

CHAPTER 2

Revisions to the Draft EIR

2.1 Introduction

This chapter describes changes made to the Proposed Project since the publication of the Draft EIR as well as text changes made to the Draft EIR in response to a comment letter, a change initiated by City staff, or in response to a modification to the Proposed Project.

Under CEQA, recirculation of all or part of an EIR may be required if significant new information is added after public review and prior to certification. According to CEQA Guidelines section 15088.5(a), new information is not considered significant “unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” More specifically, the CEQA Guidelines define significant new information as including:

- A new significant environmental impact resulting from the project or from a new mitigation measure;
- A substantial increase in the severity of an environmental impact that would not be reduced to insignificance by adopted mitigation measures;
- A feasible project alternative or mitigation measure considerably different from those analyzed in the Draft EIR that would clearly lessen the environmental impacts of the project and which the project proponents decline to adopt; and
- A Draft EIR that is so fundamentally and basically inadequate and conclusory that meaningful public review and comment were precluded.

The changes to the Proposed Project and text changes described below update, refine, clarify, and amplify the project information and analyses presented in the Draft EIR. Pursuant to CEQA Guidelines section 15088.5, recirculation of a Draft EIR is required only if:

- 1) a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;
- 2) 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;

- 3) 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; or
- 4) the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

No new significant impacts are identified, and no information is provided that would involve a substantial increase in severity of a significant impact that would not be mitigated by measures agreed to by the project applicant. In addition, no feasible new or considerably different project alternatives or mitigation measures that the project applicant has declined to adopt have been identified. Finally, there are no changes or set of changes that would reflect fundamental inadequacies in the Draft EIR. Recirculation of any part of the EIR therefore is not required.

2.2 Text Changes to the Draft EIR

This section summarizes text changes made to the Draft EIR either in response to a comment letter, initiated by City staff, or in response to a modification to the Proposed Project. New text is indicated in double underline and text to be deleted is reflected by a ~~strike through~~. Text changes are presented in the page order in which they appear in the Draft EIR.

The text revisions provide clarification, amplification, and corrections that have been identified since publication of the Draft EIR. The text changes do not result in a change in the analysis or conclusions of the Draft EIR.

2.2.1 Summary

2.2.1.1 Changes in Response to Comments

Page S-56, Table S-2, line 1 is revised to read:

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.

Page S-72, Table S-2, line 4 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 HMD the 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 from the appropriate regulatory agency for a course of action that would allow that construction can commence to recommence within any such areas. The project applicant shall submit the "no further action" letter or equivalent notification documenting direction from the regulatory agency to the City prior to resumption of any ground disturbing activity on the relevant portion of the Project Site. If compounds in soil are identified in concentrations that trigger SCAQMD's Rules 1166 or 1466, the SMP will require compliance with such rules.

Page S-77, Table S-2, line 5 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.

Page S-78, Table S-2, lines 1 and 2 are revised to read:

Mitigation Measure 3.11-1

...

- 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.

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, 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.
- EquipDesign and install noise generating mechanical equipment, including such as emergency generators, transformers, and/or HVAC units with sound 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 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.~~

Page S-91 Table S-2, line 1 is revised to read:

Mitigation Measure 3.14-2(c)

The project applicant shall work with the City of Inglewood and the City of Los Angeles to implement capacity-increasing improvements at the West Century Boulevard/La Cienega Boulevard intersection. Recommended improvements include two elements:

- a) Restripe the westbound approach to convert the outside through/right lane to a dedicated right-turn lane and operate it with an overlap phase. This is consistent with the LAX Landside Modernization Program improvements planned for this location.
- b) Remove median island on the west leg and restripe the eastbound and westbound approaches to add second left-turn lanes in each direction.

Should these improvements be deemed infeasible, the 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.

Page S-92, Table S-2, last paragraph under Impact 3.14-2 is revised to read:

Mitigation Measure 3.14-2(o)

The project applicant shall make a funding contribution of \$12 million to the City of Inglewood Public Works Traffic Division to help fund and implement Intelligent Transportation Systems (ITS) improvements, including related enabling infrastructure, licensing software, control center and technology updates, related corridor enhancements and supporting ITS components, 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. 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.

Page S-92 Table S-2, line 1 is revised to read:

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.

Page S-93 Table S-2, line 1 is revised to read:

Mitigation Measure 3.14-3(j)

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.

Page S-94 Table S-2, line 6 is revised to read:

Mitigation Measure 3.14-3(b)

The project applicant shall ~~work with Caltrans to implement~~ provide a one-time contribution of \$1,500,000 to Caltrans towards implementation of the following traffic management system improvements along the I-105 corridor:

- a) Changeable message sign (CMS) on the eastbound I-105 between the I-405 connector ramp and the eastbound South Prairie Avenue off-ramp.
- b) CMS on the westbound I-105 between Vermont Avenue and the westbound Crenshaw Boulevard off-ramp.
- c) Closed circuit television cameras on the westbound Crenshaw Boulevard off-ramp, the South Prairie Avenue off-ramp, the westbound Hawthorne Boulevard off-ramp, and the eastbound 120th Street off-ramp to I-105.

Page S-97, Table S-2, line 2 is revised to add the following footnote:

Mitigation Measure 3.14-15

...

- g) Maintain safe and efficient access routes for emergency vehicles and transit.⁵

...

(Footnote 5: 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.)

Page S-100 Table S-2, line 1 is revised to read:

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

Page S-101 Table S-2, line 2 is revised to read:

Mitigation Measure 3.14-24(h)

The project applicant shall provide a one-time contribution of \$1,524,900 which represents a fair share contribution of funds towards Caltrans' I-405 Active Traffic Management (ATM)/Corridor Management (CM) project.

2.2.1.2 Staff-Initiated Changes

Page S-25, the second full paragraph, is revised to read:

The Project Site is currently developed with a fast-food restaurant, a motel, a light manufacturing/warehouse facility, a warehouse, and a groundwater well and related facilities. The Project Site does not contain any residences residential or dwelling units within the site's boundaries, and has no permanent and or existing residential population. The motel use may include a manager's unit, which would potentially displace the manager 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. Thus the Proposed Project would not directly or indirectly displace substantial numbers of existing people or housing units necessitating the construction of new housing elsewhere.

This change to Summary Chapter is being made to make the text consistent with revisions regarding population and housing that were made in response to comments provided in Chapter 3. See revisions made under Section 2.2.16, Section 3.12, Population, Employment, and Housing, below.

Page S-53, Table S-2, line 2, the third bullet is revised to read:

... **Mitigation Measure 3.1-2(a)**

...

- Designate a Community Affairs Liaison and ~~conspicuously post~~ create a telephone hotline and email address to reach this person's number, with contact information conspicuously posted around the 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 disturbances related to construction or security lighting.

The Community Affairs Liaison shall investigate, evaluate, and attempt to resolve ~~lighting receive all public complaints related to construction activities of the Project 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 complaint and undertaking all feasible measures to protect public health and safety.~~

- Document and respond to each lighting complaint.
- Attempt to contact the person(s) making the lighting complaint as soon as feasible and no later than one construction work day.
- Conduct a prompt investigation to attempt to determine if high-brightness construction-related lighting contributes a substantial amount of light spillover or glare related to the complaint.
- If it is reasonably determined by the Community Affairs Liaison that high-brightness construction-related lighting causes substantial spillover light or glare to a light-sensitive receptor, the Community Affairs Liaison shall identify and implement feasible measures to address the lighting complaint.

Examples of feasible measures that may be implemented include but are not limited to:

- Confirming construction lighting equipment and related direction and shielding devices are maintained per manufacturer's specifications;
- Ensuring construction lighting is not operated unnecessarily; and/or
- Evaluating and implementing feasible relocations of lighting equipment, alternatives to specific types of lighting equipment, or changes to direction and shielding equipment, as appropriate.

Page S-55, Table S-2, line 2 is revised to read:

Mitigation Measure 3.2-2(c)

The project applicant shall prepare and implement a Construction Emissions Minimization Plan. ~~Before a construction permit is issued~~ Prior to the issuance of a construction permit for each site or phase of the Project, as applicable, the project applicant shall submit the components of this plan associated with the construction activities being approved to the City Department of Public Works Economic and Community Development for review and approval. The plan shall detail compliance with the following requirements:

- 1) The Plan shall set forth in detail how the project applicant will implement Project Design Feature 3.2-1.
- 2) The Plan shall require construction contractor(s) to use off-road diesel- powered construction equipment that meets or exceeds California Air Resources Board (CARB) and US Environmental Protection Agency (EPA) Tier 4 off-road emissions standards, or equivalent, for equipment rated at 50 horsepower or greater. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters. This requirement 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. A copy of each unit's certified tier specification and CARB or South Coast Air Quality Management District operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. The City shall require quarterly reporting and provision of written documentation by contractors to ensure compliance, and shall conduct regular inspections to ensure compliance with these requirements.

...

Page S-60, Table S-2, line 1 is revised to read:

Mitigation Measure 3.4-1

...

- b) Cultural Resources Sensitivity Training. The qualified archaeologist and Native American Monitor shall conduct construction worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (ia), for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.

...

Page S-65, Table S-2, line 1 is revised to read:

Mitigation Measure 3.6-2

...

- a) Prepare, design, and implement a monitoring and mitigation program plan for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity will not affect Older Quaternary Alluvium, then no further mitigation is required.

...

Page S-66, Table S-2, line 1 is revised to read:

Mitigation Measure 3.7-1(a)

GHG Reduction Plan. Prior to the start of construction, the project applicant shall retain a qualified expert to prepare a GHG Reduction Plan (Plan). The City shall approve the expert retained for this purpose to confirm the consultant has the requisite expertise. Components of the Plan relevant to construction GHG emissions associated with the construction activities being approved shall be subject to review and approval by the City Building Official prior to issuance of a construction permit for such activities. Components of the of the Plan relevant to operational GHG emissions, including the annual GHG Verification Report process described below, shall be subject to review and approval by the City Building Official prior to issuance of the Certificate of Occupancy for the Arena.

The purpose of the Plan is to document the Proposed Project's GHG emissions, including emissions after Project-specific GHG reduction measures are implemented, and to determine the net incremental emission reductions required to meet the "no net new" GHG emissions threshold over the 30-year life of the Proposed Project. The Plan shall include a detailed description of the GHG emissions footprint for all operational components of the Proposed Project based on the best available operational and energy use data at time of approval and the latest and most up to date emissions modeling and estimation protocols and methods.

The GHG Reduction Plan shall include the following elements:

- 1) Project GHG Emissions. ...

Page S-70, Table S-2, line 1 is revised to read:

Mitigation Measure 3.7-1(a)(2)(A)

- d. The TDM Program shall 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 Project transportation characteristics, and advances in technology or infrastructure become available. Any changes to the TDM Program shall be subject to review and approval by the City Traffic Engineer. In reviewing any proposed changes to the TDM Program, the City Traffic Engineer shall ensure that the TDM Program, as revised, is equally or more effective in addressing the issues set forth above.

...

Page S-71, Table S-2, line 1 is revised to read:

Mitigation Measure 3.7-1(a)

The GHG Reduction Plan may include different, substitute GHG reduction measures that are equally effective or superior to those proposed above, as new technology and/or other feasible measures become available during construction or the operational life of the Project. The GHG Reduction Plan shall identify such different, substitute GHG reduction measures, and shall provide enough information to assess the feasibility of these measures. The project applicant may rely on such measures only if they are reviewed by the City Chief Building Official, are quantified, are found to be feasible, and are found to be at least as effective as those measures listed above. The Plan shall identify and quantify any other GHG reduction measures needed to reduce the Project incremental GHG emissions to no net new GHG emissions, or better.

...

Page S-71, Table S-2, line 2 is revised to read:

Mitigation Measure 3.7-1(b)

Annual GHG Verification Report. The project operator shall prepare an Annual GHG Verification Report, which shall be submitted to the City, with a copy provided to CARB, ~~in the first quarter of each year~~ on an annual basis following the commencement of project operations. The Annual GHG Verification Report shall estimate the Project's emissions for the previous year based on operational data and methods, and using appropriate emissions factors for that year, as set forth in the GHG Reduction Plan, and determine whether additional offset credits, or other measures, are needed for the Project to result in net zero GHG emissions. It shall include a process for verifying the actual number and attendance of net new, market-shifted, and backfill events.

...

Page S-80, Table S-2, line 1 is revised to read:

Mitigation Measure 3.11-3(b)

- ii. The construction contractor shall collect vibration data from receptors and report vibration levels to the City Chief Building Official on a monthly basis. The reports shall include annotations regarding project activities as necessary to explain changes in vibration levels, along with proposed corrective actions to avoid vibration levels approaching or exceeding the established threshold.
- c) Post-Construction
 - i. The applicant (and its construction contractor) shall provide a report to the City Chief Building Official regarding crack and vibration monitoring conducted during demolition and construction. In addition to a narrative summary of the monitoring activities and their findings, this report shall include photographs illustrating the post-construction state of cracks and material conditions that were presented in the pre-construction assessment report, along with images of other relevant conditions showing the impact, or lack of impact, of project activities. The photographs shall sufficiently illustrate damage, if any, caused by the project and/or show how the project did not cause physical damage to the buildings. The report shall include annotated analysis of vibration data related to project activities, as well as summarize efforts undertaken to avoid vibration impacts. Finally, a post-construction line and grade survey shall also be included in this report.

Page S-80, Table S-2, line 2 is revised to read:

Mitigation Measure 3.11-3(c)

Designate Community Affairs Liaison. Designate a Community Affairs Liaison and create a telephone hotline and email address to reach this person, with contact information conspicuously posted ~~this person's contact information~~ around the project site, in adjacent public spaces, and in construction notifications. If the Community Affairs Liaison shall be responsible for responding within 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 to any local complaints about construction activities. This ~~The~~ Community Affairs Liaison shall receive all public be responsible for responding to any local complaints about construction vibration 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 investigate, evaluate, and attempt to resolve vibration disturbance complaints related to construction activities of the Project. The Community Affairs Liaison shall have the authority to 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, and shall ensure that steps be taken to reduce construction vibration levels as deemed appropriate and safe by the designated construction contractor representative. Such steps could include the

- Document and respond to each vibration complaint.
- Attempt to contact the person(s) making the vibration complaint as soon as feasible and no later than one construction work day.
- Conduct a prompt investigation to attempt to determine if construction activities contribute a substantial amount of the vibration related to the complaint.
- If it is reasonably determined by the Community Affairs Liaison that construction-related vibration at a vibration-sensitive receptor exceeds 72 VdB at a residence or building where people normally sleep or 75 VdB at a commercial, industrial, or institutional use with primarily daytime use, the Community Affairs Liaison shall identify and implement feasible measures to address the vibration complaint.

Examples of feasible measures that may be implemented include but are not limited to:

- Confirming construction equipment is maintained per manufacturer's specifications;
- Ensuring construction equipment is not operated unnecessarily; and/or
- Evaluating and implementing any feasible measures such as application of vibration absorbing barriers, substitution of lower vibration generating equipment or activity, rescheduling of vibration-generating construction activity, or other potential adjustments to the construction program to reduce vibration impacts at the adjacent vibration-sensitive receptors.

Page S-87 Table S-2, line 3 is revised to read:

Mitigation Measure 3.14-2(a)

- k) Parking Garage/Lot Operations: Through effective garage/lot operations, vehicles do not spill back onto public streets and adversely affect the roadway network prior to events while waiting to enter garages/lots.

The Event TMP shall be subject to review and approval by the City Traffic Engineer. The City Traffic Engineer shall, in performing this review, confirm that the Event TMP meets these standards.

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. Any changes to the Event TMP shall be subject to review and approval by the City Traffic Engineer. In reviewing any proposed changes to the Event TMP, the City Traffic Engineer shall ensure that the Event TMP, as revised, is equally or more effective in addressing the issues set forth above.

Page S-102 Table S-2, line 2 is revised to read:

Mitigation Measure 3.14-28(b)

~~The project applicant shall make a funding contribution to the City of Inglewood Public Works Traffic Division to help fund and implement 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. Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).~~

2.2.2 Chapter 1, Introduction

2.2.2.1 Changes in Response to Comments

There are no text changes in response to comments in this chapter.

2.2.2.2 Staff-Initiated Changes

There are no staff-initiated text changes in this chapter.

2.2.3 Chapter 2, Project Description

2.2.3.1 Changes in Response to Comments

There are no text changes in response to comments in this chapter.

2.2.3.2 Staff-Initiated Changes

Pages 2-88 and 2-89, Subsection 2.6, Actions, add bullet points 7 and 9 and bullet points 4, 6, 8, 10, 11, and 14 are revised to read:

- Approval of amendments to the General Plan's Land Use, and Circulation, and Safety Elements, with conforming map and text changes to reflect the plan for the Proposed Project, including:
 - Redesignation of certain properties in the Land Use Element from Commercial to Industrial;
 - Addition of specific reference to ~~integrated~~ sports and entertainment facilities and related and ancillary uses on properties in the Industrial land use designation text;
 - Updating Circulation Element maps and text to reflect vacation of portions of West 101st Street and West 102nd Street and to show the location of the Proposed Project; and
 - Updating Safety Element map to reflect the relocation of the municipal water well and related infrastructure.
- ...
- Approval of amendments to Chapter 12 ~~and Chapter 5~~ of the Inglewood Municipal Code, including:
 - Text amendments to create an overlay zone establishing development standards including standards for height, setbacks, street frontage, and lot size, permitted uses, signage ~~regulations, noise regulations, parking regulations and loading~~, public art ~~requirements~~, ~~site plan and design review processes under the Proposed Project-specific Development~~

- Guidelines (discussed below), addressing parcel map procedures, and, and other land use controls; and
- Conforming Zoning Map amendments applying the overlay zone to the Project Site or portions thereof.
- Approval of targeted, conforming text amendments to, and waivers or exceptions from, other Inglewood Municipal Code chapters, as necessary, including but not limited to, Chapters 2, 3, 5, 8, 10, and 11, to permit development and operation of the Proposed Project.
- ...
- Approval of right-of-way of permit to encroach on City streets.
- Approval of transfer of certain Successor Agency-owned parcels within the Project Site to the City of Inglewood
- ...
- Approval of a Development Agreement (DA) addressing community benefits; and vesting entitlements for the Proposed Project;
- and establishing IBEC Project-specific Design Guidelines to Approval of Development Guidelines including 1) Implementation and Administration, 2) Design Guidelines, and 3) Infrastructure Plan; the Design Guidelines will address certain design elements, including building orientation, massing, design and materials, plaza treatments, landscaping and lighting design, parking and loading design, pedestrian circulation, signage and graphics, walls, fences and screening, sustainability features, and similar elements.
- Approval of subdivision map(s) or lot line adjustments to consolidate properties and/or adjust property boundaries within the Project Site in compliance with the Subdivision Map Act and Article 22 of the Inglewood Municipal Code (IMC).
- ...
- Any additional actions or permits deemed necessary to implement the Proposed Project, including encroachment, demolition, grading, foundation, and building permits, any permits or approvals required for extended construction hours, tree removal permits, and other additional ministerial actions, permits, or approvals from the City of Inglewood that may be required.

The changes to project actions are being made to reflect and refine the proposed changes to City Code and associated actions that are proposed for the Proposed Project to proceed. These proposed changes will ensure that the Proposed Project, if approved, is consistent with the City’s General Plan and Municipal Code. These changes do not affect the analysis of the Proposed Project’s environmental effects.

2.2.4 Section 3.0, Introduction to the Analysis

2.2.4.1 Changes in Response to Comments

There are no text changes in response to comments in this section.

2.2.4.2 Staff-Initiated Changes

Page 3.0-12, the following text is added after the last full paragraph:

Subsequent to completion of the Cumulative Projects List in May 2018, and after substantial completion of the technical analyses that are reported in the Draft EIR, in June 2019 the City began CEQA review of a proposal to add two digital billboards to locations on West Century Boulevard and South Prairie Avenue, immediately adjacent to the Project Site (the Billboard Project). The public review of the City's Draft Initial Study for the Billboard Project was completed on April 14, 2020. As of May 22, 2020, the Billboard Project has been withdrawn, and the City is no longer considering the project.

This revision is being made to reflect the fact that the Billboard Project proposal is no longer being considered by the City.

2.2.5 Section 3.1, Aesthetics

2.2.5.1 Changes in Response to Comments

There are no text changes in response to comments in this section.

2.2.5.2 Staff-Initiated Changes

Page 3.1-51, Mitigation Measure 3.1-2(a), the third bullet is revised to read:

- *Designate a Community Affairs Liaison and conspicuously post create a telephone hotline and email address to reach this person's number, with contact information conspicuously posted around the 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 disturbances related to construction or security lighting.*

The Community Affairs Liaison shall investigate, evaluate, and attempt to resolve lighting receive all public complaints related to construction activities of the Project 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 complaint and undertaking all feasible measures to protect public health and safety.

- *Document and respond to each lighting complaint.*
- *Attempt to contact the person(s) making the lighting complaint as soon as feasible and no later than one construction work day.*
- *Conduct a prompt investigation to attempt to determine if high-brightness construction-related lighting contributes a substantial amount of light spillover or glare related to the complaint.*

- *If it is reasonably determined by the Community Affairs Liaison that high-brightness construction-related lighting causes substantial spillover light or glare to a light-sensitive receptor, the Community Affairs Liaison shall identify and implement feasible measures to address the lighting complaint.*

Examples of feasible measures that may be implemented include but are not limited to:

- *Confirming construction lighting equipment and related direction and shielding devices are maintained per manufacturer's specifications;*
- *Ensuring construction lighting is not operated unnecessarily; and/or*
- *Evaluating and implementing feasible relocations of lighting equipment, alternatives to specific types of lighting equipment, or changes to direction and shielding equipment, as appropriate.*

This revision is made to provide additional details and clarity about the activities of the Community Affairs Liaison as it relates to addressing complaints about construction lighting impacts, and to create greater consistency between the Community Affairs Liaison provisions of Mitigation Measures 3.1-2(a), 3.11-1, and 3.11-3(c).

2.2.6 Section 3.2, Air Quality

2.2.6.1 Changes in Response to Comments

Page 3.2-30, the following is added after the seventh full paragraph (Rule 1146.2):

- *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.

Page 3.2-30, the following is added after the eighth 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.

Both of the above revisions are being made based on Response to Comment SCAQMD3-6.

Page 3.2-41, the following is added after the first full paragraph:

After preparation of the air quality emissions modeling, on September 27, 2019, the US EPA and the National Highway Traffic Safety Administration (NHTSA) published the Safer Affordable Fuel Efficient (SAFE) Vehicles Rule (84 Fed. Reg. 51,310). The SAFE Part I 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 I 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.

These changes are being made based on Response to Comment NRDC-7.

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.

This revision is being made based on Response to Comment NRDC-9.

2.2.6.2 Staff-Initiated Changes

Page 3.2-88, the first paragraph of Mitigation Measure 3.2-2(c) is revised to read:

The project applicant shall prepare and implement a Construction Emissions Minimization Plan. Before a construction permit is issued Prior to the issuance of a construction permit for each site or phase of the Project, as applicable, the project applicant shall submit the components of this plan associated with the construction activities being approved to the City Department of Economic and Community Development Public Works for review and approval. The plan shall detail compliance with the following requirements:

This revision to the introductory paragraph of Mitigation Measure 3.2-2(c) is intended to clarify the timing, and the responsibility for review and approval, of the required Construction Emissions Minimization Plan.

Page 3.2-88, Mitigation Measure 3.2-2(c)(2) is revised to read:

- 2) *The Plan shall require construction contractor(s) to use off-road diesel-powered construction equipment that meets or exceeds California Air Resources Board (CARB) and US Environmental Protection Agency (EPA) Tier 4 off-road emissions standards, or equivalent, for equipment rated at 50 horsepower or greater. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters. This requirement 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. A copy of each unit's certified tier specification and CARB or South Coast Air Quality Management District operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. The City shall require quarterly reporting and provision of written documentation by contractors to ensure compliance, and shall conduct regular inspections to ensure compliance with these requirements.

The revision to Mitigation Measure 3.2-2(c)(2) is being made to make the measure consistent with Construction Project Design Feature 3.2.1 and match the conclusion disclosed under the Level of Significant After Mitigation discussed on page 3.2-89 of the Draft EIR.

2.2.7 Section 3.3, Biological Resources

2.2.7.1 Changes in Response to Comments

Page 3.3-11, after the last full paragraph, the following text is added:

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 are expected to be incorporated as conditions of approval so that they will be enforceable by the City:

Project Design Feature 3.3-1

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

- The Arena Structure would be designed to achieve Leadership in Energy and Environmental Design (LEED) Bird Collision Deterrence credits;
- The Arena Structure would be designed to 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;
- 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 the goal of achieving a maximum threat factor of 25 pursuant to the American Bird Conservancy Bird Collision Deterrence Material Threat Factor Reference Standard. To be consistent with this standard, the project applicant has committed that a large majority of externally visible glass panels would include a fritted finish,¹⁴ which

is both energy efficient and is perceived by birds as a solid surface, reducing the potential for fatal collisions; and

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

(Footnote 13: Translucent polymer panels will be made of either ethylene tetrafluoroethylene (ETFE) or polytetrafluoroethylene (PTFE).)

(Footnote 14: Fritted glass is glass that has been fused with pigmented glass particles.)

This revision is being made based on Response to Comment PETA-7.

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 Impact 3.3-1, the 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 Chapter 2.0, Figure 2-18, Preliminary Landscaping Plan). 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.)

This revision is being made based on Response to Comment PETA-7.

2.2.7.2 Staff-Initiated Changes

There are no staff-initiated text changes in this section.

2.2.8 Section 3.4, Cultural and Tribal Cultural Resources

2.2.8.1 Changes in Response to Comments

There are no text changes in response to comments in this section.

2.2.8.2 Staff-Initiated Changes

Page 3.4-25, Mitigation Measure 3.4-1, bullet point b) is revised to read:

- b) **Cultural Resources Sensitivity Training.** The qualified archaeologist and Native American Monitor shall conduct construction worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (ia), for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.*

The revision to Mitigation Measure 3.4-1, bullet point b) is being made to correct a typographical error.

2.2.9 Section 3.5, Energy Demand and Conservation

2.2.9.1 Changes in Response to Comments

There are no text changes in response to comments in this section.

2.2.9.2 Staff-Initiated Changes

There are no staff-initiated text changes in this section.

2.2.10 Section 3.6, Geology and Soils

2.2.10.1 Changes in Response to Comments

There are no text changes in response to comments in this section.

2.2.10.2 Staff-Initiated Changes

Page 3.6-28, Mitigation Measure 3.6-2, bullet point a) is revised to read:

- a) *Prepare, design, and implement a monitoring and mitigation ~~program plan~~ for the Project consistent with Society of Vertebrate Paleontology Guidelines. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting. The Plan monitoring and mitigation program shall be prepared and approved by the City prior to the issuance of the first grading permit. If the qualified paleontologist determines that the Project-related grading and excavation activity will not affect Older Quaternary Alluvium, then no further mitigation is required.*

The revision to Mitigation Measure 3.6-2, bullet point a) is being made to provide consistent language in referring to the monitoring and mitigation plan.

2.2.11 Section 3.7, Greenhouse Gas Emissions

2.2.11.1 Changes in Response to Comments

Page 3.7-15, 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

This revision is being made based on Response to Comment LACDPW1-3.

2.2.11.2 Staff-Initiated Changes

Page 3.7-58, Mitigation Measure 3.7-1(a) is revised to read:

Mitigation Measure 3.7-1(a):

GHG Reduction Plan. Prior to the start of construction, the project applicant shall retain a qualified expert to prepare a GHG Reduction Plan (Plan). The City shall approve the expert retained for this purpose to confirm the consultant has the requisite expertise. Components of the Plan relevant to construction GHG emissions associated with the construction activities being approved shall be subject to review and approval by the City Building Official prior to issuance of a construction permit for such activities. Components of the of the Plan relevant to operational GHG emissions, including the annual GHG Verification Report process described below, shall be subject to review and approval by the City Building Official prior to issuance of the Certificate of Occupancy for the Arena.

The purpose of the Plan is to document the Proposed Project's GHG emissions, including emissions after Project-specific GHG reduction measures are implemented, and to determine the net incremental emission reductions required to meet the "no net new" GHG emissions threshold over the 30-year life of the Proposed Project. The Plan shall include a detailed description of the GHG emissions footprint for all operational components of the Proposed Project based on the best available operational and energy use data at time of approval and the latest and most up to date emissions modeling and estimation protocols and methods.

The GHG Reduction Plan shall include the following elements:

1) Project GHG Emissions.

....

Page 3.7-62, Mitigation Measure 3.7-1(a), bullet point (2)(A)(d) is revised to read:

- d. *The TDM Program shall 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 Project's transportation characteristics, and advances in technology or infrastructure become available. Any changes to the TDM Program shall be subject to review and approval by the City Traffic Engineer. In reviewing any proposed changes to the TDM Program, the City Traffic Engineer shall ensure that the TDM Program, as revised, is equally or more effective in addressing the issues set forth above.*

These revisions to Mitigation Measure 3.7-1(a) are being made to mirror the language in Mitigation Measure 3.14-2(b). The revisions are designed to ensure that the way in which the TDM program is described and implemented is consistent.

Page 3.7-64, the first paragraph of Mitigation Measure 3.7-1(b) is revised to read:

Mitigation Measure 3.7-1(b)

Annual GHG Verification Report. The project operator shall prepare an Annual GHG Verification Report, which shall be submitted to the City, with a copy provided to CARB, in the first quarter of each year on an annual basis following the commencement of project operations. The Annual GHG Verification Report shall estimate the Project's emissions for the previous year based on operational data and methods, and using appropriate emissions factors for that year, as set forth in the GHG Reduction Plan, and determine whether additional offset credits, or other measures, are needed for the Project to result in net zero GHG emissions. It shall include a process for verifying the actual number and attendance of net new, market-shifted, and backfill events.

....

The revision to Mitigation Measure 3.7-1(b) is being made to correlate with the reporting cycles of other reports to be submitted to the City. This revision will make it easier for the Project applicant and the City to track and administer the various reports that must be prepared and submitted.

Page 3.7-65, the following text is added immediately before Impact 3.7-2:

Level of Significance After Mitigation: Mitigation Measure 3.7-1(a) requires development of a GHG Reduction Plan to demonstrate how the Proposed Project can achieve “no net new” GHG emissions, either directly or indirectly, over the 30-year operational life of the Proposed Project. The GHG Reduction Plan must incorporate an extensive list of required measures for reducing energy demand and for reducing automobile trips, along with a monitoring program to help ensure effectiveness of the Proposed Project’s TDM program. The GHG Reduction Plan may also include additional on-site and off-site measures as needed to achieve no “net new” emissions over the 30-year operational life of the Proposed Project, including the potential use of carbon offset credits that are verified by an approved registry, defined as “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.”

Mitigation Measure 3.7-1(b) ensures successful implementation of the GHG Reduction Plan by requiring an Annual GHG Verification Report, to be verified by a qualified, independent expert, which shall estimate the Proposed Project’s emissions for the previous year and determine whether additional measures or carbon offset credits are needed for the Proposed Project to maintain its attainment of “no net new” GHG emissions over the course of its 30-year operational life. The Annual GHG Verification Report shall include a process for verifying the actual number and attendance of net new, market-shifted, and backfill events. With the monitoring and reporting program described in Mitigation Measure 3.7-1(b), the City will be actively managing compliance with mitigation, and the GHG Reduction Plan would be effective in reducing project emissions to the “no net new” threshold of significance. Thus, the impact would be **less than significant**.

The addition of the Level of Significance After Mitigation language in Draft EIR, Section 3.7, Greenhouse Gas Emissions has been added to the end of Mitigation Measure 3.7-1 to describe the efficacy of the mitigation, and provide a conclusion to the impact assessment. As shown on page 3.7-71 of the Draft EIR, the impact is, and remains, less than significant.

2.2.12 Section 3.8, Hazards and Hazardous Materials

2.2.12.1 Changes in Response to Comments

Pages 3.8-43 and 3.8-44, Mitigation Measure 3.8-4 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 ~~HHMD~~ the 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 from the appropriate regulatory agency for a course of action that would allow that construction can recommence to recommence within any such areas. The project applicant shall submit the “no further action” letter or ~~equivalent~~ notification documenting direction from the regulatory agency to the City prior to resumption of any ground disturbing activity on the relevant portion of the Project Site. If compounds in soil are identified in concentrations that trigger SCAQMD’s Rules 1166 or 1466, the SMP will require compliance with such rules.

This revision is being made based on Response to Comment SCAQMD-6.

2.2.12.2 Staff-Initiated Changes

There are no staff-initiated text changes in this section.

2.2.13 Section 3.9, Hydrology and Water Quality

2.2.13.1 Changes in Response to Comments

Page 3.9-8, the first sentence of the third full paragraph 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,³¹ indicating that there is a 0.2 percent chance of occurring in any given year.

Pages 3.9-13 and 3.9-14, first sentence of the paragraph under Code of Federal Regulations headings 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.

Both of these revisions are being made based on Response to Comment LACDPW1-4.

2.2.13.2 Staff-Initiated Changes

There are no staff-initiated text changes in this section.

2.2.14 Section 3.10, Land Use and Planning

2.2.14.1 Changes in Response to Comments

There are no text changes in response to comments in this section.

2.2.14.2 Staff-Initiated Changes

There are no staff-initiated text changes in this section.

2.2.15 Section 3.11, Noise and Vibration

2.2.15.1 Changes in Response to Comments

Page 3.11-103, Mitigation Measure 3.11-1 the eighth bullet point is revised as follows:

- *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.

This revision is being made based on Response to Comment Gerson-4.

Page 3.11-158, 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. 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 with sound 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.

- 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.
 - 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.~~

This revision is being made based on Responses to Comments Gerson-4 and Channel-22.

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.~~ 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.

This revision is being made based on Response to Comment Channel-22.

2.2.15.2 Staff-Initiated Changes

Draft EIR, page 3.11-183 to -184, Mitigation Measure 3.11-3(b) bullet points (b)(ii) and (c)(1) are revised to read:

...

- ii. *The construction contractor shall collect vibration data from receptors and report vibration levels to the City Chief Building Official on a monthly basis. The reports shall include annotations regarding project activities as necessary to explain changes in vibration levels, along with proposed corrective actions to avoid vibration levels approaching or exceeding the established threshold.*

c) *Post-Construction*

- i. *The applicant (and its construction contractor) shall provide a report to the City Chief Building Official regarding crack and vibration monitoring conducted during demolition and construction. In addition to a narrative summary of the monitoring activities and their findings, this report shall include photographs illustrating the post-construction state of cracks and material conditions that were presented in the pre-construction assessment report, along with images of other relevant conditions showing the impact, or lack of impact, of project activities. The photographs shall sufficiently illustrate damage, if any, caused by the project and/or show how the project did not cause physical damage to the buildings. The report shall include annotated analysis of vibration data related to project activities, as well as summarize efforts undertaken to avoid vibration impacts. Finally, a post-construction line and grade survey shall also be included in this report.*

...

This revision is made to correct the title of the City Building Official.

Draft EIR, page 3.11-185, Mitigation Measure 3.11-3(c) is revised to read:

Designate Community Affairs Liaison. Designate a Community Affairs Liaison and create a telephone hotline and email address to reach this person, with contact information conspicuously posted this person's contact information around the project site, in adjacent public spaces, and in construction notifications. ~~If the Community Affairs Liaison shall be responsible for responding within 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 to any local complaints about construction activities. This~~ The Community Affairs Liaison shall receive all ~~public~~ be responsible for responding to any local complaints about construction vibration 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 investigate, evaluate, and attempt to resolve vibration disturbance complaints related to construction activities of the Project. The Community Affairs Liaison shall ~~have the authority to~~ 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, and shall ensure that steps be taken to reduce construction vibration levels as deemed appropriate and safe by the designated construction contractor representative. Such steps could include the

- *Document and respond to each vibration complaint.*
- *Attempt to contact the person(s) making the vibration complaint as soon as feasible and no later than one construction work day.*
- *Conduct a prompt investigation to attempt to determine if construction activities contribute a substantial amount of the vibration related to the complaint.*
- *If it is reasonably determined by the Community Affairs Liaison that construction-related vibration at a vibration-sensitive receptor exceeds 72 VdB at a residence or building where people normally sleep or 75 VdB at a commercial, industrial, or institutional use with primarily daytime use, the Community Affairs Liaison shall identify and implement feasible measures to address the vibration complaint.*

Examples of feasible measures that may be implemented include but are not limited to:

- *Confirming construction equipment is maintained per manufacturer's specifications;*
- *Ensuring construction equipment is not operated unnecessarily; and/or*
- *Evaluating and implementing any feasible measures such as application of vibration absorbing barriers, substitution of lower vibration generating equipment or activity, rescheduling of vibration-generating construction activity, or other potential adjustments to the construction program to reduce vibration impacts at the adjacent vibration-sensitive receptors.*

This revision is made to provide additional details and clarity about the activities of the Community Affairs Liaison as it relates to addressing complaints about construction vibration impacts, and to create greater consistency between the Community Affairs Liaison provisions of Mitigation Measures 3.1-2(a), 3.11-1, and 3.11-3(c).

2.2.16 Section 3.12, Population, Employment, and Housing

2.2.16.1 Changes in Response to Comments

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**.

This revision is being made based on Response to Comment Sambrano-13.

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.

This revision is being made based on Response to Comment Sambrano-13.

2.2.16.2 Staff-Initiated Changes

Table 3.12-3 on page 3.12-5 of the Draft EIR provides employment trends for the City of Inglewood and the Southern California Association of Governments (SCAG) region. Data for employment in the City of Inglewood is based on data provided by the 2006-2010 American Community Survey, for 2010 data; 2009-2013 American Community Survey (5-year estimate) data for the year 2013; and U.S. Census data for the year 2017.

Since publication of the Draft EIR, the City consulted with the U.S. Census Bureau, which provided clarification that U.S. Census and American Community Survey employment data is represented as total employed residents of a geographic area (in this case, residents of the City of Inglewood who are employed in any location), and does not represent the number of jobs that exist within that geographic area.¹ In order to identify more appropriate City employment

¹ Howard, David J., 2020. U.S. Census Bureau, Labor Force Group. Telephone conversation with Jonathan Teofilo. April 30, 2020.

estimates, the City reviewed the 2016 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS), which includes SCAG-prepared 10-year estimates for the number of jobs within each City in the SCAG region. SCAG employment estimates for the City of Inglewood from 2007 to 2017 are included in the SCAG Profile of the City of Inglewood, and represent the most accurate estimate of the number of jobs existing in the City of Inglewood during the years 2010, 2013, and 2017.² In order to reflect this improved source of past employment data, several revisions to Section 3.12, Population, Housing, and Employment, of the Draft EIR, are required to correct past year employment statistics for Inglewood, which in turn affect the estimates of future City-wide employment under Adjusted Baseline and Cumulative scenarios, with and without the Proposed Project. The estimate of employment generated by the Proposed Project remains unchanged from that presented in the Draft EIR, and as a result the conclusions that the employment impacts of the Proposed Project are less than significant remain unchanged, as do the analyses and conclusions from Chapter 3 of the Draft EIR. The corrections to past year employment estimates for the City of Inglewood are presented below.

Page 3.12-3, last full paragraph, the first sentence is revised to read:

According to the U.S. Census, in 2017, there were approximately 51,474 employees employed residents in the City, which were employed within the City and in other areas of the region.⁸

(Footnote 8: U.S. Census, 2017. *2013–2017 American Community Survey (5-year estimates).*)

Page 3.12-3, the last paragraph is revised to read:

According to SCAG in 2017 there were approximately 34,962 jobs in the City of Inglewood, which included employed residents of the City of Inglewood and residents of other areas within the region (see Table 3.12-3) shows existing and forecasted employment in the City and region. Similar to the changes related to the City's households and population, the City's employment decreased ~~in the late 2000s between 2010 and 2013~~ due to the nation-wide economic downturn. As Table 3.12-3 shows, the employment forecast for the City for 2040, a total of 37,400 jobs, is significantly lower projected to be approximately 7 percent higher than existing employment jobs in the City as of 2017, but lower than the Adjusted Baseline employment, which reflects considerable development in the HPSP area. ~~The reason is that SCAG's employment forecast for the City was prepared in 2012, at a time when employment levels were depressed during the downturn in the economy. Since that date, City employment has recovered at a rate that exceeds SCAG's forecast. From 2013 to 2017, the City has increased jobs by an estimated 2.13~~ 2.18 percent per year. Similar to the City, regional employment decreased in the late 2000s due to the economic downturn, and has increased in the years since then. According to SCAG's RTP/SCS, regional employment is

² Southern California Association of Governments, 2019. Profile of the City of Inglewood. May 2019.

expected to increase over time to an estimated 9,872,000 jobs by 2040, equating to an average annual growth of about 0.59 percent per year from 2017.

Page 3.12-5, Table 3.12-3, is revised to read:

**TABLE 3.12-3
TRENDS IN EMPLOYMENT GROWTH IN THE INGLEWOOD AND SCAG REGION**

Year	Inglewood			SCAG Region		
	Employment Jobs	Employment Growth From Prior Year Listed	Average Annual Percent Growth ^a	Employment Jobs	Employment Growth From Prior Year Listed	Average Annual Percent Growth
2000	42,375	—	—	6,948,811	—	—
2010	49,000 32,241	6,625	1.56%	8,096,617	1,147,806	1.65%
2013	47,436 32,152	-1,564 -89	-4.06 -0.09 %	8,070,271	-26,346	-0.11%
2017	51,474 34,962	4,038 2,810	2.43 2.18 %	8,685,134	614,863	1.90%
2040	37,400 ^b	-14,074 2,438	-1.19 0.30 %	9,872,000 ^c	1,186,866	0.59%

NOTES:

- ^a "Average Annual Percent Growth" considers the growth in population value, and divides it by the number of years this growth represents in order to present a comparable annual change; i.e., 1990–2000 = 10 years, 2010–2017 = 7 years, and 2017–2040 = 23 years.
- ^b 2040 data for the City of Inglewood is sourced from 2016 RTP/SCS Growth Forecast by Jurisdiction, p. 1.
- ^c 2040 data for the SCAG region is sourced from SCAG, 2016. *Regional Transportation Plan Sustainable Communities Strategy 2016–2040*. p. 51.

SOURCES:

2000 data is provided by U.S. Census, 2000, DP-3-Population Group-Total population: Profile of Selected Economic Characteristics: 2000, Census 2000 Summary File 4 (SF 4) – Sample Data. Available: <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>; 2010, 2013, and 2017 data for the City of Inglewood provided by the SCAG Profile of the City of Inglewood, SCAG, 2019. Profile of the City of Inglewood, May 2019. Page 24. 2006–2010 American Community Survey Selected Population Tables; 2013 data provided by 2009–2013 American Community Survey (5-year estimates); 2017 data is provided by U.S. Census, 2017; 2016 RTP/SCS Growth Forecast by Jurisdiction. Available: <http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf>; and SCAG, 2016. *Regional Transportation Plan Sustainable Communities Strategy 2016–2040*.

Page 3.12-6, last full paragraph, the last sentence is revised to read:

Overall, as shown in **Table 3.12-6**, under Adjusted Baseline conditions, the City has a residential population of 113,491 ~~504~~ persons, employment of 60,944 ~~44,432~~ jobs, and a housing stock of 39,005 units.

Page 3.12-7, Table 3.12-6, is revised to read:

**TABLE 3.12-6
HPSP ADJUSTED BASELINE CONDITIONS**

Use	Existing Setting ^a	HPSP Adjusted Baseline Projects	Total
Population	112,549	955	113,504
Housing	38,691	314	39,005
Employment	51,474 <u>34,962</u>	9,470	60,944 <u>44,432</u>

NOTE:

^a Population and Housing are incorporated from Table 43.12-1 and Table 43.12-2, and Employment uses data from Table 43.12-3.

SOURCE: ESA, 2019

Page 3.12-11, last full paragraph, the last sentence is revised to read:

Sources of information for population-, employment-, and housing-related estimates include the City of Inglewood General Plan and Housing Element, U.S. Census American Fact Finder, the California Department of Finance, SCAG RTP/SCS,¹⁶ SCAG Profile of the City of Inglewood, and the RHNA.

(Footnote 16: Note that, because the SCAG RTP/SCS is a regional tool to plan for possible future growth, it does not represent a growth ceiling, or limit.)

Page 3.12-13, the last paragraph, is revised to read:

When accounting for the removal of existing uses, the Proposed Project would result in an increase of approximately 968 jobs within the City. The Proposed Project net new employment would increase employment in the City from 60,944 44,432 under the Adjusted Baseline to approximately 62,91245,400 with the Proposed Project.¹⁹

(Footnote 19: The employment increase is based on the Adjusted Baseline Environmental Setting of 9,470 more jobs (see Table 3.12-5) plus the existing setting of 51,474 34,962 jobs, for a total of 60,944 44,432 jobs (see Table 3.12-6). The Adjusted Baseline employment includes approximately 6,000 jobs associated with the operation of the NFL Stadium. It is assumed that the vast majority of these jobs are event-related employment estimated for the purposes of transportation analysis. Although details are not available to the City, an assessment of full time equivalent employment at the Stadium would be materially less than the total of 6,000.)

Page 3.12-14, first paragraph, the first paragraph is revised to read:

~~As is discussed above under Environmental Setting, in 2017 total employment in the City of Inglewood exceeded that projected by SCAG RTP/SCS for 2020, as well as employment projections through 2040,²⁰ due in large part to the SCAG projection taking place during the economic downturn of the Great Recession. Thus, the The 968 net new jobs added as a result of the Proposed Project would represent approximately 40 percent of the job employment growth beyond that forecast by SCAG for the City between 2017 and 2040.²¹ Nevertheless, ~~t~~The evaluation of physical environmental effects presented in this Draft EIR is based on existing conditions adjusted by actual projects that have been~~

proposed in the vicinity, considered in light of baseline service and infrastructure capacity, as described throughout sections of Chapter 3 of this Draft EIR (in particular, see discussions of impacts in Sections 3.13, Public Services; 3.14, Transportation and Circulation; and 3.15, Utilities and Service Systems; and related Sections 3.2, Air Quality; 3.5, Energy Demand and Conservation; 3.7, Greenhouse Gas Emissions; and 3.11, Noise and Vibration). Therefore, the increase in employment in the City as a result of the Proposed Project over past projections would not result in any significant physical environmental impacts not otherwise disclosed in this Draft EIR.

(Footnote 20: 2016 RTP/SCS Growth Forecast by Jurisdiction, p. 1. See also, Table 3.12-3.)

(Footnote 21: ~~Although not an environmental issue, the unemployment rate in the City suggests that the new jobs can be accommodated by existing workers in the City and region.~~)

Based on the text revisions identified above the estimate of employment growth as a result of the proposed project would be increased. Thus, page 3.12-19, first partial paragraph, last sentence is revised to read:

Added to existing 2017 ~~employment~~ conditions of ~~51,474~~34,962 jobs, the City would have an estimated employment of 76,902 ~~60,390~~ jobs under cumulative conditions.

The revisions shown above correct a misinterpretation of historical employment statistics for the City of Inglewood. The employment data presented in section 3.12 is independent from any data contained in analytical models used to estimate future traffic conditions, air pollutant emissions, noise levels, or public services or utilities demands presented in the Draft EIR. As such, the corrections to section 3.12, shown above, do not change the less-than-significant employment impact conclusions presented in the Draft EIR, nor do they affect any of the analyses or conclusions from Chapter 3 of the Draft EIR.

2.2.17 Section 3.13, Public Services

2.2.17.1 Changes in Response to Comments

Page 3.13-26, second full 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.

This revision is being made based on Response to Comment LACFD-2.

2.2.17.2 Staff-Initiated Changes

In Section 3.13, Public Services, an incorrect acronym was used to refer to the Los Angeles County Fire Department. Throughout the section, the term “LAFCD” is revised to read “LACFD.”

The changes to Section 3.13, Public Services, are being made to correct a typographical error.

2.2.18 Section 3.14, Transportation and Circulation

2.2.18.1 Changes in Response to Comments

The jurisdiction shown for Intersection #50, Century Boulevard/Van Ness Avenue, 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 as follows: Inglewood/Los Angeles County. This revision is being made based on Response to Comment LADOT-15.

The jurisdiction shown for Intersection #66, Lennox Boulevard/Freeman Avenue, 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 as follows: Inglewood/Los Angeles County. This revision is being made based on Response to Comment LACDPW1-5.

The jurisdiction shown for Intersection #74, Hawthorne Boulevard/Westbound I-105 Off-Ramp, in Tables 3.14-8, 3.14-22B, 3.14-31, 3.14-48B, 3.14-52, 3.14-59, 3.14-60, 3.14-62, 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 is revised as follows: Hawthorne/Los Angeles County. This revision is being made based on Response to Comment LACDPW1-5.

The Draft EIR inconsistently shows the results of the impact analysis for the intersection of Manchester Avenue & Western Avenue (Intersection #98). The results for this intersection were inadvertently omitted from Table 3.14-59. This revision is being made based on Response to Comment LADOT-16.

The Draft EIR analysis of the intersection of Intersection #50, 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. Detailed level of service worksheets will be included in the Final EIR. 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 will be modified and included in the Final EIR. This revision is being made based on Response to Comment LADOT-15.

Each of these changes described above are shown in the edited tables below, in order of appearance in the tables.

Page 3.14-21, Table 3.14-7, line 25 is revised to read:

**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/ <u>Los Angeles County</u>	AM	0.700	B
				PM	0.0757 <u>0.783</u>	C
		CMA	City of Los Angeles	AM	0.640	B
				PM	0.701 <u>0.728</u>	C

Page 3.14-27, Table 3.14-8, line 50 is revised to read:

**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

Pages 3.14-72 and 3.14-73, Table 3.14-15, lines 25 and 35, are revised to read:

**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	0.802 0.828	D	0.808 0.832	D
		CMA	City of Los Angeles	AM	0.670	B	0.677	B
				PM	0.749 0.776	C	0.755 0.780	C
66	Freeman Ave/ Lennox Blvd	ICU	Inglewood/Los Angeles County	AM	0.523	A	0.523	A
				PM	0.434	A	0.435	A

Pages 3.14-82 and 3.14-83, Table 3.14-22A, lines 25 and 35 are revised to read:

**TABLE 3.14-22A
WEEKDAY AM 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	AM	0.728	C	0.740	C
				AM	0.670	B	0.683	B
66	Freeman Ave/ Lennox Blvd	ICU	Inglewood/Los Angeles County	AM	0.523	A	0.523	A

Pages 3.14-86 and 3.14-87, Table 3.14-22B, lines 50, 66 and 74 are revised to read:

**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	0.802 <u>0.828</u>	D	0.844 <u>0.868</u>	D
	CMA	City of Los Angeles	PM	0.749 <u>0.776</u>	C	0.794 <u>0.819</u>	D
66 Freeman Ave/ Lennox Blvd	ICU	Inglewood/Los Angeles County	PM	0.434	A	0.455	A
74 Hawthorne Blvd/ WB 105 Off-Ramp	ICU	Hawthorne/Los Angeles County	PM	0.745	C	0.851	D
	HCM	Caltrans	PM	22.0	C	34.2	C

Pages 3.14-114 and 3.14-116, Table 3.14-31, lines 50 and 74 are revised to read:

**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	0.404 <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	0.324 <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
74	Hawthorne Blvd/ WB 105 Off- Ramp	ICU	Hawthorne/ Los Angeles County	Weekday Pre-Event	0.690	B	0.804	D
				Weekday Post-Event	0.438	A	0.610	B
				Weekend Pre-Event	0.577	A	0.694	B
		HCM	Caltrans	Weekday Pre-Event	20.3	C	25.0	C
				Weekday Post-Event	14.6	B	17.7	B
		Weekend Pre-Event	17.4	B	20.1	C		

Pages 3.14-146 and 3.14-147, Table 3.14-44, lines 25 and 35 are revised to read:

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/ <u>Los Angeles County</u>	AM	0.873	D	0.885	D
			PM	0.894 <u>0.933</u>	D <u>E</u>	0.900 <u>0.937</u>	D <u>E</u>
	CMA	City of Los Angeles	AM	0.725	C	0.737	C
			PM	0.745 <u>0.788</u>	C	0.751 <u>0.792</u>	C
66 Freeman Ave/ Lennox Blvd	ICU	Inglewood <u>Los Angeles County</u>	AM	0.536	A	0.536	A
			PM	0.443	A	0.444	A

Pages 3.14-154 and 3.14-155, Table 3.14-48A, lines 25 and 35 are revised to read:

TABLE 3.14-48A
WEEKDAY AM PEAK HOUR INTERSECTION OPERATIONS – CUMULATIVE PLUS PROJECT (DAYTIME EVENTS) 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/ <u>Los Angeles County</u>	AM	0.873	D	0.899	D
	CMA	City of Los Angeles	AM	0.725	C	0.753	C
66 Freeman Ave/ Lennox Blvd	ICU	Inglewood/ <u>Los Angeles County</u>	AM	0.536	A	0.536	A

Pages 3.14-158 and 3.14-159, Table 3.14-48B, lines 50, 66, and 74 are revised to read:

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	0.894 <u>0.933</u>	D E	0.936 <u>0.973</u>	E
		CMA	City of Los Angeles	PM	0.745 <u>0.788</u>	C	0.791 <u>0.831</u>	D
66	Freeman Ave/Lennox Blvd	ICU	Inglewood/Los Angeles County	PM	0.443	A	0.465	A
74	Hawthorne Blvd/WB 105 Off-Ramp	ICU	Hawthorne/Los Angeles County	PM	0.797	C	0.902	E
		HCM	Caltrans	PM	26.6	C	57.0	E

Pages 3.14-172 and 3.14-174, Draft EIR, Table 3.14-52, lines 50 and 74 are revised to read:

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	Cumulative No Project		Cumulative Plus Project	
					V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/West Century Blvd	ICU	Inglewood/Los Angeles County	Weekday Pre-Event	0.841	D	0.878	D
				Weekday Post-Event	0.436 <u>0.478</u>	A	0.677 <u>0.694</u>	B
				Weekend Pre-Event	0.743 <u>0.772</u>	C	0.823 <u>0.832</u>	D
		CMA	City of Los Angeles	Weekday Pre-Event	0.691	B	0.730	C
				Weekday Post-Event	0.257 <u>0.303</u>	A	0.515 <u>0.533</u>	A
				Weekend Pre-Event	0.587 <u>0.617</u>	A B	0.671 <u>0.682</u>	B
74	Hawthorne Blvd/WB 105 Off-Ramp	ICU	Hawthorne/Los Angeles County	Weekday Pre-Event	0.739	C	0.847	D
				Weekday Post-Event	0.464	A	0.637	B
				Weekend Pre-Event	0.628	B	0.738	C
		HCM	Caltrans	Weekday Pre-Event	22.8	C	26.6	C
				Weekday Post-Event	15.3	B	18.4	B
				Weekend Pre-Event	19.1	B	23.8	C

Pages 3.14-208, 3.14-209, and 3.14-210, Table 3.14-59, line 44 is added and lines 19 and 32 are revised to read:

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	0.802 <u>0.828</u>	D	0.844 <u>0.868</u>	D		
		CMA	City of Los Angeles	AM	0.670	B	0.683	B		
				PM	0.749 <u>0.776</u>	C	0.794 <u>0.819</u>	C <u>D</u>		
74	Hawthorne Blvd/WB 105 Off-Ramp	ICU	<u>Hawthorne/ Los Angeles County</u>	PM	0.745	C	0.851	D		
		HCM	Caltrans	PM	22.0	C	34.2	C		
<u>98</u>	<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>		

This revision is being made based on Response to Comment LADOT-16.

Pages 3.14-226 and 3.14-229, Table 3.14-60, lines 50 and 74 are revised to read:

**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	0.324 <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		
74	Hawthorne Blvd/WB 105 Off-Ramp	ICU	Hawthorne/ Los Angeles County	Weekday Pre-Event	0.690	B	0.804	D		
				Weekday Post-Event	0.438	A	0.610	B		
				Weekend Pre-Event	0.577	A	0.694	B		
		HCM	Caltrans	Weekday Pre-Event	20.3	C	25.0	C		
				Weekday Post-Event	14.6	B	17.7	B		
				Weekend Pre-Event	17.4	B	20.1	C		

Pages 3.14-262 and 3.14-263, Table 3.14-62, lines 25 and 39 are revised to read:

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>	<u>D</u> <u>E</u>	<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>	<u>C</u> <u>D</u>		
74	Hawthorne Blvd/WB 105 Off-Ramp	ICU	<u>Hawthorne/Los Angeles County</u>	PM	0.797	C	0.902	E		
		HCM	Caltrans	PM	26.6	C	57.0	E		

Pages 3.14-278 and 3.14-281, Table 3.14-63, lines 50 and 74 are revised to read:

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

#	Intersection	Methodology ^{1,2}	Jurisdiction ¹	Peak Hour	Cumulative No Project		Cumulative Plus Project		Cumulative Plus Project With Mitigation	
					V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS
50	Van Ness Ave/ West Century Blvd	ICU	Inglewood/ Los Angeles County	Weekday Pre-Event	0.841	D	0.878	D		
				Weekday Post-Event	0.436 <u>0.478</u>	A	0.677 <u>0.694</u>	B		
				Weekend Pre-Event	0.743 <u>0.772</u>	C	0.823 <u>0.832</u>	D		
		CMA	City of Los Angeles	Weekday Pre-Event	0.691	B	0.730	C		
				Weekday Post-Event	0.257 <u>0.303</u>	A	0.515 <u>0.533</u>	A		
				Weekend Pre-Event	0.587 <u>0.617</u>	A B	0.671 <u>0.682</u>	B		
74	Hawthorne Blvd/ WB 105 Off Ramp	ICU	Hawthorne/ <u>Los Angeles County</u>	Weekday Pre-Event	0.739	C	0.847	D		
				Weekday Post-Event	0.464	A	0.637	B		
				Weekend Pre-Event	0.628	B	0.738	C		
		HCM	Caltrans	Weekday Pre-Event	22.8	C	26.6	C	0.8	D
				Weekday Post-Event	15.3	B	18.4	B	0.6	B
				Weekend Pre-Event	19.1	B	23.8	C	0.7	C

Pages 3.14-306 and 3.14-308, Table 3.14-64, lines 50 and 74 are revised to read:

**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
74	Hawthorne Blvd/ WB 105 Off Ramp	ICU	Hawthorne/ Los Angeles County	Weekday Pre-Event	0.700	B	0.817	D
				Weekday Post-Event	0.461	A	0.634	B
				Weekend Pre-Event	0.582	A	0.702	C
		HCM	Caltrans	Weekday Pre-Event	21.0	C	25.2	C
				Weekday Post-Event	15.0	B	17.9	B
				Weekend Pre-Event	17.6	B	22.4	C

Pages 3.14-323 and 3.14-324, Table 3.14-67, lines 50 and 74 are revised to read:

**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
74	Hawthorne Blvd/ WB 105 Off-Ramp	ICU	Hawthorne/ Los Angeles County	Weekend Pre-Event	0.584	A	0.632	B
		HCM	Caltrans	Weekend Pre-Event	17.5	B	20.3	C

Pages 3.14-337 and 3.14-339, Table 3.14-70, lines 50 and 74 is revised to read:

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	<u>0.536</u> <u>0.579</u>	A	<u>0.702</u> <u>0.720</u>	C
		CMA	City of Los Angeles	Weekday Pre-Event	0.720	C	0.795	C
				Weekday Post-Event	<u>0.465</u> <u>0.510</u>	A	<u>0.643</u> <u>0.661</u>	B
74	Hawthorne Blvd/ WB 105 Off-Ramp	ICU	<u>Hawthorne/Los Angeles County</u>	Weekday Pre-Event	0.711	C	0.845	D
				Weekday Post-Event	0.483	A	0.663	B
		HCM	Caltrans	Weekday Pre-Event	22.5	C	26.1	C
				Weekday Post-Event	15.5	B	19.0	B

Pages 3.14-351 and 3.14-353, Table 3.14-73, lines 50 and 74 are revised to read:

**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 <u>B</u>	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 <u>C</u>
74	Hawthorne Blvd/ WB 105 Off-Ramp	ICU	Hawthorne/ Los Angeles County	Weekday Pre-Event	0.889	D	1.053	F
				Weekday Post-Event	0.725	C	0.905	E
		HCM	Caltrans	Weekday Pre-Event	27.9	C	62.2	E
				Weekday Post-Event	19.5	B	57.4	E

Pages 3.14-365 and 3.14-366, Table 3.14-76, lines 50 and 74 are revised to read:

**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
74	Hawthorne Blvd/ WB 105 Off-Ramp	ICU	Hawthorne/Los Angeles County	Weekend Pre-Event	0.592	A	0.643	B
		HCM	Caltrans	Weekend Pre-Event	17.9	B	20.8	C

Pages 3.14-381 and 3.14-383, Table 3.14-81, lines 50 and 74 is revised to read:

**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 C
				Weekend Pre-Event	0.589 <u>0.620</u>	A B	0.719 <u>0.730</u>	C
74	Hawthorne Blvd/ WB 105 Off- Ramp	ICU	Hawthorne/ Los Angeles County	Weekday Pre-Event	0.748	C	0.860	D
				Weekday Post-Event	0.488	A	0.661	B
				Weekend Pre-Event	0.634	B	0.745	C
		HCM	Caltrans	Weekday Pre-Event	23.7	C	26.9	C
				Weekday Post-Event	15.6	B	18.6	B
				Weekend Pre-Event	19.3	B	23.9	C

Pages 3.14-397 and 3.14-399, Table 3.14-84, lines 50 and 74 are revised to read:

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
74	Hawthorne Blvd/ WB 105 Off-Ramp	ICU	Hawthorne/ <u>Los Angeles</u> County	Weekend Pre-Event	0.636	B	0.675	B
		HCM	Caltrans	Weekend Pre-Event	19.1	B	22.7	C

Pages 3.14-410 and 3.14-477, Table 3.14-87, lines 50 and 74 are revised to read:

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
74	Hawthorne Blvd/WB 105 Off-Ramp	ICU	Hawthorne/ <u>Los Angeles</u> County	Weekday Pre-Event	0.761	C	0.887	D
				Weekday Post-Event	0.509	A	0.707	C
		HCM	Caltrans	Weekday Pre-Event	24.3	C	28.1	C
				Weekday Post-Event	16.4	B	20.1	C

Pages 3.14-423 and 3.14-425, Table 3.14-90, lines 50 and 74 are revised to read:

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
74	Hawthorne Blvd/ WB 105 Off-Ramp	ICU	Hawthorne/ Los Angeles County	Weekday Pre-Event	0.931	E	1.096	F
				Weekday Post-Event	0.751	C	0.949	E
		HCM	Caltrans	Weekday Pre-Event	31.4	C	68.2	E
				Weekday Post-Event	20.8	C	74.2	E

Pages 3.14-437 and 3.14-438, Table 3.14-93, lines 50 and 74 are revised to read:

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	0.828	D
74	Hawthorne Blvd/ WB 105 Off-Ramp	ICU	Hawthorne/ Los Angeles County	Weekend Pre-Event	0.645	B	0.686	B
		HCM	Caltrans	Weekend Pre-Event	19.5	B	22.9	C

Pages 3.14-468 and 3.14-471, Table 3.14-98, lines 50 and 74 are revised to read:

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		
74	Hawthorne Blvd/ WB 105 Off Ramp	ICU	Hawthorne/ <u>Los Angeles</u> <u>County</u>	Weekday Pre-Event	0.700	B	0.817	D		
				Weekday Post-Event	0.461	A	0.634	B		
				Weekend Pre-Event	0.582	A	0.702	C		
		HCM	Caltrans	Weekday Pre-Event	21.0	C	25.2	C		
				Weekday Post-Event	15.0	B	17.9	B		
				Weekend Pre-Event	17.6	B	22.4	C		

Pages 3.14-501 and 3.14-504, Table 3.14-99, lines 50 and 74 are revised to read:

**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 0.645	B	0.844 0.861	D		
				Weekend Pre-Event	0.745 0.774	C	0.869 0.878	D		
		CMA	City of Los Angeles	Weekday Pre-Event	0.695	B	0.813	D		
				Weekday Post-Event	0.435 0.481	A	0.693 0.711	C		
				Weekend Pre-Event	0.589 0.620	A B	0.719 0.730	C		
74	Hawthorne Blvd/ WB 105 Off Ramp	ICU	Hawthorne/Los Angeles County	Weekday Pre-Event	0.748	C	0.860	D		
				Weekday Post-Event	0.488	A	0.661	B		
				Weekend Pre-Event	0.634	B	0.745	C		
		HCM	Caltrans	Weekday Pre-Event	23.7	C	26.9	C	0.9	D
				Weekday Post-Event	15.6	B	18.6	B	0.7	B
				Weekend Pre-Event	19.3	B	23.9	C	0.7	C

Page 3.14-47, the 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.

This revision is being made based on Response to Comment Metro-6.

Page 3.14-53, last partial 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/>.)

This revision is being made based on Response to Comment Metro-7.

Page 3.14-198, last paragraph on the page, the second to last paragraph of Mitigation Measure 3.14-2(b), 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.

This revision is being made based on Response to Comment LADOT-8.

Page 3.14-200, Mitigation Measure 3.14-2(o) is revised to read:

Mitigation Measure 3.14-2(o)

The project applicant shall make a funding contribution of \$12 million to the City of Inglewood Public Works Traffic Division to help fund and implement Intelligent Transportation Systems (ITS) improvements, including related enabling infrastructure, licensing software, control center and technology updates, related corridor enhancements and supporting ITS components, 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. 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.

The revision to Mitigation Measure 3.14-2(o) is being made to identify the specific amount of the project applicant’s contribution to the City’s ITS. This amount is based on consultations that have occurred between the City and the project applicant during the development of an infrastructure plan. The measure is also being revised to clarify that ITS improvements may include related

infrastructure that is required in order to upgrade and operate the ITS at affected intersections and corridors.

Page 3.14-199, 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.

This revision is being made based on Response to Comment LADOT-6.

Page 3.14-200, this mitigation measure is added following Mitigation Measure 3.14-2(o):

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.

This revision is being made based on Response to Comment Caltrans-9.

Page 3.14-204, the following is added after the first full paragraph:

*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**.*

Page 3.14-216, 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.

This revision is being made based on Response to Comment LADOT-7.

Page 3.14-253, the following is added 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.

This revision is being made based on Response to Comment Metro-14.

Page 3.14-270, 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*

This revision is being made based on Response to Comment LADOT-10.

Page 3.14-294, the following mitigation measure is added following Mitigation Measure 3.14-24(g):

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.

This revision is being made based on Response to Comment Caltrans-5.

Page 3.14-295, as an explanation of the Level of Significance After Mitigation, the last sentence in the second paragraph 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.

This revision is being made based on Response to Comment Caltrans-5.

2.2.18.2 Staff-Initiated Changes

Page 3.14-195, the last paragraph of Mitigation Measure 3.14-2(a) is revised to read:

The Event TMP ~~would~~ will be a dynamic document that ~~would~~ 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. Any changes to the Event TMP shall be subject to review and approval by the City Traffic Engineer. In reviewing any proposed changes to the Event TMP, the City Traffic Engineer shall ensure that the Event TMP, as revised, is equally or more effective in addressing the issues set forth above.

The revisions to Mitigation Measure 3.14-2(a) are being made to make minor typographical and grammar corrections.

Page 3.14-198, last paragraph on the page, the last paragraph of Mitigation Measure 3.14-2(b) is revised to read:

The TDM Program ~~shall~~ 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 Project’s transportation characteristics, and advances in technology or infrastructure become available. Any changes to the TDM Program shall be subject to review and approval by the City Traffic Engineer. In reviewing any proposed changes to the TDM Program, the City Traffic Engineer shall ensure that the TDM Program, as revised, is equally or more effective in addressing the issues set forth above.

The revisions to Mitigation Measure 3.14-2(b) are being made to make minor typographical and grammar corrections. The same revisions are being made to parallel language in Mitigation Measure 3.7-1.

Pages 3.14-241 and 3.14-242, Mitigation Measure 3.14-8(b) is revised to read:

Mitigation Measure 3.14-8(b)

The project applicant shall provide a one-time contribution of \$1,500,000 to Caltrans towards implementation of ~~work with Caltrans to implement~~ the following traffic management system improvements along the I-105 corridor:

- a) *Changeable message sign (CMS) on the eastbound I-105 between the I-405 connector ramp and the eastbound South Prairie Avenue off-ramp.*
- b) *CMS on the westbound I-105 between Vermont Avenue and the westbound Crenshaw Boulevard off-ramp.*
- c) *Closed circuit television cameras on the westbound Crenshaw Boulevard off-ramp, the South Prairie Avenue off-ramp, the westbound Hawthorne Boulevard off-ramp, and the eastbound 120th Street off-ramp to I-105.*

The revision to Mitigation Measure 3.14-8(b) is being made to reflect consultations that occurred with Caltrans subsequent to publication of the Draft EIR. The consultations and revision are designed to reflect the fact that, as a result of these consultations, the appropriate amount of the contribution has been determined. This contribution will enable Caltrans to install the identified improvements. Responses to Comments Caltrans-9 and Caltrans-10 provide additional information concerning mitigation for impacts to I-105.

Page 3.14-459, Mitigation Measure 3.14-28(b) is revised to read:

Mitigation Measure 3.14-28(b)

The project applicant shall make a funding contribution to the City of Inglewood Public Works Traffic Division 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. Implement Mitigation Measure 3.14-2(o) (Financial Contribution to City ITS program).

The revision to Mitigation Measure 3.14-28(b) is being made to streamline mitigation language that was repetitive in the Draft EIR. The revision is not substantive.

2.2.19 Section 3.15, Utilities and Service Systems

2.2.19.1 Changes in Response to Comments

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.

This revision is being made based on Response to Comment Sanitation-3.

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 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 332.38332.67 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.)

This revision is being made based on Response to Comment Sanitation-4.

Page 3.15-52, Table 3.15-14 is revised to read:

**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	400 <u>325</u> gallons/1,000 sf	51,808 <u>168,375</u>	0.13 <u>0.42</u>	0.20 <u>0.65</u>
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 <u>1,070,559</u>	2.38 <u>2.67</u>	3.69 <u>4.14</u>

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.

This revision is being made based on Response to Comment Sanitation-4.

Page 3.15-56, Table 3.15-15 is revised to read:

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

Point of Connection	Proposed Land Use	Unit Contribution	Daily Average Wastewater Generation Factor (gpd)	Project Daily Average Flow (gpd)	Project Peak Flow (2.5 x Average) (MGD)	Project Peak Flow (cfs)	Pipeline Segment Diameter	Total Pipe Capacity ^a (cfs)	Cumulative Contributing Flow (cfs) ^b	Cumulative Contributing Flow (MGD) ^b	Capacity? ^b
1 (City's sewer line at South Prairie Avenue and West 102nd Street)	Food and Drink Building	24,000 sf	1,000 gallons/1,000 sf	24,000	0.06	0.09	8	0.34	0.06	0.04	Yes
							8	0.34	0.10	0.07	Yes
	Mixed Use Building	24,000 sf	325100 gallons/1,000 sf	2,400 7,800	0.02	0.01-0.03	8	0.77	0.01	0.01	Yes
	<i>Subtotal</i>	<i>48,000</i>		<i>26,400</i> <i>31,800</i>	<i>0.07</i> <i>0.08</i>	<i>0.10</i> <i>0.12</i>					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>				<i>187,700</i> <i>198,200</i>	<i>0.50</i>	<i>0.77</i>		<i>0.83</i>	<i>0.83</i>	
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.

This revision is being made based on Response to Comment Sanitation-5.

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.)

This revision is being made based on Response to Comment Sanitation-5.

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.

This revision is being made based on Response to Comment Sanitation-6.

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.

This revision is being made based on Response to Comment Sanitation-5.

Page 3.15-75, last paragraph, second to last sentence is revised to read:

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.)

This revision is being made based on Response to Comment LACDPW1-9.

Page 3.15-80, after the fifth full paragraph, add the following text:

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.)

This revision is being made based on Response to Comment LACDPW1-8.

2.2.19.2 Staff-Initiated Changes

There are no staff-initiated text changes in this section.

2.2.20 Chapter 4, Other CEQA-Required Considerations

2.2.20.1 Changes in Response to Comments

There are no text changes in response to comments in this chapter.

2.2.20.2 Staff-Initiated Changes

There are no staff-initiated text changes in this section.

2.2.21 Chapter 5, Project Variants

2.2.21.1 Changes in Response to Comments

There are no text changes in response to comments in this chapter.

2.2.21.2 Staff-Initiated Changes

There are no staff-initiated text changes in this section.

2.2.22 Chapter 6, Project Alternatives

2.2.22.1 Changes in Response to Comments

Page 6-29, third full 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).

This revision is being made based on Response to Comment Channel-41.

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).

This revision is being made based on Response to Comment Channel-40.

Page 6-30, the second full paragraph 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.

This revision is being made based on Response to Comment Channel-45.

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

lessmore 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.

This revision is being made based on Response to Comment Channel-47.

2.2.22.2 Staff-Initiated Changes

Page 6-15, last partial paragraph, the first sentence is revised to read:

Further, development of a housing employment center/business park alternative would not meet the Applicant's project applicant's objectives to build the long-term home of the LA Clippers NBA basketball team (project applicant Objectives 1a-1e)...

The revision to this text in Chapter 6, Alternatives, is being made to correct the incorrect reference to the alternative considered but dismissed form further evaluation.

2.2.23 Changes to Figures

There are no revised figures in the Draft EIR.

2.2.24 Changes to Appendices

Draft EIR, Appendix F, the Bean and Smith 1978 Map is added. This revision is being made based on Response to Comment Gabrieleno1-3.

Draft EIR, Appendices K.3 (corrected LOS worksheets for Intersection #50) and K.4 (Draft Event TMP) were revised.

Draft EIR, Appendix K.4, Page 2, 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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This revision is being made based on Response to Comment LACDPW1-7.

Draft EIR, Appendix K.4, Page 2, 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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This revision is being made based on Response to Comment LADOT-5.

Draft EIR, Appendix K.4, page 17, the following is added as the second paragraph in the LRT Station Access section:

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.

This revision is being made based on Response to Comment Metro-17.

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.

This revision is being made based on Response to Comment Culver CityBus-1.

Draft EIR, Appendix R is revised to add Mr. Stone’s May 14, 2020 memorandum to Mindy Wilcox to the end of the appendix. This memorandum is referenced in Response to Comment Channel-26.