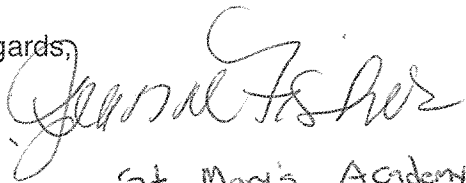
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Regards,


St. Mary's Academy

1

**Letter
Fischer
Response**

Jeanne Fischer
February 24, 2020

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Regards,


Inglewood Business Owner

1

**Letter
Gamble
Response**

Ana Gamble
February 24, 2020

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Regards,



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**Letter
Ginyard4
Response**

Halimah Ginyard
February 24, 2020

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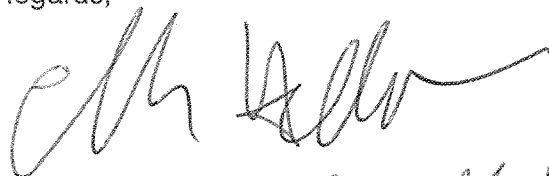
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Director of Sales + Marketing

Clowse Plaza LAX hotel

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

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Letter
L. Jackson
Response

Lu Jackson
February 24, 2020

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Regards,

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**Letter
Jarreau
Response**

RJ Jarreau
February 24, 2020

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Regards,

Danielle Lew


danielle@moderntimesinc.com

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**Letter Lew
Response**

Danielle Lew
February 24, 2020

Lew-1

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**Letter
Marrafino
Response**

Michaela Marrafino
February 24, 2020

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Regards,


RETIREE LAPD

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**Letter
Nelson
Response**

Stephan Nelson
February 24, 2020

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

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Regards,



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**Letter
R. Smith
Response**

Robert Smith
February 24, 2020

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**Letter
D. Thomas
Response**

Dei Thomas
February 24, 2020

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

Feb. 24, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

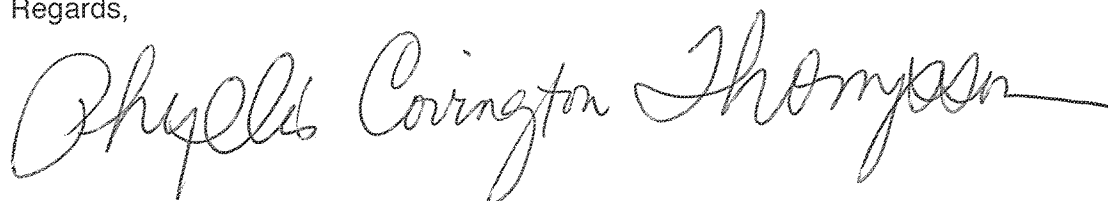
As a resident of Inglewood, I am writing in support of the Inglewood Basketball and Entertainment Center project. I respectfully ask that you respond to comments of the draft Environmental Impact Report (EIR) in a timely manner and schedule public hearings on the project as soon as possible.

The draft EIR is an exceptionally detailed, transparent document with extensive supporting studies and scientifically researched data points. This document is extremely thorough and conservative in analyzing the impacts of the project. I was also pleased to see so many detailed neighborhood protections, both during construction and during operation of the arena.

Through commitments such as the construction management plan, limiting emissions from diesel engines and equipment during construction, and a requirement to shield or redirect lighting during construction, the developer has shown a true commitment to the health and safety of Inglewood. That is in addition to the \$100 million community benefits package that allocates funds for housing, scholarships and libraries.

The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,



Phyllis Covington Thompson

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

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

Feb. 24, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

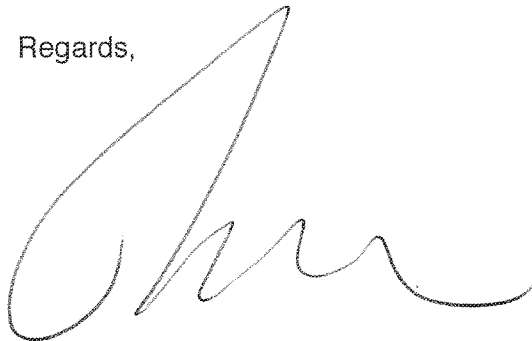
As a resident of Inglewood, I am writing in support of the Inglewood Basketball and Entertainment Center project. I respectfully ask that you respond to comments of the draft Environmental Impact Report (EIR) in a timely manner and schedule public hearings on the project as soon as possible.

The draft EIR is an exceptionally detailed, transparent document with extensive supporting studies and scientifically researched data points. This document is extremely thorough and conservative in analyzing the impacts of the project. I was also pleased to see so many detailed neighborhood protections, both during construction and during operation of the arena.

Through commitments such as the construction management plan, limiting emissions from diesel engines and equipment during construction, and a requirement to shield or redirect lighting during construction, the developer has shown a true commitment to the health and safety of Inglewood. That is in addition to the \$100 million community benefits package that allocates funds for housing, scholarships and libraries.

The draft EIR is an exciting and major step forward in the project. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

A handwritten signature in black ink, appearing to be 'John', written in a cursive style.

1

**Letter
Velasco
Response**

Nathan Velasco
February 24, 2020

Velaso-1

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

February 24, 2020

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

Re: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

I am proud to support the Inglewood Basketball and Entertainment Center and respectfully ask that you review and approve the draft environmental impact report (EIR).

This development will continue the tremendous economic renaissance Inglewood is experiencing. This arena will be our community jobs. This arena will bring our community new tax revenue. And this arena will be a major boon to small businesses throughout Inglewood.

The draft EIR outlines how the families of Inglewood will be protected during the construction and operation of the arena. I am pleased to see that the project will include transportation system improvements, a transportation demand management plan, and an innovative, modern design that incorporates sound barriers around the site. The project also includes a lighting design plan to shield and redirect lighting and limit the intensity of certain lighting and signage near homes.

My community deserves the benefits that accompany the Inglewood Basketball and Entertainment Center. I urge you to approve this draft EIR and move as quickly as possible to grant project approvals.

Regards,

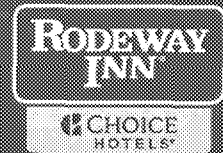
Karen Vetter
St. Mary's Academy

1

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

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

Good night.
Great savings.



March 5, 2020

Mindy Wilcox, AICP, Planning Manager
City of Inglewood, Planning Division
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301
ibecproject@cityofinglewood.org

Re: Draft Environmental Impact Report for the Inglewood Basketball and Entertainment Center Project

Dear Ms. Wilcox:

Thank you for the opportunity to comment on the Draft Environmental Impact Report ("EIR") that the City of Inglewood ("City") has prepared for the proposed Inglewood Basketball and Entertainment Center project ("Project"). I write on behalf of Bhagat Investments - Century, LLC, the owner of the existing Rodeway Inn located at 3940 West Century Boulevard in the City ("Rodeway Inn"). If approved, the Project would result in the demolition of the Rodeway Inn.

1

Rodeway Inn is generally supportive of the Project, and at this time, does not have any comments on the Draft EIR. However, Rodeway Inn expressly reserves all its rights to make substantive comments relating to the Project in the future, specifically including but not limited to comments on the Final EIR and otherwise concerning the City's analysis of the Project's impacts pursuant to CEQA.

2

Going forward, Rodeway Inn requests (i) copies of all public notices relating to the Project, including any notices concerning the Final EIR, and (ii) to be added to any City list of entities that have requested all public notices related to the Project. Such notices can be sent to the undersigned at JIG777@outlook.com or 3940 West Century Blvd. Inglewood, CA 90303, although electronic notification is preferred. Thank you for your consideration.

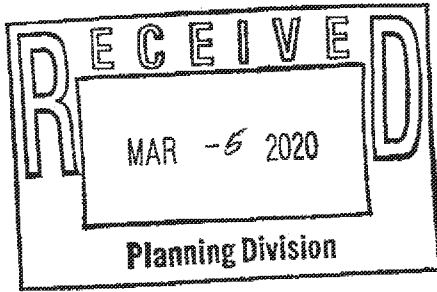
3

Sincerely,

Jignesh Patel
Member

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

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



Andrew Gerson
P.O. Box 735
Harbor City, CA 90710
andygers@pacbell.net
cell: (310)291-0987

March 4, 2020

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

Subject: Response to the Environmental Impact Report for the Inglewood Basketball and Entertainment Center

Dear Ms. Wilcox,

As the owner of a multi-unit residential property located slightly to the east of the proposed project (10306 Doty Avenue, Units 3,4,5,6, Inglewood, CA 90303), I have an opinion as well as some concerns that I would like to see addressed.

I really think that the project location should be where the Forum currently stands as there are strong rumors that the Clippers owner is purchasing the Forum. The Forum lies on 29 acres of one solid piece of land that has parking and easy access already in place as well as superior Ingress/Egress.

That being said, I strongly feel that you have put a lot of effort into planning on putting the arena in your proposed location.

I am assuming that the arena will be built and probably on time.

My main concerns are that the area affected the most by the arena project should receive some sort of consideration/remediation to mitigate the impact of the project before, during and after its construction .

I specifically request that all housing units in the area described as between Prarie Avenue on the western border, Yukon Avenue on the eastern border, 102nd Street on the north border and 104th Street on the south border, be offered environmental upgrades



including but not limited to sound insulation, air conditioning/ventilation, new windows and filtration to offset the significant increases in noise, vibration and pollution that are mentioned in the EIR. These upgrades should be offered by and paid for by the owner of the Clippers or the developer of the project. However, only the owners of the houses and apartments who wish to accept the upgrade offers would receive them.

These upgrades would greatly enhance the living conditions in the area and improve the health, safety and moral of the property owners and tenants alike, many of whom have lived there for over thirty years.

The arena project looks very impressive. Thanks for your consideration. Please feel free to contact me by mail, phone or email with any comments.

Sincerely,

Andrew W. Gerson

Andrew Gerson

↑
4
(cont.)
5

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

- Gerson-1 This introductory comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments Gerson-2 through Gerson-4.
- Gerson-2 The Draft EIR addressed the environmental effects of the Proposed Project at the Project Site, which is the project applicant's proposed location. As required under CEQA, the Draft EIR considered the comparative environmental effects of a reasonable range of potentially feasible alternatives to the Proposed Project. Because some of those significant impacts identified are both unavoidable and related to conditions in and around the Project Site, the Draft EIR addressed five (5) alternatives involving the construction of a project that would potentially accomplish most of the basic objectives of the Proposed Project but at a different location in the City or region.
- Alternative 7 (see Draft EIR, pages 6-81 through 6-96), analyzes the comparative impacts of locating the Proposed Project on the current site of The Forum. This analysis explores the potential to avoid or substantially lessen one or more significant environmental impacts of the Proposed Project, including the transportation-related impacts associated with concurrent events at the existing Forum venue and the Proposed Project. Alternative 7 anticipates demolition of The Forum because The Forum building is substantially smaller than, and does not include the features and amenities provided in, modern NBA arenas (see Draft EIR, page 6-83). A description of Alternative 7 is found starting on page 6-81 of the Draft EIR, and a comparative analysis of environmental effects of Alternative 7 is provided starting on page 6-86 of the Draft EIR.
- In addition to The Forum building, The Forum site has physical capacity for up to 3,530 parking spaces. Due to current site constraints such as storage and other uses, approximately 2,500 spaces are available for private vehicle parking and 500 spaces are usable for Transportation Network Companies (TNCs), such as Uber and Lyft, during events at The Forum. As discussed on page 6-85 of the Draft EIR, construction and operation of the proposed Arena on The Forum site would require 4,125 on-site parking spaces, which would result in a net increase of 567 spaces on The Forum site. A majority of these spaces would be provided

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

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

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

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

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

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

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

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

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

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

Air Quality

Construction

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

(VOCs) and oxides of nitrogen (NO_x). The Proposed Project would include a number of project design features to reduce emissions during construction, including the use of off-road diesel-powered construction equipment that meets or exceeds CARB and US EPA Tier 4 Final off-road emissions standards or equivalent, and the use of low-VOC architectural coatings (see detailed description of these design features on page 3.2-64 of the Draft EIR). Localized impacts, as presented in Tables 3.2-25 and 3.2-26 (see Draft EIR, pages 3.2-91 and -92), demonstrate that the nearby sensitive land uses, such as the homes on Doty Avenue listed in the comment, would not be exposed to pollutant concentrations in excess of applicable ambient air standards.

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

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

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

Enhanced filtration that would result from installation of new air conditioning or ventilation systems has been found to be effective, but only for particulate emissions, and only when combined with inoperable windows. The South Coast Air Quality Management District (SCAQMD) acknowledges that “filters are only effective when assumed to operate 100 percent of the time while residents are indoors and does not account for the times when the residents would have their windows or doors open. The use of these filters would also require HVAC systems to be running which would include an increase in energy cost to the resident. Lastly, filters have no ability to filter out any toxic gasses commonly generated from vehicle exhaust”.⁶⁷ In addition, as noted in the comment, not all other property owners or residents may accept the upgrade offers.

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

Operation

As presented in Tables 3.2-15 through -23 (see Draft EIR, pages 3.2-76 to -80), operation of the Proposed Project would result in emissions in excess of applicable mass emission thresholds for volatile organic compounds (VOC), nitrogen oxides (NO_x), carbon monoxide (CO), and particulate matter (PM₁₀ and PM_{2.5}). The Draft EIR also presents the results of refined localized impact assessments of Proposed Project-generated concentrations of NO₂, CO, PM₁₀, and PM_{2.5} at air quality sensitive receptor locations surrounding the Project Site (see Draft EIR, pages 3.2-91 to 3.2-94). Dispersion modeling demonstrates that Proposed Project-generated emissions of NO₂, CO, PM₁₀, and PM_{2.5} would not result in exceedances of applicable standards at any sensitive land uses (i.e., residences) in the vicinity of the Project Site. Additionally, as shown in Tables 3.2-31 through -35, health risks from construction and operation of the Proposed Project would not result in significant health impacts. These analyses demonstrate that while the Proposed Project would generate regional emissions

⁶⁷ South Coast Air Quality Management District, Draft Environmental Impact Report (DEIR) for the Pepper Avenue Specific Plan (State Clearinghouse No.: 2016021047), April 21, 2017.

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

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

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

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

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

exterior.⁶⁸ Therefore, inoperable or un-openable windows in homes, particularly in bedrooms, are not considered feasible in residential units in the vicinity of the Project Site. Finally, as noted in the comment, not all affected property owners or residents may accept the upgrade offers.

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

Noise

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

Construction

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

⁶⁸ California Building Code, 2019. Section 1030 Emergency Escape and Rescue. Available: <https://up.codes/viewer/california/ibc-2018/chapter/10/means-of-egress#1030>. Accessed May 2, 2020.

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

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

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

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

Mitigation Measure 3.11-1

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

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

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

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

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

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

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

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

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

Operation

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

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

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

Mitigation Measure 3.11-2(a)

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

The Operations Noise Reduction Plan shall include the following:

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

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

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

Project-related traffic noise level increases along the majority of the roadway segments in the area identified in the comment would be less than the 3 dBA significance threshold. Along segments of South Prairie Avenue, Yukon Avenue, and West 104th Street, traffic noise level increases as measured at the property line would be higher than 3 dBA under Major Event Post Event conditions, and thus would be significant. Specifically, all three roadways would experience significant traffic noise increases under the following conditions: Adjusted Baseline plus Major Event Weekday Post Event (see Figure 3.11-8); Adjusted Baseline plus Major Event Weekend Post Event (see Figure 3.11-9); Cumulative Plus Project Major Event Weekday Post Event (see Figure 3.11-21); Cumulative Plus Project Major Event Weekend Post Event (see Figure 3.11-22); Cumulative Stadium Mid-Sized Event Plus Forum Concert Plus Project Major Event Weekday Post Event (see Figure 3.11-23); and Cumulative Stadium NFL Game Plus Forum Concert Plus Project Major Event Weekend Post Event (see Figure 3.11-25). South Prairie Avenue and Yukon Avenue would experience significant traffic noise increases under the Adjusted Baseline Plus Stadium Mid-Sized Event Plus Forum Concert Plus Project Major Event Weekday Post Event condition (see Figure 3.11-10). South Prairie Avenue and West 104th Street would experience significant traffic noise increases under the Cumulative Stadium NFL Game Event Plus Forum Concert Plus Project Major Event Weekend Pre Event condition (see Figure 3.11-24). As discussed on page 3.11-137 of the Draft EIR, impacts related to Project-related traffic noise would occur during Major Event Post-Event conditions (9:30 PM to 10:30 PM) on weekdays and weekends which could generate significant traffic noise level increases up to 15 – 25 times a year. However, after post-event traffic leaves the Project area, affected roadway segments would no longer be exposed to elevated traffic noise due to major events hosted at the Proposed Project arena.

In order to mitigate traffic noise levels, the Draft EIR describes the implementation of a Transportation Demand Management (TDM) Program. The TDM Program described in Mitigation Measures 3.14-1(a) (see Draft EIR, page

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

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

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

The mitigation strategies suggested by the commenter, such as the addition of insulation or new windows, could reduce indoor noise levels from traffic-generated noise sources to varying degrees depending on the building

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

Vibration

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

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

Gerson-5

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

Letter Espinoza

From: [Nina Arroyo](#)
To: ibecproject@cityofinglewood.org
Subject: Murphy's Bowl - EIR comments
Date: Saturday, March 7, 2020 8:13:36 AM

To Whom It May Concern,

I am very excited about this project and am optimistic about its positive impact on the city of Inglewood. I live near the corner of 104th Street and Prairie, and I hope this project brings a lot of opportunity to our city. My questions and comments are regarding housing/rentals and transportation, please see below.

1

Transportation:

Ridesharing (Uber & Lyft) - Can any measures be done to improve cell phone internet connectivity near the project site? When events end at the Forum, there are many Uber and Lyft drivers available but concert-goers have no cell reception and therefore can't connect with the drivers. I believe this adds to the extreme congestion after events. I just feel like the shuttle services that are proposed will not be enough to mitigate transportation. I think if internet connection was improved, this would not only help relieve traffic but also provide a source of income for residents who live near the project.

2
3

Housing:

Short - Term Rentals (Airbnb, VRBO): Is the city going to allow residents to rent out their extra room(s) on short term rental websites? I understand some people are concerned about blocks of our city becoming Airbnb communities, but is there a way for residents to rent out a room/living room? When I asked the planning department they said this is not allowed in our city. I think that would be a great opportunity for residents to benefit economically, especially during events that draw large crowds.

4

Additional Dwelling Units (ADU's) - Some areas near the stadium are zoned as industrial areas and therefore cannot build ADU's. Are you considering re-evaluating the zoning requirement for the surrounding area? I think this needs to be re-evaluated because I believe allowing ADU's will help the housing shortage.

5

Overall, I look forward to your project and hope this will benefit our community.

6

Thank you,

Nina Espinoza

**Letter
Espinoza
Response**

Nina Espinoza
March 7, 2020

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

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

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

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

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

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

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

It further states:

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

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

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

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

Espinoza-3

Please see Response to Comment Espinoza-2.

Espinoza-4

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

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

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

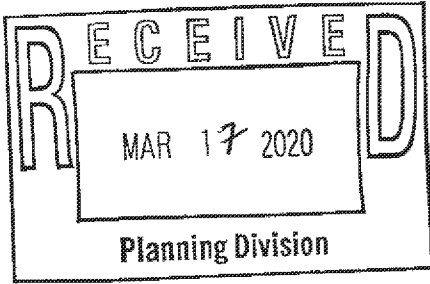
Espinoza-5 The Project Site does not include existing housing. The Proposed Project does not propose to include housing. The Proposed Project also does not include rezoning industrial sites in nearby areas to allow accessory dwelling units. Thus, any effects on housing or affordability would be indirect.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

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

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

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

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



L. Diane Sambrano
3640 W 111th Place
Inglewood, Ca. 90303

City of Inglewood Planning Department
One Manchester Blvd. Inglewood Ca
Murphy's Bowl Entertainment Center Environmental Response

That the environmental impact report contains an assortment of truly laughable statements is no surprise.

1

To believe that the project will not proceed is completely unrealistic. Many dollars that have been spent by the recently "interested in Inglewood" Billionaires to assure that "their will be done" no matter the cost to those impacted in the community. There are many who have been rewarded handsomely for efforts to make their sports dreams come true – unfortunately this will be at the expense of the local community members who apparently matter very little if at all.

2

It is unfortunate that so many lives will be negatively impacted and they are not even a consideration in an "environmental" impact report. Likewise it is sad that the area was manipulated to provide the false impressions desired by those who will reap rewards. This report stands as testimony that those who pay for the report will influence what it includes and what it does not. Monitors far, far away, selective historic references, and lack of recognition that it is not an isolated project impact the perception given. The area surrounding this project has been treated like a battered wife whose spouse would happily kill off if not for the bad press.

3
4

It is unfortunate that so many misrepresentations have been made and such great lengths have been taken to keep the public from awareness and genuine participation in the community's future through the democratic process as prescribed by the Ralph M Brown Act. (special meetings conducted which barely met minimum notice requirements/ incomplete staff reports with pages containing only "to be added" on the otherwise blank pages). The Murphy's Bowl project and its sister stadium project will impact every property owner and resident in the surrounding area which extends beyond the insulting limited 300 foot adjacent notification zone.

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Continuing the practice of keeping this back-room deal out of public awareness – that this report was released and the response time clock beginning while city hall was closed for holiday vacation is noteworthy. That it was made available at only two locations during limited hours or on-line when the community has an 85% free meals school population (home internet unlikely) is likewise revolting not to mention it was in a format not useable to anyone without additional computer programs to make it

7

readable is a testimony to the many avenues used to make it difficult to access. (Of course this is more laughable since the beneficiary is made his fortune with technology.)

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(cont.)

The original falsehood on YouTube that “Murphy’s bowl” was going to be a bowling alley (as in 9 pins and a heavy black ball) was a well put together example of those falsehoods -a fine production to persuade the community that the project the elected were working on was of minimal scope with no reason to believe those who bothered to read the staff reports associated with the special not on regular meeting day agendas were mistaken. That **this project was hidden with great effort by the elected until there was public outcry** (an later lawsuit) stands as testimony that the current council and state leaders know **this project’s legacy will be similar to the revolting actions taken in the Chavez Ravine dislocation and lack of social justice traditionally visited upon those of color and low income.**

8

Further having attended an assortment of meetings where the false and unlikely to ever be real “tech park” misrepresentation was alluded to in the cast aside the previously agreed upon parking facility makes the “pay to play” timeline reminiscent of Boss Tweed and Tammany Hall. Oh yes and with an additional gathering space there is even greater need for the already insufficient parking needs when the stadium fans employees arrive. Eentially the planners live in a fantasy to believe fans will not come in private cars (better have uber/lift make two trips and generate twice the pollution), go to the bathroom (water, water pray for rain), and oh yes never park in neighboring communities already stressed for space.

9

Despite the “shouting from the rooftop” claims there is no doubt many **public dollars** have been and will continue to be spent on “feel good items/events” to promote this project including press conferences, TV interviews, mailings, videos, city/cable broadcasts, wine and dines or coffee events to name a few of the “public relations” festivities and contracts for entertainment. Pesky well relocation might cost a dime or two also. There are of course coincidental political campaign contributions. Inglewood has simply become the newest Chavez Ravine-esk effort to further disenfranchise those of color and low income with the blessings of the elected, who are often dazzled by the promise of access to the wealthy and imagined acceptability to the “inner circle” of sports worship. In many cases elected have been persuaded to disregard any sense of doing that which is just or right for their constituents.

10

The significant false hoods contained in the environmental impact report (which almost didn’t get done thanks to the attempt to fast tract efforts taken in Sacramento), can be the stuff of Saturday Night Live Sketch . There is so much so poorly considered there is enough for a three hour comedy show but alas what is the point. Those who make the decisions who have limited/no moral character will happily negatively impact others if they can get a photo with a guy who gets paid to play with a ball. Simple examples-the Church’s Chicken Franchise on Century and Prairie per the EIR is purported to have *only 2.5 employees “per Square foot”* hmmm imagine could they deliver better/faster chicken if there were multiple times more per square foot? Hmmm, using the same mental image - imagine an arena hosting an event that would have more employees per square foot (?) wouldn’t the ticket purchasers feel a bit crowded? But then... an arena without an event in several days would have even fewer employees per square foot and the jobs likely seasonally generating living wage “full-time-equivalent” (AKA lots of part time only jobs)....Are we to believe those part-time-equivalent employees will be able

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to pay rent – oh wait, instead of focusing on paying rent we are to focus on their benefit - being able to be in the arena, they may not be able to afford a ticket to on the part time wage, the same time a game is being played – they may be able to see some of the games -at least when the guests don't need attention..

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12
(cont.)

The EIR declares there are NO residents in the Rodeway Inn impacted !!!! Perhaps this is the simple carry-over of true sentiments of the report writers, who were significant rewarded to discount, and devalue the community members at large. The management family (parents and children) is not even acknowledged !! Is that because they are Hospitality employees or because they are not wealthy- which renders them non-persons.

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13

We are told the project will be 100% funded by the private dollars - - - that seems almost laughable. Many remember the costly displacement engineered to make this space available by claiming airport incompatibility to attain "parcel assemblage." Greater noise impacted homes (then ungraciously called dwelling units) much closer to the airport remained in place while even closer to the airport-public dollars were granted to a Non-Profit housing group to build in the midst of removed (due to airport noise) apartment buildings. Public dollars have been spent for parcel assemblage. There is no mention of reimbursement of those funds spent in the preparing of this assemblage for the Sports plan which no community member in the area declared to be more important to them than their neighbors homes. This has already been very costly to hundreds of families.

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14

Many millions in eminent domain dollars have been spent to remove residents from their "dwelling units" through-out the years causing a great loss in student population to the local school district reducing the state funding allocation which was among the tear jerking cries for property tax increases for the remaining residents. YES, how this parcel assemblage area has evolved through the influence of outside forces and those put in office is important and significant. Without millionaire assistance those in elected office may have actually been participating members of the community who recognized their neighbors (constituents) as persons worthy of participation rather than shutting them out and turning off their microphones or intimidating them massive police presence.

Using SCAG (So Cal Assoc of Governments) as a resource for transportation related concerns is unfortunate given SCAGS failure to adequately deal with the need for Regional Air Transportation and the resulting ground access bottleneck in the area surrounding LAX just a short distance, 2 miles, from the "proposed site". There Will Be significant traffic impact because of the potential game watchers ! ANYONE Claiming that no impact must live in a cave far, far, away perhaps in a cave where planes, trains, and automobiles are things that appear in drawings brought in by perhaps camel or carrier pigeon. Really limited impact ! Consider the neighbor hosting a birthday party with only 2,000 guests. Not much different from that grade school project of trying to cram 5 pounds of sugar into and 8 ounce container.

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Traffic will impact the surrounding neighborhoods! As any community, which has dealt with the mobile phone "apps" which direct traffic through neighborhoods to avoid congestion, this project will

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make the community neighbors loose the opportunity to access their homes or jobs without having to check the "event/game schedule" and perhaps rearrange their budget for greater childcare dollars.

17
(cont.)

Of course, the key word used in the report is "Quality" neighborhoods, there implies no need to care not even an iota for homes not deemed of High-End enough merit to be declared "quality". Inglewood has been there and done that before -- one mayor disliked "seeing- mobile homes" and had them declared blighted, acquired by eminent-domain, turned down many feasible proposed uses which actually had community support, left apartment buildings empty perfect for crime generation and encouraging surrounding community members to "leave if you don't like it." All this.... yes, essentially promoting squatters and crime in order to justify proclaiming blight for the personal dream of a "sports zone in the hood".

18

Additionally, non-resident school "leaders" promoted the concept that "Sports is the only future concept" to younger minority residents in area schools telling them the proposed space "should be" a sports facility because sports is "THE Ticket for OUR Babies to get rich". Limiting student inspiration to become scientists, medical /legal /accounting/construction or educational professionals, or any other non-sports career somehow made the failure to provide textbooks and supplies for potential college ready students acceptable. The concept was so well promoted that among the first dollars spent of the building funds went into running tracks and playing fields, further generating a third class future to those not sports oriented.

19

Removal of broad leaf canopy trees has been the hallmark of recent years perhaps to use as a comparison for improvement perhaps it is hoped that once the new venue is in place the community will forget the old growth trees were cut down to avoid having to trim them -- impacting air pollution mitigation.

20

The failure to adequate provide for surface permeability is among the additional shortcomings along with the other geo issues of oil fields and earthquake zone (Perhaps this is why the entire bookcase once devoted to earthquake information along the Inglewood Newport fault has been reduced to very limited volumes in the Main Library once considered to have among the most significant collections -- recently sent to the landfill.

21

While purporting to address required issues this report is much like throwing out all the food in the pantry and filling the shelves with website addresses for recipes many words and little substance to sustain quality of life! Consider of the 25 volumes, only 3 made to the second library.

22

23

No, I won't be choking myself as per the Mayor's suggestion. Nor will I be leaving town as has been suggested. This is MY HOME and I ACTUALLY CARE about my community. I am confident as with many things I will be saying in the near future as before I TOLD YOU SO. Hmm how much has the foolish Human resource decision to promote now confirmed girl friends above skill level cost residents so far?

24

Sincerely,
L. Diane Sambrano
L. Diane Sambrano

oh and yes lack of Medical Hospital Issues

25

**Letter
Sambrano
Response**

L. Diane Sambrano
March 17, 2020

- Sambrano-1 This introductory comment does not raise environmental issues or an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project. Specific comments regarding the Draft EIR are provided and responded to in Responses to Comments Sambrano-2 through Sambrano-25.
- Sambrano-2 This comment expressing opposition to the Proposed Project does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.
- Sambrano-3 This comment incorrectly states that the lives of people impacted by the Proposed Project were not a consideration in the environmental impact report. The Draft EIR for the Proposed Project was written consistent with the CEQA Guidelines, which as required by PRC section 21083, includes criteria to determine “whether or not a proposed project may have a significant effect on the environment”, including if the “environmental effects of a project will cause substantial effects on human beings, either directly or indirectly.”
- Sambrano-4 This comment expressing opposition to the Proposed Project does not raise an issue specific to the Draft EIR and the environmental impacts addressed therein. This comment will be included as a part of the record and made available to the decision makers prior to a final decision on the Proposed Project.
- The comment expresses skepticism regarding the objectivity of the EIR’s analysis. The comment’s skepticism is noted. The City notes, however, that the analysis was prepared by professionals with expertise in the various subjects addressed by the EIR. These professionals worked under the direction of the City, not the project applicant. The EIR reflects a good-faith effort to provide a thorough, objective analysis of the Proposed Project’s impacts. The City does not believe that the analysis is tainted by improper motives. The comment’s skepticism in this regard is noted.
- This comment incorrectly states that the Draft EIR did not recognize that the Proposed Project is not an isolated project. The Draft EIR for the Proposed Project was written consistent with the CEQA Guidelines. CEQA Guidelines section 15130 requires that an EIR discuss cumulative impacts of a project when a project’s incremental effect is cumulatively considerable. As defined in CEQA Guidelines section 15355, a cumulative impact consists of an impact that is

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

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

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

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

Sambrano-6 The comment implies that the Proposed Project and the NFL Stadium project are joint projects, or somehow connected. The NFL Stadium is located in the "Hollywood Park Specific Plan" area. In addition, the NFL Stadium was approved by voter initiative and did not undergo an environmental analysis. While no CEQA analysis was conducted specifically for the NFL Stadium and the voter initiative, there was an environmental analysis conducted for the Hollywood Park Redevelopment Project and expansion of the entertainment district.⁶⁹ The Proposed Project, by contrast, is not within the Hollywood Park

⁶⁹ City of Inglewood, 2008. Hollywood Mixed-Use Project EIR. State Clearinghouse No. 2007111018.

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

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

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

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

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

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

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

Sambrano-9

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

As discussed on page 3.14-101 of the Draft EIR, the supply of parking in the three parking garages and at Hollywood Park and the Hollywood Park Casino is more than adequate to accommodate attendee and employee parking demands during major events at the Proposed Project (so long as an overlapping event at the NFL Stadium is not occurring). Parking on adjacent neighborhood streets

would primarily be due to attendees searching for free and/or closer parking, and not the result of inadequate overall off-street supply.

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

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

- Sambrano-10 The Proposed Project would be privately funded by the project applicant. A development agreement entered into between the City and the project applicant would outline the exact financial obligations the project applicant would contribute through development fees. Similarly, the development agreement would outline the terms for well relocation funding. Please see Response to Comment Sambrano-14.
- Sambrano-11 This comment expresses opposition to the Proposed Project, and raises questions about the veracity of the information in the Draft EIR. The Draft EIR prepared for the Proposed Project is an objective, accurate, and complete analysis of the potential environmental impacts that would or could result from

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

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

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

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

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

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

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

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

The Project Site is mostly vacant, and is partially developed with a fast-food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, a commercial catering business, and a groundwater well. The Project Site does not contain any residential or dwelling units within the site’s boundaries, and therefore has no permanent resident population. The City received an unsubstantiated comment letter implying that the motel’s manager resides in an apartment within the motel. If this statement is true, then the manager would be displaced at the time the motel is demolished. The motel use, however, is commercial rather than residential in character, and the availability of an apartment for the manager is not considered a permanent residence. In addition, the displacement of the manager from this apartment, should it occur, is not considered substantial. Existing employment at the Project Site is estimated to be approximately 119 people, as estimated below in Table 3.12 4.

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

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

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

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

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

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

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

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

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

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

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

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

Additionally, Mitigation Measure 3.14-2(a)(i) requires that the TMP reduce traffic volumes on local and collector street segments identified in the Draft EIR as having a significant impact without causing a significant impact on other

local and collector street segments. The measure must also discourage and reduce event-related cut-through traffic while maintaining access for residents and their guests.

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

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

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

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

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

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

Sambrano-20 As indicated in Draft EIR, Section 3.3, Biological Resources, page 3.3-7, a tree inventory was completed for the Project Site and included in Draft EIR,

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

Sambrano-21 As described in Draft EIR, Section 3.9, Hydrology and Water Quality, the Project Site is currently made up of approximately 15 percent impervious surfaces and 85 percent pervious surfaces. However, as detailed in Draft EIR, Section 3.9, Hydrology and Water Quality, Subsection 3.9.1, Environmental Setting, preliminary investigations of the Project Site indicate that the site's native soil characteristics have poor drainage with a low infiltration rate.⁷⁰ As described in Impact 3.9-2 beginning on page 3.9-24 of the Draft EIR, "the Proposed Project would include biofiltration planters and biofiltration systems, which can be effectively designed in low permeable soil conditions, to treat stormwater. Runoff would be directed from drainage areas to on-site biofiltration planters and bio-swales. The biofiltration systems would be designed to capture site runoff from roof drains, treat the runoff through biological reactions within the planter soil media, and discharge at a rate intended to replicate pre-developed conditions or better."

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

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

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

⁷⁰ AECOM, 2018. *Inglewood Basketball & Entertainment Center Project Low Impact Development (LID) Report*. August 23, 2018. p. 2.

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

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

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

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

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

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

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

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

Therefore, the commenter incorrectly states that only 3 of the 25 volumes of the Draft EIR were sent to the public libraries as the Draft EIR chapters were provided to both libraries in hard copy form; the appendices were also provided in hard copy form as well as on a flash/thumb drive. All three locations also provided online access to the complete Draft EIR, including all technical appendices.

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

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

Letter Samuel-Polk

From: [catherine samuel-polk](#)
To: [ibecproject](#)
Subject: Environmental Impact Report
Date: Friday, April 10, 2020 4:15:22 PM

Sent from my iPhone As a senior citizen resident in Inglewood, CA, I believe it will be a benefit to Inglewood but also the world. I look forward to being employed within the complex.

I 1

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

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

From: [Mindala Wilcox](#)
To: [Mindala Wilcox](#)
Subject: FW: Delete SPAM :Inglewood Basketball and Entertainment Center Draft EIR
Date: Thursday, April 2, 2020 7:45:25 AM

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: James Butts <thedriven1@gmail.com>
Date: 3/31/20 5:25 PM (GMT-08:00)
To: Mindala Wilcox <mwilcox@cityofinglewood.org>
Subject: Delete SPAM :Inglewood Basketball and Entertainment Center Draft EIR

CAUTION: This email is from outside of Inglewood with internal mail username. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mindy Wilcox, AICP, Planning Manager
Economic and Community Development Department
Planning Division
1 W. Manchester Blvd., 4th Floor
Inglewood, CA 90301

March 31, 2020

RE: Inglewood Basketball and Entertainment Center Draft EIR

Dear Ms. Wilcox,

In a letter to you dated February 6, 2020, I expressed, as a resident of the City of Inglewood, certain observations and comments about the Inglewood Basketball and Entertainment Center Draft EIR ("DEIR"). As a point of clarification, I want to make it abundantly clear that the observations and comments expressed by me in this letter were done so for the sole purpose of showing my support of the City's CEQA team effort in providing a very detailed and comprehensive level of CEQA-mandated information in the DEIR and its dissemination to the general public providing for an informed evaluation and review of the DEIR and the proposed project.

1

Regards,

James T. Butts
Resident

**Letter
Butts2
Response**

James T. Butts

April 2, 2020

Butts2-1

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